

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

MEGHAN KELLY, PETITIONER

V.

THE UNITED STATES OF AMERICA, THE PRESIDENT OF THE UNITED

STATES, PRESIDENT DONALD TRUMP, RESPONDENT

ON PETITION FOR A WRIT OF CERTIORARI TO

THE DELAWARE SUPREME COURT

PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED

I. Whether failure to serve anyone my Delaware Supreme Court Brief, after the Defendant, President Trump, was removed from office was fatal error, given no relief could be made by Defendant, Former President Trump, since only a sitting President can afford relief, and it was not ripe to move to substitute or serve President Biden without a favorable determination on standing.

II. Whether the Delaware Supreme Court erred in concluding Executive Order 13798 is Constitutional by misapplying arguments related to different executive orders Executive Orders 14015, 13831, 13559, 13198, 13199, 13279, 13342 and 13397, and by overlooking my argument that Executive Order No. 13798, is unconstitutional in violation of the Establishment clause by allowing religions, through churches, temples, mosques or other religious organizations to back government parties or government agents or potential government agents with money, donations, support or otherwise, giving the blasphemous backing of God and religions for the vanity of mere men in place of God, upsetting me with foreseeing physical manifestation of emotional distress including grinding of teeth, tears and at times increased heart pressure, in addition to establishing government religion which substantially burdens my free exercise of religion by those who adopt Trump-religious beliefs.

III. Whether the Delaware Supreme Court erred in concluding the exception, capable of repetition yet evading review did not apply to prevent this

matter to prevent it from being moot since former President Trump may become President, and since President Biden may be substituted for Former President Trump to dissolve government religion to reduce the substantial burden upon my free exercise of religion pursuant to *Religious Freedom Restoration Act*, 42 USCS § 2000bb (1-4), should standing be found.

IV. Pending a favorable determination on standing, whether I should be permitted to continue this suit, by seeking to substitute President Biden for former President Trump in this action to prevent the continued establishment of government-religion by President Biden's continued enforcement of Executive Order 13798 and passage of Executive Orders 14015, and enforcement of related Executive Orders 13831, 13559, 13198, 13199, 13279, 13342 and 13397.

V. Whether the Delaware Supreme Court erred in concluding I did not have standing to seek to enjoin former President Trump from establishing government-religion by overlooking the misconduct establishing government religion, and the causal link, the direct harm to me substantially burdening my free exercise of religion, speech and association, causing emotional distress resulting in physical symptoms by his conduct blaspheming my God, tears and, increased heart pressure, and attacks by strangers adopting government-religious beliefs and even by court agents and arms in this case, based on my perceived religious affiliation as anti-Trump religion, but for the Presidents' misconduct, and the relief that would

afford me a remedy, personally, as a party of one, the enjoining of the President and future Presidents from continued establishment of government religion by inter alias enforcing certain Executive orders.

LIST OF PARTIES

All parties appear in the caption of the case on the cover page. I sued President Trump in his official capacity, as the President of the United States, not in his individual capacity, per my Second Amended Complaint which was not accepted by the Chancery Court. He is no longer President. I do not seek to sue him as a private person, no longer President. Only a sitting President can grant the relief I seek. Should, a favorable determination on standing be given, I seek permission, not a guarantee to continue to seek to substitute President Biden for President Trump, in the Chancery Court below. It is not ripe to sue President Biden without the Chancery Court's authority.

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Appendix E Petitioner's Supreme Court Brief

Exhibit A-4 to Appendix E *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*, and exhibits thereto, Exhibit 55 of the brief below, the December 1, 2020 letter regarding due process concerns to the Master, and the October 19, 2020 letter to the Master regarding the fact I am pro se, not represented by counsel, (Docket 89-90 also separately, Docket 54 and Docket 36)

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Exhibit 10 to Appendix F Article, The Hill, *Trump: Jews who vote Democrat show 'lack of knowledge or great disloyalty'*, by Brett Samuels, 08/20/19, 03:38 PM. (Docket 63)

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Exhibit 20 to Appendix F Article, ABC News, Donald Trump Sells Chinese Goods Despite Accusing China of Stealing US Jobs, Trump says he's "obligated" to buy Chinese goods while China has U.S. jobs., By Susanna Kim, June 17, 2015 (Docket 61)

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Exhibit 22 to Appendix F Article, USA TODAY, Fact check: President Donald Trump donates his salary, but he still makes money, by Molly Stellino, published July 11, 2020 (Docket 63)

Exhibit 23 to Appendix F Article, 'No Blame?' ABC News finds 54 cases invoking 'Trump' in connection with violence, threats, alleged assaults. President Donald Trump insists he deserves no blame for divisions in America, By, Mike Levine (Docket 64)

Exhibit 24 to Appendix F Article, Washington Post, The Trump administration said that militarizing the police reduces crime. Is that true, by Ayse Eldes and Kenneth Lowande, June 1, 2020 (Docket 71)

Exhibit 25 to Appendix F CBS News, "When the looting starts, the shooting starts": Trump tweet flagged by Twitter for "glorifying violence", May 29, 2020 (Docket 71)

Exhibit 26 to Appendix F copy of the web site worldometer, to show healthcare is the biggest global money maker and expense. (Docket 71)

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Exhibit 28 to Appendix F Washington Post, *Paula White, Trump's key spiritual adviser, will join the White House*, By Sarah Pulliam Bailey November 1, 2019 (Docket 71)

Exhibit 29 to Appendix F National Catholic Reporter, The key evangelical players on Trump's advisory board, Sep 5, 2017, by Adelle M. Banks, Religion News Service (Docket 71)

Exhibit 30 to Appendix F Fox News, Trump responds to Milley apology for Lafayette Square photo op, By Brooke Singman, published June 12, 2020 (Docket 71)

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Exhibit 32 to Appendix F Article, HuffPost, Trump Claims COVID-19 Is God Testing Him After He Built 'Greatest Economy In History' The president described boasting to God about his economic successes before the coronavirus pandemic., By Carol Kuruvilla, 08/17/2020 (Docket 66)

Exhibit 33 to Appendix F Article, The Rolling Stone, Trump: People Are Saying 'Merry Christmas Again' Thanks to Him, By Peter Wade, Dec. 23, 2019 4:42 (Docket 67)

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Exhibit 35 to Appendix F Article, Fox News, University professors say more churchgoers believe Trump is 'anointed by God', By Caleb Parke, May 13, 2020 (Docket 69)

Exhibit 36 to Appendix F Article, CBS NEWS, Trump tweets quote calling him the "second coming of God" to Jews in Israel, By Sophie Lewis, Aug. 21, 2019 (Docket 70)

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Exhibit 40 to Appendix F BBC, What are the sexual allegations against Donald Trump?, dated June 25, 2019 (Docket 74)

Exhibit 41 to Appendix F Religious News Service, Paula White to head Trump's faith office, by Jack Jenkins and Adelle M. Banks, November 1, 2019 (Docket 75)

Exhibit 42 to Appendix F The Hill, Trump claims Biden is 'against God' and will 'hurt the Bible' By Brett Samuels, 08/06/20 (Docket 76)

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Exhibit 44 to Appendix F Tweet by President Trump, "DEMS WANT TO SHUT DOWN CHURCHES PERMENANTLY. HOPE YOU SEE WHAT IS HAPPENING. VOTE NOW!" (Docket 78)

Exhibit 45 to Appendix F The New York Times, A Regulatory Rush by federal agencies to secure Trump's legacy, initially posted 10/16/2020, my copy is dated 10/17/2020. (Docket 79)

Exhibit 46 to Appendix F Article appellant drafted concerning 100s and thousands of dollars not getting into the Delaware coffers which could be easily corrected with the legislative pen, My comments to my corporate bar section, ignored, related to my concerns the baby boomers may be screwed out of their retirement and insurance if we do not make changes to care for them instead of what is easier and more profitable for us, the lawyers, and our potential clients, (Docket 80)

Exhibit 47 to Appendix F MSN, Daily News, Trump and aides attend indoor church rally in Vegas without masks, By Theresa Baine, 10/18/2020.

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Exhibit 48 to Appendix F Withdrawn unsubmitted article concerning a recent US Supreme Court case. Freedoms are not for sale, business is not religion, business greed is not God (Docket 82)

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Exhibit 51 to Appendix F Pamphlets sent out when I ran for local office referred in the brief, where I did not violate Jesus's teachings in Matthew 6:1-5 by organized fundraising or false charity (Docket 85)

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Exhibit 53 to Appendix F BBC, *Trump inciting violence, warns election official*, 12/2/20 (Docket 87)

Exhibit 54 to Appendix F The Washington Post, Trump wants to change the libel laws. Here's how they came to be, By Patricia U. Bonomi, June 6, 2019 (Docket 88)

Appendix G Letter to the Supreme Court. Dated July 12, 2021, regarding a Chancery Court staff member directing me to cross out the address to the DE lawyer in order to prevent service, and the attached subpoenas, dated October 12, 2020

Appendix H Excerpts from *Creature of Jeckyll Island*, a Second look at the Federal Reserve, by Edward Griffin, 7th printing 1998, 3rd Ed., by American Media

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IN THE SUPREME COURT OF THE UNITED STATES
PETITION FOR WRIT OF CERTIORARI
OPINIONS BELOW

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

The opinion of the highest state court, the Delaware Supreme Court, to review the merits appears at Appendix (“App.”) A to the petition and is unpublished. The Order of the Delaware Supreme Court denying a Rehearing of their opinion, appears at App. B. The unpublished opinion by the Delaware Chancery Court appears at App. C. The unpublished Master’s final report appears at App. D.

JURISDICTION

The date on which the highest state court decided my case was July 7, 2021. A copy of that decision appears at App. A. A timely petition for rehearing, (App. B-1), was thereafter denied on the following date, July 19, 2021, and a copy of the order denying rehearing appears at App. B. The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

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

STATEMENT OF THE CASE
GOVERNMENT VIOLATIONS OF RFRA, IN RESPONSE TO FILING A CLAIM
FOR RELIEF

Members of the government, including court staff members, purposely interfered to pressure me to forgo or impede this case to protect my free exercise of religion, which I specifically objected to, reserving the issues for appeal, based on Due Process, the First Amendment and the *Religious Freedom Restoration Act*, 42 USCS § 2000bb (1-4) (“RFRA”) in an unaddressed, motion, *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* (Motion 1), reserving the issues for appeal. *Also See*, my *Motion for Reargument*.¹

The Court made no ruling on Motion 1 or on my arguments relating to a fair trial, without Due Process violations in response to my arguments in either the Chancery Court or the Delaware Supreme Court briefs.²

The Delaware Supreme Court also did not address my *Motion for the Delaware Supreme to require the recusal of the Honorable Chief Justice Collins J. Seitz, on May 28, 2021* (“Motion 2”), which provides additional evidence of government suppression of my free exercise of religion, by impeding, seeking to obstruct my right to seek a judicial remedy to freely exercise my religion, based on the established government-religion, association or poverty, reserving objections against the Court in Motion 1, related to Motion 2, in violation of RFRA.³

¹ App. B-1, Ex. A-4 to App. E.

² App. B

³ App. B, B-1, and Exhibits A-4 and A-5 to App. E

A Chancery Court staff member intentionally instructed me to cross off the Civil Process Clerk's address to prevent service on a subpoena to prevent the case from going forward based on her support for President Trump-("Trump") religious views.⁴ This same Chancery Court staff member intentionally sought to sabotage my case by causing me to almost miss my deadline to appeal the *Master's Final Report* based on my religious-political views. She indicated her support for Trump and supports freedom of government servants, like President Trump, to share religion unabridged by the Constitutional limits on government agents, thereby opposing my view to dissolve government-religion. Her intent was based on seeking to suppress my religious beliefs in favor of Trump-religious beliefs, in violation of the RFRA. When I confronted her as to why she misled me not to come in to pick up the ruling, she snidely retorted it was available online.

Judge Clark, a Delaware Court of Common Pleas Judge and DE-Lapp, an arm of the Delaware Supreme Court also sought to obstruct, impede, interfere and prevent me from going forward in my case, which I specifically objected to in Motion 1. I have religious objections to healthcare and mental healthcare that De-Lapp provides.⁵ Per my Motion 1, I informed the DE Supreme Court of some of my religious objections to alleged healthcare by stating:

⁴ App. G, and exhibits to App. G

⁵ Ex. A-4 to App. E. I have religious objections against even physical examinations for trial or for routine check-ups by doctors who provide data, conclusions, as if they are God, or statistics for research money or for pay, which violate my beliefs concerning being numbered as data. See, 1 *Chronicles* 21:1, 1 *Chronicles* 27:24, *Samuel* 24:1, King David sinned against God for using his men as commodities, as mere numbers, not capable of reflecting the divine image of God, but to be used for war or wealth. Distinguish this from our use of the census, which must be used to care for, not exploit humanity. I am a child of God, priceless, not a price tag, to be sold for money. I am not a

“...I certainly hope this Honorable (Delaware Supreme) 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.”

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.⁶ 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

human commodity to examine, to exploit for business greed by being a statistic or number. I believe our current healthcare destroys lives and eternal lives to serve wealth, not good. Please see my proposals to change our healthcare laws to care for people, not exploit them for profit. Ex. 43 to App F. Drugging up the sick and elderly in hospitals is their damnation in hell guaranteed should they die. *Ecclesiastes* 7:1, *Matthew* 24:13, *Ezekiel* 3:17-21. I believe you must use your mind, to think, to care to know, to love to be saved from certain doom. *Deuteronomy* 30:19, *Sirach* 15:11-20.

⁶ *Cantwell v. State of Connecticut*, 310 U.S. 296, 60 S. Ct. 900, 84 L. Ed. 1213 (1940).

hell by teaching business, giving out of one hand to get out of another, is love. Love is unconditional. Business is not the sin. Teaching business is charity is the sin by driving love, God, out of the hearts of men replacing it with the love of money.

Citing, *Matthew 6:1-5*; *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 682, 134 S. Ct. 2751, 2759. (“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 (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.”).

I also confronted government agents with policies that violate my belief in Jesus’s teachings, which may be a source of religious persecution by government agents to hide critiques on religious grounds.⁷ For instance, I filed a law suit against the democrats in Delaware, seeking to run for office without buying a position in office by money, support or compromising signatures with inherent strings attached, but earning it by the freedom of the people to choose, by the vote. The vote should be the only manner to elect officials as the only equal, free and fair form of electing officials by free choice, not forced for sale bought choice. Money is not free speech, but bought speech, rendering unequal weight be given to those with more to barter or exchange, potentially violating the Equal Protections Clause by

⁷ Exhibits 1-8, 15, 46, 52.

disparate treatment based on wealth, making the poor less free.⁸ Officials should not be permitted to be bought in violation of the U.S. Const. Amend. XIII (“13th Amendment”), by essentially compromising the elected officials’ ability to care for the people with all resources, not exploit the people by paying back individuals, and artificial entities without hearts, entities, organizations, businesses, religious organizations, charities and not for profits (“beasts”), for their support, who take more than government resources, through incentives, grants, tax breaks or favors to exploit need to serve greed for money, not love for humanity, they also take people’s freedom through artificial debt creating forced servitude to pay back debt to feed the beasts who exist based on the love of money, not love of humanity. Only humans can love. Entities cannot. That makes each of you justices, individually more powerful than the court, by your free choice to choose to love humanity over money, by seeking justice over concern with business costs, convenience, and comfort.

Creation of manufactured forced jobs by use of tax breaks or tax dollars to feed beasts, and forced, not free labor in a take it or go without alternative, in violation of the 13th Amendment, stifles innovation that improves humanity’s lives, through free thought and debate, even finding flaws to correct imperfect business proposals, in a forced, not free market where people across the board and

⁸ Disparate treatment by the government’s application of election laws based on economic class or affiliation with groups that give some classes of people greater position to buy and sell or market leaders, making others less free to freely chose leaders who are otherwise for sale puppets should violate the Equal Protections clauses through the Fourteenth Amendment applied to the state and the Fifth amendment component applied to the federal government. The vote, not money should determine who Americans freely choose as elected officials.

professions are forced to adhere to the narrow view across the profession, by conformed standards taught by continuing education classes and schools, not by the use of workers' free will, their brain, to freely care for the people, but only for the trained for profit narrow standards of those who create the jobs to exploit labor and consumers for profit.

Forced volunteer positions, required by mandate for food stamps, or forced pro bono by professions to feed beasts also violates the 13th Amendment.

I do not force my will or God's will upon others as that is sin. Not even God forces his will upon us, but we have free choice. So, I seek to protect the free choice of humanity from the forced choice of the few who diminish the freedom of conscience of the many by economic, physical or social persecution and force. Without the Court's protection of free choice, the freedom of conscience, none are free by the oppression of the forced choice of those with money, power and connections that force their will upon humanity, without constraint in the form of the rule of law or love written on hearts, namely the Constitutional limits on governments that grants us freedom from forced control, tyranny.⁹ See *Jeremiah*

⁹ Speaking of forced will, rendering us no longer free, this summer I discovered two books written by the World Economic Forum founder, *The Fourth Industrial Revolution*, by Klaus Schwab, 2016 version, excluding additional pages of the 2017 updated version, which may be found at https://www.academia.edu/38203483/The_Fourth_Industrial_Revolution_pdf?fbclid=IwAR1koMak7N-40mbSf9wSGt8XzdhAJgafnbmobfn70FB4nbqcafl_hsN-RnQ and *Covid-19: The Great Reset*, by Claus Schwab and Thierry Malleret, published 2020, <https://carterheavyindustries.files.wordpress.com/2020/12/covid-19-the-great-reset-klaus-schwab.pdf>, alluding to the elimination of the dollar, and an economic crash with about 47 percent of Americans expected to be unemployed by 2026-2027. The Fourth Industrial revolution's plans to make profit a different conniving way, not improving the lives of humanity, exploiting humanity for the love of money differently. One of the jobs to be eliminated is lawyers, meaning the courts may be in jeopardy too. The books allude to, the dismantling of government by a takeover through the back doors to our electronic devices, and by government-private partnerships. Such partnerships allow

the government to become powerless to enforce the rule of law against its own partners, private entities. Since governments collude with them. My goal to dissolve the bought, not free, or based on freedom. union of government-religion. This merely coincidentally is the first step to prevent the schemes to harm humanity for the profit of a few. The US Attorney Generals may seek to prevent the planned global economic crash by dissolving government-private partnerships, dissolving corruption within the government by the spend it or lose it provisions rewarding waste, prevent bail outs, incentives and tax breaks to entities as opposed to people, and by prohibiting the requirement of paying, fundraising, or gathering signatures or support in order to participate as candidates, possibly in violation of bribery or fiduciary laws. Allow the vote to be the only form to elect leaders. In addition, the Attorney General must also close the back door President Bush, Jr. opened up after 9-11 to our electronic devices to prevent the planned crash of the economy. Plan B, which should be done anyways, is for the government to take back the government coining power from the private sector, the Federal Reserve, and coin money without interest, and without debt to care for the people as both Presidents Lincoln and Kennedy chose to do. President Lincoln created debt free, interest free money by signing the Act of Feb. 25, 1862, ch. 33 § 1, 12 stat. 345.28. President Kennedy signed FR 5605, Exec. Order No. 11110, which also created money, without exploiting the masses to pay it back to those who do not earn it, but take it, essentially giving free lunches to those already fat, serving greed, not need, in violation of the 13th Amendment. See the *Creature of Jeekyll Island*, a Second look at the Federal Reserve, by Edward Griffin, 7th printing 1998, which may be found at https://ia802609.us.archive.org/14/items/pdfy--Pori1NL6fKm2SnY/The_Creature_From_Jekyll_Island.pdf. Also see Exhibit H. (See, how banks create money out of nothingness to profit off of indebting the people to interest and the federal government to pay interest on bonds. The government can coin money without creating debt and interest no matter what these conniving economists who seek self-gain sell you, at the cost of hurting others). Please note, I disagree with his theories premised on violating God's laws, there is a way to care for the sheep in a shepherd's pasture, not fatten them up and eat them with the wolves.

The Stock market is nothing but resold debt, which can be artificially increased the appearance of value, through stock buy backs, decreasing supply to increase demand, which artificially creates the appearance of prosperity. There is nothing there but I owe you's, same as the banks. Our economic model is built on a Ponzi scheme, selling what entities don't have at a profit, and reselling debt into infinity, until crashes occur by design, federally backing the banks, not the people. When all the entities finish manipulating truth to artificially inflate their own salaries, profits and bonuses transferred to people, within entities, who seek to be shielded from liability in entities by hiding money in offshore accounts, and the entities go into bankruptcy, the baby boomers will lose their retirements, pensions, and life savings, if no one asks the courts to save the day. We must not be blinded by money, but see the present harm ahead. I beg this Court to be our hero of not only the US, the world, but all of humanity, by preserving the rule of law, from the lawless mark of the beast, business greed, anything goes for the bottom line. "Justice in the courts is a command by God." *Amos* 5:15, a "greater command, along with mercy and faithfulness" per Jesus. Citing *Matthew* 23:23. You have the power to save life and eternal life by justice, or to destroy life and mislead people to harm and hell by choosing money and material gain as worth human sacrifice, injustice guaranteed. Please note, Presidents Bush Junior, Clinton, Trump, Obama, Vice President Biden and Trump's daughter all know or should know of the intended elimination of the dollar, economic crash, and dismantling of the rule of law, replaced with the reign of lawless, unrestrained business greed, the mark of the beast, the whore, the twice dead. They attended the World Economic Forum meetings. Please help us your honors. Our Presidents and Congress people misbehave and need your loving governing correction with mercy to tame them from behaving like beasts instead of men with hearts to sacrificially serve and care for the people. Please help us. Preserve the rule of law. You are our hope of a hero. Please restrain the unbalanced two limbs within the Constitutional rule of law, from selling our freedoms away to enslave us as serfs, should the World Economic Forum's plan remain unstopped. Our leaders are dumb and blind, blinded by money. *Sirach* 27:1 ("For the

31, The law of love is written on the hearts of all humanity with the death or resurrection of Jesus per *Jeremiah* 31, accessible to all humanity, gentile or Jew, should they not choose to harden their hearts by giving into temptations, distractions, not to use our free will, brain, to think, to care, to know, to love in truth. See, Galatians 3:28.

The government agents acted based on retaliation of my exercise of religious objections to government conduct in violation of RFRA.

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. “Retaliation by public officials against exercise of First Amendment rights is itself violation of the First Amendment.”¹⁰

The retaliation by the court against me, for exercising the right to seek access to the courts to remedy grievances, evidences the established government-religion directly caused harm, suppressing and impeding my freedom to worship and stand up for my faith to worship Jesus the Christ in court, and causing foreseeable reasonable infliction of mental distress, in violation of the RFRA.

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.

I have the freedom to pursue justice in the courts, to protect my freedom to

sake of profit, many sin, and the struggle for wealth blinds the eyes”), *Matthew* 13:13, *Deuteronomy* 29:4.

¹⁰ *Zilich v. Longo*, 34 F.3d 359 (6th Cir. 1994), U.S.C.A. Const. Amend. 1.

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 under the established government-religion. 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.

I. FAILURE TO SERVE THE BRIEF TO EJECTED DEFENDANT

My failure to serve anyone my Delaware Supreme Court Brief, after the Defendant, President Trump, was removed from office was not a fatal error, given no relief could be made by Defendant, Former President Trump, since only a sitting President can afford relief, and it was not ripe to move to substitute or serve President Biden without a favorable determination on standing for the continued.

I only served President Donald J. Trump, and the US Attorney General William Barr the Complaint together with the Amended Complaint. The Court did not grant me permission to serve the US Attorney General's Office for the District of Delaware yet. All process was halted pending an outcome on this issue, including all subpoenas for the Second Amended Complaint I filed on October 12, 2020, with a corrective complaint October 13, 2020.

On January 20, 2021, President Biden ("Biden") replaced President Trump. Trump is no longer President of the United States. I am seeking relief against the President in his official capacity, not in the president's personal capacity. Trump, in his personal capacity, is no longer a defendant in this action, as he cannot afford the relief only a sitting President, Biden, may afford.

William Barr, Esquire is no longer US Attorney General. William Barr, Esquire was replaced with U.S. Attorney General Merrick Garland. I have not amended my complaint to include the current President, President Biden yet. US Attorney General Merrick Garland is unable to represent former President Donald J. Trump or President Biden at this time. The Chancery Court did not send its March 26, 2021 Order Overruling my exceptions to the Master's Final report.¹¹ There was no defense counsel or Defendant to serve for the Delaware Supreme Court appeal. Pending a favorable review, I would be permitted to make a motion to amend my complaint, to substitute Trump with Biden to serve President Biden the amended complaint.

President Biden is not prejudiced, since I have not amended the complaint to make him a party, and his counsel, has every Document in this case and notice that I may file a claim against President Biden, should the courts grant me permission.

In the alternative, I pray your honors find service is excused for good cause in light of the unique facts in this case.

Should the Court affirm on the issue of serving the Delaware Supreme Court brief, I respectfully request your honors grant me dismissal with prejudice, to prevent res judicata from barring future claims on the same or similar alleged conduct.

¹¹ App. C-1.

Defendant former President Biden is not prejudiced, as I do not have a favorable ruling granting me permission to seek to continue this suit to potentially substitute him as a party. Substitution of parties is not automatic in the Delaware Chancery Court, unlike the US Supreme Court Rule 35.¹² I personally delivered a copy of every document I filed in this case to US Attorney General David Weiss in the District of Delaware, and mailed US Attorney General David Garland every document filed with the Delaware Supreme Court. They have every document in this case, albeit a new amended Complaint must be filed against President Biden before this case may continue, as not yet ripe, or in the alternative, I respectfully request your honors, dismiss this case with prejudice, preventing res judicata and collateral estoppel relating to these uniquely important claims.

II. EXECUTIVE ORDERS ESTABLISHING GOVERNMENT-RELIGION, BUT FOR CAUSING ME HARM, SOCIAL SUPPRESSION, ECONOMIC, FORGOING GOVERNMENT BENEFITS, HARM PHYSICAL BY EMOTIONAL DISTRESS CAUSED BY BOUGHT OR GOVERNMENT BACKED ESTABLISHED RELIGION, MONEY AS GOD, BLASPHEMING GOD'S NAME FOR THE VANITY OF SOULLESS ORGANIZATIONS INCAPABLE OF FREE WILL TO CHOOSE TO LOVE

The Delaware Supreme Court erred in concluding Executive Order 13798 ("E.O. 13798") is Constitutional by misapplying arguments related to different executive orders, and by overlooking my argument that Executive Order No. 13798,

¹² See, Chancery Court Rule 25

is unconstitutional in violation of the Establishment clause by allowing religions, through churches, temples, mosques or other religious organizations to back government parties or government agents or potential government agents with money, donations, support or otherwise, giving the blasphemous backing of God and religions for the vanity of mere men in place of God, without losing their tax exempt status, upsetting me with foreseeing physical manifestation of emotional distress including grinding of teeth, tears and at times increased heart pressure, in addition to establishing government-religion which substantially burdens my free exercise of religion by those who adopt Trump-religious beliefs.

Government servants are mere men, not God's anointed I believe Jesus is the savior, not mere men, not President Trump or President Biden. It is blasphemous to allow religion to back government with funding or otherwise, as opposed to individual religious people. Allowing religious entities to buy or barter for government power, influence with money, support, favors or otherwise, through donations to government candidates or government parties, as this executive order permits violates the Establishment Clause and RFRA by making me, and other Americans less free to worship by the dictates of our conscience, not the dictates of the dollars that force government-backed or bought religion.

The United States is a democracy, not a theocracy, with freedom of religion, not forced religion under the threat of government sponsored private and public economic, physical or social persecution, such government-religious-beliefs and

government-religious-parties inherently create. My God is not for sale for government gain.

Churches are now demonizing liberals and democrats, including me as anti-Christ with immunity E.O. 13798 gives them, inciting parishioners and others to do the same against me, causing emotional distress and the chilling of my free exercise of religion, speech and association.

Since I do not support Trump, and claim to be a democrat, people have accused me of not being a Christian, reasonably causing me to experience emotional distress and substantially burdening my free exercise of religion, speech and association by leaving it restrained and at times unexercised, but for Trump's incitement towards perceived, projected manufactured dissidents, including liberals like me, as antichrist.¹³

“The very adoption or passage of a policy that violates the Establishment Clause represents a constitutional injury.”¹⁴

Presidents Trump, Bush Junior, Obama, and Biden also passed a series of additional executive orders, making us less free to worship freely, by buying the support of churches by paying them to perform government welfare duties, thereby, increasing waste by artificial entities without hearts, churches, organizations, not for profits and businesses (“beasts”), who seek to get as much as they can for as little as they can. Citing, Ex. Or. No. 14015, Feb. 14, 2021; Ex. Or. No. 13198, Jan. 29, 2001, as amended by Ex. Or. 14015, Feb. 14, 2021; Ex. Or. No. 13199, Jan. 29,

¹³ Exhibit A 19, 20 to App. F

¹⁴ Citing, *Kitzmiller v. Dover Area Sch. Dist.*, 400 F. Supp. 2d 707, 708, (2005)

2001, as revoked by Ex. Or No. 13831, May 3, 2018; Ex. Or. No. 13279, December 12, 2002, as amended by Exec. Or. No. 13559, November 17, 2010; Ex. Or. No. 13559, Nov. 17, 2010.; Ex Or. No. 13831, May 3, 2018; Ex. Or. No. 14015, Feb. 14, 2021, (Collectively “Executive Orders”).

Beasts run on cold hard cash, not love, no matter the name of the entity, church or not for profit, when they seek to give to get under the illusion of charity, but in truth are paid money to perform government business by the government. See *Matthew* 6:1-5. The Executive Orders create inefficiencies, while increasing government debt for government gain, at the cost of making us all less free. Far worse, the Executive Orders encourage churches to supplement with alleged charity, by fundraising or otherwise, to serve business greed. I believe teaching business is charity damns the perpetrators and those they mislead to hell, causing economic harm here, and damnation in hell forever, by the bought or bartered for loyalty of churches to political parties, candidates to offices and government agents in an unholy bought or bartered for union of church and state, not free, but for sale. I believe the government should perform its own work instead of paying churches, or other organizations, government work for pay under the deception of charity.¹⁵

I believe people go to hell for volunteering, pro bono, organized charity and fundraising by ignorantly teaching giving to get, even recognition, or tax breaks, is charity, should they not repent. Jesus teaches to give unrecognized without giving

¹⁵ Organizations and associations are dangerous, teaching people to reflect the image of Satan, the image of the beast, without hearts who run on cold hard cash as organizations do. The right of the individual to associate must be preserved, not the right of associations, and entities such as churches to consume, and eliminate, the rights of the individual, making them no longer free.

out of one hand to get out of the other when giving alms.¹⁶ So, it is far worse when churches perform business under the deception of charity.

Since, I filed in forma pauperis, I am likely eligible or possibly was eligible in the past to receive government aid by churches who perform government welfare in exchange for government funding in part or in toto, including but not limited to my own Catholic Diocese. Yet, I refuse to ask for aid as it violates my belief in Jesus, since I believe such aid damns people to hell by teaching business is charity, driving out love from the hearts of man replaced with the love of money and material gain, the mark of the beast, business greed. *Matthew* 6:1-5. Jesus teaches they will not go to heaven or have eternal life. “(T)hey have their reward.” *Matthew* 6:1.

My Diocese of Wilmington, accepts government funding in part, and in toto for alleged charity but in truth the business of government, thereby I believe violating Jesus’s teachings in *Mathew* 6:1-5.

In *Trinity Lutheran Church of Columbia, Inc. v. Comer*, “Chief Justice Roberts, held that Missouri's anti-establishment provision “punished the free exercise of religion” by putting would-be aid recipients to the choice whether to give up the aid or give up their religious natures.’¹⁷

I too am similarly punished for free exercise of religion as a result of the Executive Orders’ impact, as applied to me, by making me choose between serving Jesus, or compromising my belief in Jesus to receive government aid by churches.

¹⁶ Ex. A To App F, App F, App E.

¹⁷ *Trinity Lutheran Church of Columbia, Inc. v. Comer*, 137 S. Ct. 2012, 198 L. Ed. 2d 551 (2017); Brendan T. Beery, *Free Exercise Standing: Extra-Centrality As Injury in Fact*, 93 St. John's L. Rev. 579, 598 (2019).

I chose not to ask for aid. I do not choose to disobey Jesus and mislead other people God loves to the thinking, the belief in a lie that will damn them to hell.

My religious beliefs prevent me from applying with my church for governmental funded services. “A community member should not be forced to forgo a government service to preserve his or her ability to challenge an allegedly unconstitutional religious display or activity.”¹⁸

In order to receive government aid, I am forced to violate my religious beliefs, by applying for or accepting benefits from a religious organization. Thus, I go without potential aid, but for the establishment of government-religion, a union, a partnership based on pay, not freedom, which is not freely established but is established in a bought or bartered for union, making us all less free.¹⁹

“The Establishment Clause prohibits government from establishing a religion in the sense of sponsorship, financial support, or active involvement of the sovereign in religious activity.”²⁰

¹⁸ Citing, *Freedom from Religion Found. Inc v. New Kensington Arnold Sch. Dist.*, 832 F.3d 469, 479 (3d Cir. 2016).

¹⁹ See, *Sherbert v. Verner*, 374 U.S. 398, 399, 83 S. Ct. 1790, 1791, also see, *Thomas v. Rev. Bd. of Indiana Emp. Sec. Div.*, 450 U.S. 707, 716, 101 S. Ct. 1425, 1431, 67 L. Ed. 2d 624 (1981), (“ More than 30 years ago, the Court held that a person may not be compelled to choose between the exercise of a First Amendment right and participation in an otherwise available public program. A state may not ‘exclude individual Catholics, Lutherans, Mohammedans, Baptists, Jews, Methodists, Non-believers, Presbyterians, or the members of any other faith, because of their faith, or lack of it, from receiving the benefits of public welfare legislation.’” Citing, *Everson v. Board of Education*, 330 U.S. 1, 16, 67 S.Ct. 504, 511, 91 L.Ed. 711 (1947).

²⁰ *Kalman v. Cortes*, 723 F. Supp. 2d 766, 769, (2010).

The Government paid thousands of PPP loans to Catholic churches, making my God look like a God of greed not love, thereby misleading people to hell, but for the Executive Orders, and reasonably foreseeably causing me emotional distress.²¹

The Third Circuit held, “Neither a state nor the federal government can, openly or secretly, participate in the affairs of any religious organizations or groups and vice versa.”²² Here the executive orders allow both the state and the federal government to openly and in secret participate in the affairs of religious organizations, and vice versa, violating the Establishment Clause, through “partnerships” by pay.

The conduct I refer to herein, and the continued enforcement of E.O 13798 and the other Executive Orders by Biden, constitute excessive entanglement by establishing government-religious associations and beliefs, by the partnered paid, not for freedom, but for sale, union of church and state.

“The Establishment Clause prohibits government from establishing a religion in the sense of sponsorship, financial support, or active involvement of the sovereign in religious activity.”²³

The Executive Orders must be ruled unconstitutional, on their face. Religion is not a business by religious entities. If religion is a business, the entity sells goods and services based on a license, permission to provide goods or services,

²¹ Exhibits 38-39 of App. F. See, *Doe v. Indian River Sch. Dist.*, 653 F.3d 256, 259, 2011

²² *Doe v. Indian River Sch. Dist.*, 653 F.3d 256, 259.

²³ *Kalman v. Cortes*, 723 F. Supp. 2d 766, 769, (2010).

not based on freedom, with the ability to force religious views upon customers who may not be able to buy if they do not adopt the business religion with regards to this Court's decision in *Masterpiece Cakeshop, Ltd. v. Colorado C.R. Comm'n*, 138 S. Ct. 1719, 201 L. Ed. 2d 35 (2018), or sell with this court's decision *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 134 S. Ct. 2751, 189 L. Ed. 2d 675 (2014), abrogating *Autocam Corp. v. Sebelius*, 730 F.3d 618, because it requires employees to adopt their business's religious exercise or go without employment, rendering businesses government reinforced god-heads.

The Courts recent decisions give the illusion of freedom, but it is based on business which is not freedom but offering rights for sale.

In *Revelation 13:17*, scripture indicates "no one can buy and sell unless they have the mark of the beast," which I believe is business greed by barter or exchange.

These two decisions immunize what I believe is the mark of the beast, business greed, by entities and organization that have no power to do good by love, as protected from court interference, making people no longer free, but for sale slaves under entity and organization control who may force their will upon others under the threat of going without, under the lawless reign of their lusts.

Enjoining enforcement of the Executive Orders as unconstitutional, on their face, would prevent the Court from making similar decisions that eliminate free exercise of religion while teaching people the mark of the beast, business greed,

without restraint, in the form of laws or love, as lawful and encouraged, leading to harm and hell, should people not repent.²⁴

III. CAPABLE OF REPETITION, YET EVADING REVIEW, SUBSTITUTION OF PARTY

The Delaware Supreme Court erred in concluding the exception, capable of repetition yet evading review did not apply to prevent this case from being moot since former Trump may be reelected, and since President Biden may be substituted for former President Trump to dissolve government-religion to reduce

²⁴ The Supreme Court is misguided by money saved or gained by entities who under the guise of freedom of religion, control people, forcing their religious views, by business greed again in *Little Sisters of the Poor Saints Peter & Paul Home v. Pennsylvania*, 140 S. Ct. 2367, 207 L. Ed. 2d 819 (2020). Here, “The Supreme Court... held that ACA authorized Health Resources and Services Administration (HRSA) to exempt or accommodate employers’ religious or moral objections to providing no-cost contraceptive coverage.” This arguably saves the employer more money in insurance costs, at the exchange of losing coverage for their employees, bartering away, selling other people’s free choice, their souls, or freedoms, for the bottom line by forced choice, which is based on the mark of the beast, business greed, enslaving others to bend to your religious will, diminishing their free will, by economic force, potentially losing a job. The Supreme Court is bartering away people’s freedoms to artificial entities without hearts without the ability to reflect the image of God, by love. Beasts run on cash. Jesus teaches you cannot serve God and Money. I choose God. Money is not speech either. It is bought not free, not freedom of speech. If buying and bartering for a voice is free speech, only those with money power and connections, have the freedom to purchase a louder voice to be heard, in violation of the Equal protections clause, by disparate treatment based on poverty and wealth. Wealth does not make one more important, more worthy of being heard, creating unequal treatment and mistreatment of the poor.

This Court erred in *Citizens United v. Fed. Election Comm'n*, 558 U.S. 310, 130 S. Ct. 876, 175 L. Ed. 2d 753 (2010). This Court erred in the finding “Use of funds to support a political candidate is speech.” *Austin v. Michigan Chamber of Com.*, 494 U.S. 652, 110 S. Ct. 1391, 108 L. Ed. 2d 652 (1990), overruled by *Citizens United v. Fed. Election Comm'n*, 558 U.S. 310, 130 S. Ct. 876, 175 L. Ed. 2d 753 (2010)

This Supreme Court also erred in *Our Lady of Guadalupe Sch. v. Morrissey-Berru*, 140 S. Ct. 2049, 207 L. Ed. 2d 870 (2020), rendering religious organizations to lawlessly do as they please, fire employees unjustly without remedy. It appears that if a religion allows an entity to discriminate, to do what is most advantageous for the bottom line regardless of the harm, so long as they use the name of God or religion, including non-religion, artificial entities without hearts will chose their own religion, including non-religion forcing people no longer free to bend their will to serve business greed, the mark of the beast, without discipline to sacrifice material gain to love humanity, in the form of the rule of law, or love written on humanity’s hearts per Jeremiah 31.

the substantial burden upon my free exercise of religion pursuant to RFRA, should standing be found.

Trump is no longer President, yet, “(1) the challenged conduct action is in its duration too short to be fully litigated prior to its cessation or expiration, and (2) there is a reasonable expectation that the same complaining party will be subjected to the same action again.”²⁵

Trump, should he be re-elected, will likely persist in the same course of lawless behavior establishing government-religious beliefs to glorify himself and dehumanize his dissidents, demonizing me, by identifying my political position as anti-Christ, misleading people to persecute me by unholy government-backed incitement, causing additional physical harm related to emotional distress and suppression of my free exercise of religion, speech and association.

I reasonably, foreseeably fear greater physical and Constitutional injury to me should Trump be reelected, without the Court’s ability to restrain him. I pray this honorable court prevents res judicata from applying for my potential claims against Trump, since he will likely run in 2024, and become reelected. People have already been killed based on their political-religious beliefs in recent years, directly caused by and but for government incitement through former President Trump’s Government-religion, or espoused or projected religious ordained beliefs.

²⁵ *United States v. Sanchez-Gomez*, 138 S. Ct. 1532, 200 L. Ed. 2d 792 (2018).

IV. LEAVE TO CONTINUE SHOULD BE GRANTED

Pending a favorable determination on standing, I should be permitted to continue this suit, by seeking to substitute President Biden for former President Trump in this action to prevent the continued establishment of government-religion by President Biden's continued enforcement of Executive Order 13798 and passage of Executive Orders 14015, and enforcement of related Executive Orders 13831, 13559, 13198, 13199, 13279, 13342 and 13397.²⁶

V. STANDING

The Delaware Supreme Court erred in concluding I did not have standing to seek to enjoin former Trump from establishing government-religion by overlooking the President's misconduct establishing government-religion, including enforcement of the executive orders, and the causal link, the direct harm to me substantially burdening my free exercise of religion, speech and association, in violation of the First Amendment of the US Constitution, the Due process component of the fifth amendment, and RFRA, causing emotional distress resulting in physical symptoms, attacks by strangers adopting government-religious beliefs, foregoing on government benefits provided through religious organizations, and misconduct by court agents and arms in this case impeding my ability to freely bring this case, based on my perceived religious affiliation as anti-Trump-religion or party-religion and the relief that would afford me a remedy, personally, as a party of one, the

²⁶ See Chancery Court Rule 25 (d) and *ClubCorp, Inc. v. Pinehurst, LLC*, No. CIV.A. 5120-VCP, 2011 WL 5554944, at *5 (Del. Ch. Nov. 15, 2011), with regards to substitution of elected officials.

enjoining of the President and future Presidents from continued establishment of government-religion by inter alias enforcing the Executive orders, including E.O. 13798. *U.S. Cons. Amend. 1, U.S. Const. Amend. V.*²⁷

A. TRUMP CONDUCT EXCESSIVE ENTANGLEMENT ESTABLISHMENT GOVERNMENT-RELIGION BEYOND THE EXECUTIVE ORDERS

Trump further exacerbated the establishment of government-religion by glorifying himself or his party, as Godly, while demonizing dissidents as attacking God and encouraging violent, verbal or economic attacks against dissidents, based on religious-political association in violation of RFRA.²⁸

Trump also excessively entangled his government duties with religion through collective behavior, taken as a whole establish government-religion, beyond the executive orders, including but not limited to:

1. appointing a personal spiritual advisor, and alleged Christian leaders to advise the President, creating the religious backing and the appearance of Godly guidance supporting Defendant's government authority;²⁹
2. holding up a Bible in front of a church for a photo op after people were gassed in response to their Constitutional exercise of affiliation and speech at a protest;³⁰

²⁷ App. F pgs. 13-66, App. E pgs. 4-21, Ex. 1-54 to App. F.

²⁸ App. E and F, and Ex. A to App. F, and Ex 1-44 to App. F.

²⁹ Exhibit A To App F at 293-298, Exhibits 28, 29, 41 to App F.

³⁰ See Exhibit A 299-319 to App. F, Exhibit 30 to App. F, *Matthew* 5:38-39, *Matthew* 26:52, *Genesis* 9:5-6, *Psalms* 11:5.

3. hypocritically claiming “Biden will hurt the Bible;”³¹
4. persecuting people who exercised their freedom to worship or not by the dictates of their own conscience, not government-religious commands, by demeaning those who omitted the word God in the pledge of the allegiance; ³²
5. improperly sharing his alleged prayer to God, while acting under the color of the law;³³
6. creating the illusion there is a war on Christmas, by liberals like me;³⁴
7. repeating the government-religious belief that he may be the chosen one by God, contributing to the government-religious belief Trump is anointed by God;³⁵
8. moving the US embassy in Israel to Jerusalem for a religious group, Evangelicals; ³⁶
9. sponsoring and inciting private persecution towards liberals by churches and its parishioners, by buying loyalty by barter or exchange, even by praise, for a little something down the line, such as bailouts, or power to persuade politicians, at the cost of teaching some preachers and parishioners to persecute non-Trump supporting liberals like me, and including me;³⁷

³¹ Exhibit A 320-321 to App F, Exhibit 42 to App. F.

³² Exhibit A 322-328 of App. F, Exhibit 31 of App F.

³³ See Exhibit A, 329-335 to App. F, Exhibit 32 to App. F.

³⁴ Exhibit A 336-347 of App F, Exhibit 33 of App F.

³⁵ Exhibit A 348-353, Exhibit E, Exhibits 34, 35, 36.

³⁶ Exhibit A 354-355, Exhibit E, Exhibit 37.

³⁷ See Exhibit A 356-371 of App F, Exhibits 9,38-39 of App F.

10. tweeting fabrications making it appear democrats like me are attacking the church including the tweet. “DEMS WANT TO SHUT YOUR CHURCHES DOWN, PERMANTLY. HOPE YOU SEE WHAT IS HAPPENING. VOTE NOW;”³⁸
11. signing another Executive Order, Ex. Or No. 13831, May 3, 2018, which increases the temptation for government employees, including the President, to back religions financially or otherwise, in hopes to receive their government backing and government support in return under E.O. 13798; and
12. using his son to glorify him as the savior of Christianity, when I believe Jesus the Christ is the savior under Christianity. Eric Trump said his “father ‘literally saved Christianity...there is a full war on faith on the other side, (meaning my democrat side). (Eric continued), ‘The Democrat Party, the far left, has become the party of atheists, and they want to attack Christianity’”³⁹

B. SUBSTANTIALLY BURDENING FREE EXERCISE OF RELIGION, SPEECH, AND ASSOCIATION

President Trump established government-religion through his speech and conduct by inter alias, persecuting perceived religious-political affiliations or projected non-religious-political affiliates, while adopting or teaching religious-

³⁸ Exhibit 44 to App. F.

³⁹ Exhibit 49 to App. F.

beliefs or adopting religious partnerships' beliefs, while acting under the color of the law, in his official capacity as President. ⁴⁰

I am a Christian. I believe in God revealed to me through the father, Jesus and the holy spirit, including the holy spirit shown through people in the Bible who freely, willfully chose to do God's will above their own.

Since I do not support Trump, and claim to be a democrat, people have accused me of not being a Christian, reasonably causing me to experience emotional distress and substantially burdening my free exercise of religion, speech and association by leaving it restrained and at times unexercised, but for Trump's incitement towards perceived, projected manufactured dissidents, including liberals like me, as antichrist.⁴¹

**C. EMOTIONAL DISTRESS RELATED TO PEOPLE GOING TO HELL,
BUT FOR GOVERNMENT-RELIGION**

Besides inciting others to substantially burden my free exercise of religion, speech, and association, and forgoing of government benefits distributed through religious private entities, Government-religion caused foreseeable infliction of emotional distress manifesting in tears, anxiety, clenching of teeth, and at times increased blood pressure. ⁴²

⁴⁰ Ex. A of App. F at 34, 293-298, 352-433, Ex. 10, 11, 27-39, 41-42, 44, 47, 49 to App. F, and App. F.

⁴¹ For examples of Trump inciting attacks against democrats like me, including me, and other projected dissidents to Trump based on religion please see, Ex 10, 11, 24, 25,30,31, 33, 53 to App. F

⁴² Ex. 52 to App. F

While repeating claims he is God's chosen one or is saving Christianity and the bible, as if he is a God-head in government or the savior, I believe Trump reflected the image of the devil by serving greed, and his own desires, not good by love and by modeling other antichrist behavior, thereby misleading people I love who adopt his government-religion, to be twice dead, should they not repent, foreseeably causing infliction of emotional distress manifesting in physical symptoms.

I oppose mental healthcare and medical examinations on religious grounds. So, whether you find the physical harm to me concrete, directly established but for government-religion, will be based, on whether you believe me, not on outside expert opinions or treatises which I object to on religious grounds.

I care about others outside of my own. That does not make me crazy. It makes me a Christian. I do not want people to be misled to harm and hell under the Government-Religion's guise of godliness.

Trump exhibited Anti-Christ beliefs, by allowing the gassing of protesters in order to gain a photo shoot with the Bible. Jesus the Christ calls for love of our enemies, and turning the other cheek not use of violence to persuade dissidents to conform to your will by force.⁴³ Similarly, Trump exhibited Anti-Christ beliefs by inciting violence and called for militarization of police and for the use of violence

⁴³ Citing, Exhibits 10, 11, 24, 25, 30, 31, 44, 49, 53 to Appendix F, See, *Luke* 6:26-35, *Matthew* 5:39-48, *Romans* 12:20, *Proverbs* 25:21, *Exodus* 23:4-5, 2 *Kings* 6:22, 2 *Chronicles* 28:15, *Genesis* 9:5-6.

against perceived dissidents to Trump or Government-religion which is Anti-Christ, while claiming support of Christ and support of Christians. ⁴⁴

Trump reflects the image of the devil, the Anti-Christ by lies, by teaching the lie democrats made people less free to say Merry Christmas, accepting the propaganda praise of his son, Eric who indicated Trump saved Christianity, and by indicating Democrats are the enemies of the Church by tweeting Democrats want to eliminate churches.⁴⁵

Trump reflects the image of the devil, not Christ, by teaching the sin of pride and putting himself first, his family first, and the illusion of America First, when Jesus the Christ teaches us the new command to love one another, love others as yourself, not love yourself more at the cost of ignoring the needs of others, even harming others to serve self.⁴⁶ Loving your kids or parents more is damnation guaranteed, per Jesus. *Matthew* 10:34-37.

⁴⁴ Id.

⁴⁵ Exhibit A to Appendix F, Exhibit 49 to Appendix F. See, John 8:44.

⁴⁶ Citing, Exhibits 12-14 of Appendix F, See, *Isaiah* 14, *John* 13:34-35, "A new command I give you: Love one another. As I have loved you, so you must love one another. By this everyone will know that you are my disciples, if you love one another." *Mark* 12:30-31, "Love the LORD your God with all your heart and with all your soul and with all your mind and with all your strength.' The second is this: 'Love your neighbor as yourself.' There is no commandment greater than these." Jesus teaches people go to hell for putting parents or kids or self first, for loving self or your family more than others, and more than God. See, *Matthew* 10:34-37. Jesus teaches those who love mother and father more than Jesus, or son or daughter more than Jesus are not worthy of eternal life. In *Matthew* 25:1-13, the parable of the 10 virgins, all 10 had lamp oil. Five ran out and asked to borrow lamp oil from those who had some left. They said no, go buy their own. They left to buy their own, and were locked out of the marriage feast, meaning they went to hell. It is good to love others as yourself, but we love God more, and must live for God foremost not sacrificing our lives for mere men, in place of God to be damned to hell.

Trump reflects antichrist beliefs by demeaning women as sexual objects instead of people when Jesus teaches men will be thrown into hell should they even look at women with lust should they not repent.⁴⁷

Trump reflects Ant-Christ behavior by business strategies that will destroy the earth when God will “destroy those who destroy the earth,” meaning in hell on judgment day at the resurrection of the dead.⁴⁸

Trump reflects the “lawless one” the image of Satan by disregarding the rule of laws to love humanity, with the lawless reign of likes, desires, wants without regard to others unless it affects him.⁴⁹

Trump profanes my God’s holy name for his vanity, foreseeably upsetting me by hurting my God and other people I love through religious mis-leadership.

REASONS FOR GRANTING THE PETITION

The Court must reverse course to prohibit the establishment of religion to protect us from government forced worship by economic, social or physical

⁴⁷ Citing, Exhibits 17-19, 23,40, to Appendix F. See, *Matthew* 5:27-29, “You have heard that it was said, ‘You shall not commit adultery.’ But I tell you that anyone who looks at a woman lustfully has already committed adultery with her in his heart. If your right eye causes you to stumble, gouge it out and throw it away. It is better for you to lose one part of your body than for your whole body to be thrown into hell.”

⁴⁸ See, Exhibit A of Appendix F at 236-292, Exhibit 8 and Exhibit 45 of Appendix F, relating to the environment. Pursuant to *Genesis* 2:15, man is charged with the duty to care for the Earth. *Revelation* 11:18 teaches God will destroy those “who destroy the earth.” I believe, meaning destroy in hell. It is wrong to teach folks the way to hell via unconcern towards the environment and towards one another for comfort, convenience or coins, under the guise of heaven.

⁴⁹ Exhibits of App F.

government supported pressure making us no longer free to worship by the dictates of our conscience with threat of government incited force.

The elimination of freedom to choose to worship or not according to the dictates of our conscience is the first step to eliminating true worship of God. Next, may be to tax the church to teach the gospel of the mark of the beast, business greed, as worship, should this court ignore the Constitution in preference to selling our religious liberties through mere Executive Orders to government-partnered religious entities. Freedom is not for sale. If it is, none are free, but are slaves to those who tempt us, through government backing, to compromise our religion for business greed, essentially selling our souls for the bottom line or going without.

CONCLUSION The petition for a writ of certiorari should be granted.

Respectfully submitted.

Dated: August 23, 2021

Respectfully submitted,

/s/ Meghan Kelly
Meghan Kelly, Pro se
Not acting as an Attorney
34012 Shawnee Drive
Dagsboro, DE 19939
(Word Count 8999)

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 BJs, 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. "...1

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/

meghankellyesq@.../Inbox



Meg Kelly <meghankellyesq@yahoo.com>
To: Kruger, Katrina (Courts) <katrina.kruger@delaware.gov>,
Simmons, Arline (Courts) <arline.simmons@delaware.gov>
Cc: Meg Kelly <meghankellyesq@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 summonses 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 <meghankellyesq@yahoo.com>
Sent: Tuesday, October 13, 2020 6:46 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

meghankellyesq@.../Inbox



Simmons, Arline (Courts) <arline.simmons@delaware.gov>
To: 'Meg Kelly' <meghankellyesq@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 <meghankellyesq@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 <meghankellyesq@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 afford 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

meghankellyesq@.../Sent



Meg Kelly <meghankellyesq@yahoo.com>

Oct 15 at 12:20 PM

To: katrina.kruger@delaware.gov, katrina.kruger@delaware.gov

Cc: Simmons Arline (Courts) <arline.simmons@delaware.gov>

Meg Kelly <meghankellyesq@yahoo.com>

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 leeway 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 wimpy high voice. I need to become brave, 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) <cecelia.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

(1,956 unread) - meghankellyesq@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 <meghankellyesq@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 2020-0809 -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 <meghankellyesq@yahoo.com>

Sent: Monday, November 30, 2020 12:15 PM

To: Simmons, Arline (Courts) <Arline.Simmons@delaware.gov>; Kruger, Katrina (Courts)

(1,956 unread) - meghankellyesq@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. (See, 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

Cell: (410) 409-8874

cwaldhauser@de-lap.org

www.de-lap.org

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-Carol P. Waldhauser, Executive Director

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2021_05_24_11_52_37.pdf
296.6kB



2021_05_24_11_53_47.pdf
678.2kB

Delaware
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

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 unharden 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 unsatiated 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 notable, 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 [e7f2e41f-a6bd-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 xxxx9775
Transaction Type: Purchase
Auth Code: 748294

Merchant Contact Information

Delaware Supreme Court Attorney Registration
Wilmington, DE 19801
US
teros@doelegal.com

Re: Nick of time response/Glad your kid is okRe: 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

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Executive Director,

Delaware State Bar Association

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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 bough, 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 dissention 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

DORIS J. ADKINS
Chief Deputy Clerk
DEBRA J. ZATLOKOVICZ
Senior Court Clerk
RENÉ A. WORRELL
Senior Court Clerk
ELIZABETH A. FELICIANO
Senior Court Clerk

SUPREME COURT BUILDING
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DOVER DE 19901

(302) 739-4155
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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.

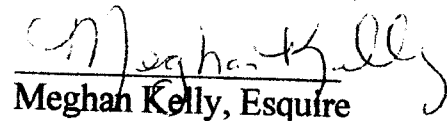
This Court does not have to believe as I do, to safeguard everyone's freedom to worship or not according to the dictates of their own conscience, without government sponsored persecution.

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

Smooth as
butter is in
the Bible concerning
leaders who mislead
with sweet nothing
Psalm SS: 21

Psalm SS: 21
His talk is smooth
as butter
war is in his
mouth

**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.

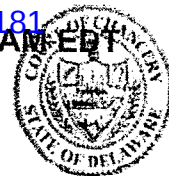
Freedom is not for sale. The government misbehaves by endorsing the premise those who do not conform to the beliefs of businessmen, women or entities may be turned away. Will business greed under the guise of Godliness become the religion of many more? Jesus Christ says, "You cannot serve both God and 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.

EXHIBIT

A



IN THE CHANCERY COURT OF THE STATE OF DELAWARE

Meghan Kelly,)

Civil Action No.:

Plaintiff)

v.)

Donald Trump, a.k.a. Donald J.)

Trump, a.k.a. President Trump)

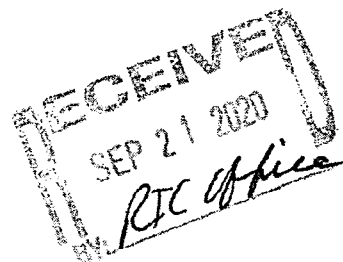
a.k.a. President Donald Trump, in his)

individual capacity, and in his)

official capacity as President of the)

United States)

Defendant.)



Complaint

MEGHAN KELLY

V.

DONALD TRUMP, A.K.A. DONALD J. TRUMP, A.K.A. PRESIDENT TRUMP, IN HIS INDIVIDUAL CAPACITY, AND IN HIS CAPACITY AS PRESIDENT OF THE UNITED STATES

Meghan Kelly, by and through her own pro se representation, brings this Verified Complaint, and contemporaneously therewith, Plaintiff's Temporary Restraining Order, and states as follows:

THE PARTIES

1. Meghan Kelly (also referred herein as, "Meghan," "Plaintiff," "I,") is an adult resident of the state of Delaware, residing at 34012 Shawnee Drive, Dagsboro, DE 19939.

2. Donald Trump, a.k.a. Donald J. Trump, a.k.a. President Trump, a.k.a. President Donald Trump, in his individual capacity and in his capacity as President

of the United States, (also referred herein as, "Trump," "Defendant," "President" or "President Trump") is an adult residing at the White House located at 1600 Pennsylvania Avenue NW, Washington, DC 20500.

JURISDICTION

3. This Honorable Court has jurisdiction over Plaintiff's claims pursuant to 10 Del. C. Section 341.

4. This Honorable Court has personal jurisdiction over President Trump pursuant to 10 Del. C. Section 3104 (c)(1). Trump "(t)ransacts ... business or performs ... character of work or service in the State."

5. Trump allegedly transacts businesses by forming entities in this state, by paying the state fees to maintain such entities, and by, or through, transacting businesses or services through such entities, including but not limited to, the business of seeking to form entities and seek the protection of Delaware laws for financial and or limited liability advantages for business gain.

6. According to an article in the Hill, "Donald Trump revealed ... that he has nearly 400 business entities registered in the state of Delaware, a state that has received renewed scrutiny in the wake of the Panama Papers leak as a domestic tax haven."

"During a campaign rally in Harrington, Delaware, the GOP presidential front-runner said he asked his staff to tell him how many businesses he has registered in the state."

Trump responded, 'We have 378 entities registered in the state of Delaware, meaning I pay you a lot of money folks. I don't feel at all guilty, OK?'

"He added that the figure 'might be off by a couple' since his aides come up with it on short notice." 'But you now what it is? It's a lot.' Citing, The Hill, *Trump has 378 businesses registered in Delaware*, By Harper Neidig - 04/22/16 04:55 PM EDT, <https://thehill.com/blogs/ballot-box/presidential-races/277326-trump-has-378-businesses-registered-in-delaware>, citing, <https://t.co/M16fuma0le>— ABC News Politics (@ABCPolitics) April 22, 2016.

7. In the alternative of, or in addition, this Honorable Court has personal jurisdiction pursuant to 10 Del. C. Section 3104 (c)(2), since Trump "Contracts to supply services or things in this State."

8. In the alternative of, or in addition, this Honorable Court has personal jurisdiction pursuant to 10 Del. C. Section 3104 (c)(4), since Trump caused "tortuous injury in the State (to the person of Meghan Kelly) or outside of the State by an act or omission outside the State (because Trump) regularly does or solicits business, engages in any other persistent course of conduct in the State or derives substantial revenue from services, or things used or consumed in the State.

9. Trump alleges he "brings a lot of money" to the state of Delaware through the alleged hundreds of entities he formed in Delaware. *Id.*

10. In addition, Trump is campaigning in Delaware, performing the business of wooing voters to get elected to the job position of the President of the

United States for not only his pecuniary gain, or trading of favors by barter or exchange, but for the business of governing.

11. Thus, Trump has significant business ties in Delaware, and acceptance of donations from businesses, or people who reside in Delaware, including but not limited to alleged representatives of Mountaire.

12. Members of the media reported individuals with ties to Mountaire, a chicken plant based in Sussex County, DE, was at one time, President Trump's fifth largest donor in 2016. (Citing, Delmarva Now, The Delaware News Journal, Group accuses Mountaire, a top Trump donor, of poisoning rural Delaware,

By Jessica Bies, June 20, 2019,

<https://www.delmarvanow.com/story/news/local/delaware/2019/06/20/group-accuses-mountaire-top-trump-donor-poisoning-rural-delaware/1508519001/>)

13. Campaigning, volunteering, fundraising, asking and giving or accepting donations is business, not true charity.

14. Trump seeks donations and volunteers in Delaware.

15. Trump, through his campaign, is campaigning in Delaware.

16. Trump may even pay people to run his campaign, the business of running for elections, by barter or exchange in currency, tempting him to serve

those who serve him, thereby serving himself, at the cost of choosing not to care for the people, those he is currently charged to care for, even at times exploiting the people he is charged to serve.

17. Trump has sufficient minimum contacts to the state of Delaware to satisfy Constitutional muster.

FACTS

I. BACKGROUND FACTS, SUBSTANTIALLY BURDENING RELIGION BY ETERNAL HARM, LOSS OF ETERNAL LIFE OF LOVED ONES DECEIVED BY THE DEFENDANT

18. Plaintiff, Meghan Kelly, repeats and incorporates by reference all of the above paragraphs and all of the below paragraphs, and the Exhibits and citations, the paragraphs refer to herein as admissible under nonhearsay and hearsay exceptions, including but not necessarily limited to, probative fact, state of mind, belief, present sense impression, periodical exception, excited utterance, admission by party opponent, as though set forth herein in the first instance.

19. This case arises upon President Trump's use of religion for his own vanity, meaning using religion in vain, for his own purpose, religious or otherwise, in violation of not only the Establishment and Free Exercise clauses of the first amendment of the US Constitution applicable to Defendant pursuant to the 5th

Amendment, and 42 USCS § 2000bb- § 2000bb 4, but also in violation of the religion his actions purport to support thereby, I believe, misleading people I love to hell, and substantially burdening my free exercise of religion, while performing the government function of presiding over the United States of America, as the President of the United States.

20. The Defendant committed the alleged conduct mentioned herein while wearing the cloak of government authority and, or bearing the sword that his word, or perceived desire, is a command, and, or, creating the illusion that Defendant supports Christianity, or supports God or God supports Defendant, Defendant's sins, or his policies.

21. The President's words and conduct supporting religion, as discussed below, were accepted as truth by many, thereby, instilling the belief, supporting the President's perceived thinking or conduct or his candidacy, despite all of his sinful misbehavior and in a way supporting his sins, as excusable without confession or without repentance, is supporting God, when I believe sinfully doing your own will leads to damnation. (Mark 8:34, ""Whoever desires to come after Me, let him deny himself (meaning not doing their own will, their own selfish, sinful desires, but exercise self-discipline, using their mind, their brain, which is their free will to do God's will, love), and take up his cross, and follow Me (by love in truth, not

lusts in deception).”); Also see, (Matthew 16:24, Luke 9:23 regarding the same message of personal sacrifice to follow Jesus).

22. In addition, I believe Trump misleads people I love to hell by creating the illusion his government authority is backed by God, or he supports the God I serve, by conduct discussed herein, thereby causing some people to think my God is not perfect or holy or even real. Since Defendant sins against God and man. Defendant is not perfect. Thus, Defendant is turning potential believers away from salvation from the second death. (See, Leviticus 20:26, God says “be holy because I am holy”); (Also see Matthew 5:48, Jesus commands, “Be perfect as your heavenly father is perfect,” with regards to unconditionally loving people outside of your own, even your enemy.)

23. Americans should worship or not according to the dictates of their conscience without the inherent threat of persecution created by Defendant’s support or suppression of religion.

24. But for Defendant’s conduct there would not be an additional two prong substantial burden and injury to my free exercise of religion causing: 1. Eternal harm, and 2. Chilling of my free exercise of religion by Defendant’s increased threat of government sponsored religious persecution and, or the actual

government sponsored government persecution for my attempts to freely exercise my religion, the later discussed in more detail further below.

25. Trump causes eternal harm to me.

26. Trump misleads and deceives many to sin, tempting them to reflect the image of Satan by living for self, by doing their own will, without unconditional love.

27. I believe people will be damned to hell but for Defendant's actions and inactions. I believe Defendant will damn people to hell by his misleadership, beyond our lifetimes, by touching humanity with the darkness and ignorance that damns, the sin against the Holy Spirit, unless this Honorable Court stops him through correction, maintaining separation of church and state.

28. An eternal injury suffered by me, is Defendant adversely affects my relationship with God since I believe we, God and I, will not be able to share a fuller type of love with the people the Defendant misleads to hell.

29. Since I love all people, I am harmed by the Defendant's conduct because I believe they will cease to exist. (See Jude 1:12, regarding people as "twice dead"); (See, Revelation 2:11, 20:6, 20:14 and 21:8, regarding the "second death," the final death); (See, Deuteronomy 30:19, 2 Kings 18:32, God says choose

life not death, meaning eternal life or permanent death at the resurrection of judgment. We have a choice.)

30. Thus, I believe I will sadly be prevented from loving them more fully for eternity. Accordingly, Defendant's words, and deeds supporting and suppressing religion by turning people away from salvation via my religion, harms me personally, by substantially burdening my ability to eternally love those Defendant misleads to hell, which is devastating to me.

31. Even if people are "remembered no more," I am still at a loss. I cannot love them, if they are destroyed, perishing in the second death. I believe I will miss out for eternity, even if I may not know it. (Citing, Ezekiel 21:32, "'You will be fuel for the fire, your blood will be shed in your land, you will be remembered no more; for I the LORD have spoken.'"); (Citing, Zechariah 13:2, "On that day, I will banish the names of the idols from the land, and they will be remembered no more," declares the LORD Almighty. "I will remove both the prophets and the spirit of impurity from the land."); (Citing, Job 24:20, "The womb forgets them, the worm feasts on them; the wicked are no longer remembered but are broken like a tree.")

32. God loves them. I believe God created every person because he loves them and for eternal life. (See, Wisdom 2:23-24 further provides "For God formed

man to be imperishable; the image of his own nature he made him. But by the envy of the devil, death entered the world, and they who are in his possession experience it."); (Also see, Wisdom 1:13, "God did not make death, nor does he rejoice in the destruction of the living..."); (Job 36:5, "God is mighty, but despises no one; he is mighty, and firm in his purpose."); (1 John 4:19, "We love because he first loved us.")

33. I am also injured because I recognize God's loss, and my heart aches for my Lord, especially since thousands are dying of Covid19, potentially under the deceit of the Defendant, to be doomed to hell.

34. With Defendant's acceptance of the cloak of government authority, his rights became more limited under the first amendment, so as not to chill the freedoms of those he serves by publicly supporting one religion over others, even injuring me indirectly by injuring those I love, while suppressing, persecuting and or ignoring the freedom of other religious beliefs or non-beliefs. (See, The Hill, Trump: Jews who vote Democrat show 'lack of knowledge or great disloyalty', by Brett Samuels, 08/20/19 03:38 PM, <https://thehill.com/homenews/administration/458135-trump-jews-that-vote-democrat-show-lack-of-knowledge-or-great>, Trump said "Jews who vote Democrat show 'lack of knowledge or great disloyalty, thereby suppressing Jewish people's faith by persecution I words."); (Also see, Trump calls for discrimination against

Muslims, By Jane C. Timm, 12/07/15 05:30 PM—UPDATED 12/07/15 09:08 PM
<http://www.msnbc.com/msnbc/trump-calls-discrimination-against-muslims>. These two articles may be submitted as evidence to show Defendant made my God look bad and turned folks who believe in other religions, or no religions off from Christianity because they reasonably and foreseeably may wrongly think my religion is naughty and mean. Since Defendant creates the illusion, he is Christian.)

35. This case is a case of first impression, with little judicial case law to be our guiding light. Therefore, I respectfully ask this Honorable Court to be our light.

36. The lineage of holiday display cases and possibly school teaching cases may be the closest applicable cases this Honorable Court may consider as it guides the nation on upholding the Constitutional freedoms of the people from government persecution, and specifically the freedom to worship or not, according to the dictates of each person's conscience, not the dictates of the President, or government agents, under the inherent threat of harm or persecution, should a person disagree with the government supported religious belief.

37. The United States Constitution protects the rights of the people to worship or not according to the dictates of their conscience, not the dictates of the government.

38. Trump is the President of the United States.

39. Trump accepted the cloak of government power and became bound to the reduced freedoms the Constitution grants to him in the form of limits upon his free exercise of religion, as President of the United States, when he was sworn in as President, in order not to diminish the Constitutional freedoms of those he serves, the people residing in America, regardless of gender, race, religions, age and place of origin.

40. Trump abused and misused his authority as President and violated his oath of office, by creating the appearance of government backing one religion over other religions.

41. In exchange for the cloak of government power, government servants, employees and agents, including President Trump, have reduced freedoms in order not to chill the Constitutional freedoms of those he, and other government agents, serve.

42. In exchange for the cloak of government power, government servants, employees and agents, including President Trump, are bound by oath to uphold the Constitution, including the Constitutional freedoms of those with different beliefs and views.

43. The Constitution is not a license for government agents, such as Trump to persecute people, either socially, economically or violently, nor is it a license for government agents to encourage others to persecute people based on religious beliefs or perceived religious beliefs which differ from government actors, or agents such as Defendant, President Trump.

II. ADDITIONAL LEGAL FACTS ON PLAINTIFF'S RELIGION AND FACTS ON DEFENDANT REFLECTING THE IMAGE OF SATAN BY PLACING SELF FIRST, AND TEACHING OTHERS TO DO THE SAME BY HIS EXAMPLE, MISLEADING THEM TO HELL UNDER THE GUISE OF GODLINESS

44. My personal religious beliefs are in issue. So, I am providing additional facts concerning my religion, and my beliefs.

45. I am a Christian.

46. I believe in God, the Father.

47. I believe in God the son, Jesus Christ.

48. I believe in God the Holy Spirit.

49. I believe that God loves me and all of humanity so much that he reveals himself in three different ways, the Father, the son, Jesus, and the Holy

Spirit, to shed light, to guide us to eternal life, regardless of whether we reject his love, in the form of his guidance to save us from the final death.

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

51. I find guidance in Jesus, the Word made flesh.

52. I find guidance in the Holy Spirit.

53. I find guidance in God, the father.

54. I find guidance in the Bible.

55. Pursuant to the Bible, Jesus says, "The greatest among you is your servant." (Citing, Matthew 23:11). Accordingly, living to serve self is not great.

56. In fact, I believe the root of corruption in both business and government is serving those who serve you, thereby serving yourself, instead of the people you are supposed to serve. (Also see, Matthew 20:26 and Mark 10:43, Jesus says, "“whoever wants to become great among you must be your servant”"); (Also see, Luke 22:26, Jesus teaches, "“But you shall not be like them. ... (T)he one who leads like the one who serves.”")

57. I believe living for self, and your own family, your own community and for those who affect, serve and benefit you, thereby living for self, without regard to others reflects the image of Satan. (Please see, Isaiah 14:13-14, Satan wanted to live for himself. He wanted to be his own God, to be as high as God. Satan did not want to lay down his life for God, by in part, loving others as himself, even outsiders, even the least of these.); (See Genesis 3:1-6, Satan tempted Eve to be like her own God too, allegedly “knowing good from evil,” to reflect the image of Satan, instead of placing God first by obeying God. God loves her and desired to prevent harm towards her. The command was for her benefit, like the commands are for our benefit to teach us the way through love to escape death. She died.); (Please see, 2 Corinthians 4:4, and the Book of Job, Satan the lower case “god of this world” has authority to confuse humanity, through people, desperate conditions and the worldly desires, to teach people evil is good and good is evil. So, folks will be damned to hell for their misunderstanding.); (See Matthew Chapter 13, Only those who understood were not burnt up to be destroyed. Misunderstanding may eternally kill you.); (Also see, Matthew 4:1-11, Satan tempted Jesus to live for self too. Jesus did not give into the temptation but lived to serve, God and humanity by being the light of the way to eternal life); (Also see, Ezekiel 16;49, People were damned to hell for their unconcern "they did not help the poor and needy."); (Also see Matthew 13:18-19 "the worries of this life, the

deceitfulness of wealth and the desires for other things come and choke the word, making it unfruitful," meaning those people will be burnt up in hell.); (Further see, Luke 17:26-34 where Jesus also gave us examples of people merely caring for their own family and their own needs, working, buying and selling, eating and drinking, marrying and given into marriage before they were destroyed to be damned to hell for giving into tempting distractions of making money and making merry, and, or the anxieties of life while failing to understand the true purpose of life and eternal life, loving God and loving others as yourself, not exploiting others, outsiders to serve your greed); (Also see, Matthew 7:21 "Only those who do the will of God, go to heaven.); (Also see, Matthew 16:24, Luke 9:23, Matthew 10:38, and Mark 8:34, regarding true followers must stop doing what they desire to do, and do what God desires instead. Loving others even if it is painful.)

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

59. I believe people sin against God when they merely serve their own children and families, and those who serve or affect them, instead of all the people they are appointed to serve in their position of life.

60. Jesus said even evil people care for their children. (See, Matthew 7:9-12, "Which of you, if your son asks for bread, will give him a stone? Or if he asks for a fish, will give him a snake? If you, then, though you are evil, know how to give good gifts to your children...")

61. I believe Defendant places himself first, reflecting the image of the evil one.

62. Appointing family members to official government positions is a sin against God and man by creating the appearance of favoritism and also by actual favoritism. (See, James 2:1, "do not show favoritism."); (James 2:9, "But if you show favoritism, you sin and are convicted by the law as transgressors."); (Deuteronomy 16:19, "Do not deny justice or show partiality. Do not accept any bribes, for a bribe blinds the eyes of the wise and twists the words of the righteous."); (Proverbs 18:5, "Showing partiality to the wicked is not good, nor is depriving the innocent of justice."); (Proverbs 24:23, "These also are sayings of the wise: To show partiality in judgment is not good."); (Malachi 2:9, "So I in turn have made you despised and humiliated before all the people, because you have not kept My ways, but have shown partiality in matters of the law."); (Job 34:19, "who shows no partiality to princes and does not favor the rich over the poor, for they are all the work of his hands?"); (Job 13:10, "Surely He would rebuke you if you secretly showed partiality.").

63. Defendant appointed his daughter, Ivanka Trump, and son in law, Jared Kushner, for government positions with the White House, creating the appearance of serving family first which I believe misleads people to hell by believing Trump's evil example is good or Godly. (See, The Hill, Ivanka Trump will have an official White House position, By Olivia Beavers, 03/29/17 04:57 PM EDT, <https://thehill.com/homenews/administration/326400-ivanka-trump-will-have-an-official-white-house-position>, relating to appointing Ivanka to a government position, and noting the appointment of Jared Kushner, the Defendant's son in law.).

64. I believe we are commanded to love others as ourselves, not love our own families more than others, by exploiting our position at the expense of those we are charged in order to serve, to instead serve our own family in positions of global influence where there is the possibility of trading of favors, at Americans' expense.

65. I believe Defendant sins against God and man by his partiality towards his own family or those who serve his interests, at the expense of those he is charged to serve, thereby misleading others to hell by teaching them to love others less than they love their own.

66. Jesus said even those without God love those who love them; and greet those who greet them. (See, Luke 6:32-35, "if you love those who love you, what credit is that to you? Even sinners love those who love them. And if you do good to those who are good to you, what credit is that to you? Even sinners do that. But love your enemies, do good to them, and lend to them, expecting nothing in return. Then your reward will be great, and you will be sons of the Most High; for He is kind to the ungrateful and wicked"); (See also, Romans 12:14); (See Matthew 5:44-45, "But I tell you, love your enemies and pray for those who persecute you, that you may be sons of your Father in heaven."); (Matthew 5:46-47, "If you love those who love you, what reward will you get?... And if you greet only your people, what are you doing more than others? Do not even the pagans do that?")

67. I believe God calls us to love God foremost and to love others, even those outside of our own, even our enemies, as ourselves. (See, Matthew 22:36-40, The greatest command in the bible is to love God. Subordinately, love others as yourself. All commands are weighted on these.)

68. I believe leaders who serve themselves and those who serve them are not good leaders. They are misleaders and deceivers, not public servants. They mislead and deceive those they purport to serve, to instead exploit them, to serve themselves, by placing self first. I believe Servants of Self are Servants of Satan.

They not only harm those they are charged to care for in this life, they also mislead and deceive others to become Servants of Self, Servants of Satan too, thereby leading many to hell too.

69. I believe Defendant serves himself foremost, and those who serve him at the expense of those he is charged to serve.

70. I believe Christians are commanded to place God first by loving God and living for God foremost, and subordinately, Christians are commanded to love others as ourselves, not less than ourselves, not loving ourselves more than others.

71. I believe we live or die for God. Citing, Romans 14:8.

72. I believe those who live and die for self or for mere people instead of God do not go to heaven.

73. I believe Jesus was not kidding when he said “you who love mother and father more than me are not worthy of me.” “You who love son and daughter more than me are not worthy of me are not worthy of me.” (Citing, Matthew 10:37).

74. I believe Jesus was not kidding when he said unless your “righteousness exceeds that of the scribes you will” not go to heaven. (Matthew 5:20.)

75. I believe our righteousness exceeds that of the scribes by our trust in God through his Word, accessible through the Father, son and Holy Spirit.

76. I believe the Bible teaches Abraham believed what God said. His belief was attributed to righteousness. (Citing, Genesis 15:6.)

77. Abraham listened to God to the point he was willing to sacrifice his own son. (Citing, Hebrews 11:17).

78. I believe this righteousness was attributed to Lot when he listened to God's word through messengers, the angels. He did not even turn around when his wife turned into a pile of salt. (See, Genesis 19:26).

79. In the Parable of the ten virgins in Matthew 25: 1-13 Jesus tells a story of ten virgins traveling to a marriage feast. All ten virgins had lamp oil. Five ran out, and asked those who had oil to give them some. Those with oil responded rightly by telling those without, no, go buy your own or we will not have enough ourselves. They did not even say sorry. Those who bought the lamp oil did not get back in time and were locked out of the marriage feast, meaning they went to hell.

80. I believe Jesus teaches us by this parable that: yes, we love others, and yes, we love ourselves, but we love God more, and live for God foremost, not for self or others. Id.

81. Trump's campaign includes the Slogan "America First."

77. Trump says "as the President of the United states I will always put America First." (Citing, The Hill Trump: I will always put America first, By Max Greenwood, - 09/19/17 10:33, <https://thehill.com/homenews/administration/351320-trump-i-will-always-put-america-first>).

82. I believe Trump's America first policy, teaches people to learn to place themselves first, like the devil in Isaiah Chapter 14, thereby teaching them to be children of the devil, instead of children of God, damning them to hell for evil thinking or evil doing.

83. I believe Trump teaches folks not to place God first, under the guise of Godliness, by failing to teach those he serves to care about others, regardless of race, religion or place of origin, as they care for themselves.

84. I believe President Trump's focus on putting self first, by teaching Americans to put America first, misleads and deceives people to reflect the image of Satan, by learning to love money and merriment, profit and pleasure more than other people.

85. Instead of loving one another, people wrongly learn to love money to the extent that they are willing to harm and destroy human life, and eternal life to serve their fleeting fancies for funding and temporary desires.

86. I believe President Trump's winning at all costs, even at the cost of cheating, violating greater laws, of justice, mercy and faithfulness (See Matthew, 23:23), makes us all lose, modeling the reflection of the image of Satan called the "lawless one" by his disregard of laws that teach us to care about other people. (Citing, 2 Thessalonians 2:8, also see Psalm 101:3); (I define evil as absence of love because "God is love." Citing, 1 John 4:16, People without God in their hearts have an emptiness they attempt to fill with fleeting fancies, fleeting feelings, fleeting funding or other idols in place of God's love.); (See Exhibit 8, including articles of impeachment I proposed to impeach Trump for violating certain laws. These are evidence of my belief in Defendant's lawlessness.)

87. I believe President Trump teaches the image of Satan, the "lawless one," as good, by teaching everyone for themselves, lawlessness, under the facade of greatness or business, but in truth greed, without love or concern for outsiders or those beyond their own, misleading those he serves to harm and hell. (Citing, 2 Thessalonians 2:8-9).

88. It makes me sad because I believe Defendant President Trump violates the First Amendment and God's laws by using God's name for his own vanity, meaning his own purpose in place of God's purpose, to serve power and profit under the guise of God thereby misleading people to harm and hell.

89. Sadly, I believe people go to hell for their confusion. Satan, the lower case” god of this world,” confuses to kill eternally. (Citing, 2 Corinthians 4:4); (Also see 2 Corinthians, Chapter 4 to confirm by reading the entire chapter.)

90. I believe the prophets in the Old testament, John the Baptist, Jesus and the apostles all bravely and courageously confronted leaders who did evil, by serving themselves instead of those they were charged with serving.

91. In Ezekiel Chapter 34:1-10, God scolds leaders, called shepherds, who take advantage of the sheep, meaning the people they are charged to care for, to serve themselves instead of caring for them. "Woe to you shepherd of Israel who only take care of yourselves! Should not shepherds take care of the flock? You eat the curds, clothe yourself with wool and slaughter the choice animals, but you do not take care of the flock...." Id. (Also see, Jeremiah 23:1, and Zechariah 11:17); (Also see, Jeremiah 50:6, "My people have been lost sheep; their shepherds have led them astray and caused them to roam on the mountains. They wandered over mountain and hill and forgot their own resting place."); (Isaiah 53:6, "All we like

sheep have gone astray; we have turned everyone to his own way; and the LORD hath laid on him the iniquity of us all.”); (Jeremiah 23:11, ‘Both prophet and priest are godless; even in my temple I find their wickedness,’ declares the LORD.”); (Jeremiah 5:31, “The prophets prophesy falsely, and the priests bear rule by their means; and my people love to have it so: and what will ye do in the end thereof?”); (Jeremiah 6:13, “For from the least of them to the greatest, all are greedy for gain. From prophet to priest, all practice deceit.”); (Jeremiah 23:11-15, “For both prophet and priest are profane; yea, in my house have I found their wickedness, saith the LORD...”); (“Isaiah 56:10-12, “His watchmen are blind: they are all ignorant, they are all dumb dogs, they cannot bark; sleeping, lying down, loving to slumber...”); (See, Isaiah 3: ... “your leaders mislead you; they send you down the wrong road”); (See, Isaiah 9:16, “For the leaders of this people cause them to err; and they that are led by them are destroyed.”)

92. I believe President Trump sins against God and man by harming others to serve self.

93. President Trump’s ignorance is not innocence. I believe people go to hell for their ignorance, encouraging hardness of heart, absence of love which is absence of God. Since, I believe God is love. (See, Ephesians 4:18, “They are darkened in their understanding and separated from the life of God because of the ignorance that is in them due to the hardening of their hearts.”); (See, Hosea 4:6,

“my people are destroyed (in hell) from lack of knowledge. "Because you have rejected knowledge, I also reject you as my priests; because you have ignored the law of your God, I also will ignore your children.”).

94. I believe President Trump chooses not to use his free will, which is his brain, his mind, to choose to think, to care, to love others as himself.

95. I believe President Trump loves others outside of his own less than he loves himself. (See, On Russian bounties, what did Trump know and when did he know it?, MSNBC, By Steve Benen, June 30, 2020, 8:00 AM EDT <https://www.msnbc.com/rachel-maddow-show/russian-bounties-what-did-trump-know-when-did-he-know-n1232506>, Defendant President appeared to be willing to sell the souls of troops to serve himself, or the in the alternative, it appeared the Defendant did not care enough about the American troops with bounties on their heads to speak up on their behalf.)

96. The Holy Spirit, via God, via my conscience, teaching me to care, to love, is leading me to do the same as the prophets, to correct the President, in hopes to heal not only the victims of the harm he causes in this life and to prevent eternal harm in the next, but to heal his ugly heart with God's truth in love, not deception. God loves other people too, even your enemy, people of other political

affiliations, races, religions, and places of origin, even if they do not know God, even if they have not accepted God's love.

III. FACTS, THE HOLY SPIRIT, DISCERNING A GLIMPSE OF GOD AND MAN'S HEARTS, JUDGING CORRECTLY THROUGH THE HOLY SPIRIT, AND ADDITIONAL LEGAL FACTS ON CAUSATION AND FAITH

97. My religious beliefs are genuine.

98. The Holy Spirit led me to file complaints against Justice Kavanaugh to uphold the integrity of the courts from the appearance of impropriety. (See, Exhibit 1, letters confirming Meghan Kelly filed ODC complaints); (Amos 5:15, "Hate evil, love good; maintain justice in the courts. Perhaps the LORD God Almighty will have mercy on the remnant of Joseph."); (Amos 5:12, "There are those who oppress the innocent and take bribes and deprive the poor of justice in the courts."); (Zechariah 8:16, "Speak the truth to each other, and render true and sound judgment in your courts").

99. After all, I believe, "justice, mercy and faithfulness" are more important commands than laws relating to mere money per Jesus Christ. (Citing, Matthew 23:23).

100. I believe justice is done by correcting leaders like Defendant who mislead some of those they serve to harm and hell. (See, Matthew 23:15, Jesus scolded leaders telling them they were making their converts “twice as much a child of hell as (they) are.”)

101. The Holy spirit led me to file a lawsuit against the Democrats in the state of Delaware in order not to compromise my belief in Jesus’s teachings to run for office. (See, Exhibit 2, Court stamped Complaint relating to Chancery Court Case Number 2020-0517).

102. My faith in the Holy Spirit is genuine. I confronted the Delaware Supreme Court when they violated my religious rights to affirm instead of swear into the Delaware Bar. (See Exhibit 3).

103. I twice rejected appointments to family law matters as violating my religious beliefs (See Exhibit 4).

104. I confronted the Courts in Delaware per the attached letter concerning impartiality and bias. (See Exhibit 5); (Also see, Leviticus 19:15 "You must not pervert justice; you must not show partiality to the poor or favoritism to the rich; you are to judge your neighbor fairly"); (see, Exodus 23:6, "You shall not deny justice to the poor in their lawsuits."); (see, Deuteronomy 16:19, "Do not deny justice or show partiality"); (also see, Deuteronomy 1:17, "Show no partiality in

judging; hear both small and great alike. Do not be intimidated by anyone, for judgment belongs to God. And bring to me any case too difficult for you, and I will hear it.").

105. I even shared my view on what using the name of God in vain means when I proposed a suggestion to Senator Tom Carper of Delaware. (See, Exhibit 6). I believe it means using the name of God, or religion or scripture for man's purpose instead of a true religious purpose.

106. The Holy Spirit is revealed to me because I am born again per Jesus Christ's teachings in John Chapter 3. Per John 3:3-8, Jesus said;

“Very truly I tell you, no one can see the kingdom of God unless they are born again.’ ‘How can someone be born when they are old?’ Nicodemus asked. ‘Surely they cannot enter a second time into their mother’s womb to be born!’ Jesus answered, ‘Very truly I tell you, no one can enter the kingdom of God unless they are born of water and the Spirit. Flesh gives birth to flesh, but the Spirit[b] gives birth to spirit. You should not be surprised at my saying, You must be born again. The wind blows wherever it pleases. You hear its sound, but you cannot tell where it comes from or where it is going. So it is with everyone born of the Spirit.’”

107. I believe Jesus.

108. I do not know all things, but through the Holy Spirit I gain some understanding of truth, and of God's will and design.

109. Through the Father, Son and the Holy Spirit, God is accessible to me, and to all of humanity should they not harden their hearts. (See, Matthew 28:1,

“Therefore go and make disciples of all nations, baptizing them in the name of the Father and of the Son and of the Holy Spirit” God reveals himself to us in three ways through, the Father, Son and Holy Spirit, because he loves us and seeks to guide us to save us from hell.).

110. Through the Holy Spirit we are able to know God.

111. I know God.

112. I have accepted the Holy Spirit into my heart.

113. The Word of God, also known as the Holy Spirit, is also revealed to us through other people, born again, including the people mentioned in the Bible, and the writers of the Bible who accepted God, the Spirit of Truth, in their hearts by laying down their will to understand and to do God's will by their love.

114. I believe we are able to know God better through the Holy Spirit revealed through the writers and people in the Bible by reading or listening to the Bible.

115. I believe they accepted the Holy Spirit in their hearts, like I did. For example, (See, Daniel 13:45 "God stirred up the Holy Spirit of a young boy named Daniel."); (See, Genesis 41:38 'So Pharaoh asked them, "Can we find anyone like this man, one in whom is the spirit of God?"); (See, Exodus 31:3 and Exodus 35:31, “and I have filled him with the Spirit of God, with wisdom, with

understanding, with knowledge and with all kinds of skills”); (See, Numbers 11:17, “I will come down and speak with you there, and I will take some of the power of the Spirit that is on you and put it on them.”); (See, Numbers, 11:25, “Then the LORD came down in the cloud and spoke with him, and he took some of the power of the Spirit that was on him and put it on the seventy elders. When the Spirit rested on them, they prophesied--but did not do so again.); (See, Deuteronomy 34:9, The Holy Spirit is also called the "spirit of Wisdom,"); (See, Judges 3:10, The Holy Spirit is also called the "spirit of the Lord" The holy spirit works the same in the Old testament too.); (Also see, Romans 8:14, "those who are led by the Spirit of God are children of God.”); (Also see, Psalm 51:12, “Restore to me the joy of Your salvation And sustain me with a willing spirit.”); (See, Wisdom 1:4-6, “Because into a soul that plots evil wisdom does not enter, nor does she dwell in a body under debt of sin. For the holy spirit of discipline flees deceit and withdraws from senseless counsels and is rebuked when unrighteousness occurs. For wisdom is a kindly spirit, yet she does not acquit blasphemous lips; Because God is the witness of the inmost self and the sure observer of the heart and the listener to the tongue”); (See the entire book of wisdom too. The Wisdom described in this book is another name for the Holy Spirit); (See, Matthew 1:18, “This is how the birth of Jesus the Messiah came about: His mother Mary was pledged to be married to Joseph, but before they came

together, she was found to be pregnant through the Holy Spirit.”); (See, James 1:5 “If any of you lacks wisdom, you should ask God, who gives generously to all without finding fault, and it will be given to you.” Wisdom meaning the Holy Spirit, the Word that guides our steps with a light on the narrow way.); (Also see, Luke 11:13 "If you then, being evil, know how to give good gifts to your children, how much more will your heavenly Father give the Holy Spirit to those who ask Him?" If we ask God to be the Lord of our life, if we ask God into our hearts and lay down our will, our desires, for God’s will, which is eternal life through love, truth, justice, mercy and faithfulness, he will not reject us.); (See, Matthew 12:32 "And whoever speaks a Word against the Son of Man will be forgiven; but whoever speaks against the holy Spirit will not be forgiven, either in this age or in the age to come."); (See, Mark 13:11, “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.”); (Mark 12:36, “David himself, speaking by the Holy Spirit, declared: "The LORD said to my LORD: "Sit at my right hand until I put your enemies under your feet.""); (See also, Mark 3:29, “but whoever blasphemes against the Holy Spirit will never be forgiven; they are guilty of an eternal sin.” This means hardening your heart to loving God and others as yourself, even those who inconvenience others you. I believe this means not accepting God in your heart and not reflecting love, God’s image.); (Matthew

3:11, John the Baptist said, “I baptize you with[a] water for repentance. But after me comes one who is more powerful than I, whose sandals I am not worthy to carry. He will baptize you with[b] the Holy Spirit and fire.”); (John 14:26, “But 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 said to you.”); (John 16:13, “But when he, the Spirit of truth, comes, he will guide you into all the truth. He will not speak on his own; he will speak only what he hears, and he will tell you what is yet to come.”); (John 14:17, “the Spirit of truth. The world cannot accept him, because it neither sees him nor knows him. But you know him, for he lives with you and will be in you.”); (Ephesians 1:13, “And you also were included in Christ when you heard the message of truth, the gospel of your salvation. When you believed, you were marked in him with a seal, the promised Holy Spirit.” This seal can be broken should we sin against the Holy Spirit without repentance and reconciliation with God by love. It is possible to choose to turn away from God like King Solomon who wrote two books in the Bible did. I hope he repented, but do not know.); (See, 2 Peter 2:21 “It would have been better for them not to have known the way of righteousness, than to have known it and then to turn their backs on the sacred command that was passed on to them.” We most definitely can lose the way to salvation. Just because God knows everything at once does not eliminate our freedom of choice.); (See, Hebrews 3:14, “We have come to share in

Christ, if indeed we hold our original conviction firmly to the very end.”); (See, also, Matthew 24:13, “but the one who stands firm to the end will be saved.”); (1 John 4:6, “We are from God, and whoever knows God listens to us; but whoever is not from God does not listen to us. This is how we recognize the Spirit of truth and the spirit of falsehood.”); (And see, John Chapter 3, Regarding being born again, being born of flesh in human life and of spirit receiving eternal life the same as Moses and Daniel did in the Old Testament.).

116. In the same way the Holy Spirit, God, is now accessible to all mankind, as explained in Jeremiah Chapter 31, with the death and resurrection of Jesus Christ, if people choose not to harden their hearts to love, to God for “God is love”. (Citing, 1 John 4:8); (See, Jeremiah 31-34, “‘The days are coming,’ declares the Lord, when I will make a new covenant with the people of Israel and with the people of Judah. It will not be like the covenant I made with their ancestors when I took them by the hand to lead them out of Egypt, because they broke my covenant, though I was a husband to them.’ This is the covenant I will make with the people of Israel after that time, declares the Lord. I will put my laws in their minds and write it on their hearts. I will be their God, and they will be my people. No longer will they teach their neighbor, or say to one another, ‘Know the Lord,’ because they will all know me, from the least of them to the greatest,’ declares the Lord. ‘For I will forgive their wickedness and will remember their sins no more.’”); (Also see,

Romans, 9:6-8 “It is not as though God’s word had failed. For not all who are descended from Israel are Israel. Nor because they are his descendants are they all Abraham’s children. On the contrary, ‘It is through Isaac that your offspring will be reckoned.’ In other words, it is not the children by physical descent who are God’s children, but it is the children of the promise who are regarded as Abraham’s offspring.” It is not by bloodline but I believe by faith, the same faith as those examples in Hebrews Chapter 11, the same faith Abraham manifested.); (See also, Romans 4:3, and Galatians 3:6, Abraham believed God was not kidding and that was attributed to him as righteousness.); (Also see, Romans 2:15 With regards to those without God or religion or other religions, their conscience will defend them or condemn them on judgment day.); (Also see, Galatians 3:28 "There is neither Jew nor Gentile, neither slave nor free, nor is there male and female, for you are all one in Christ Jesus.); (See, 1 John 4:8. The laws taught us we are loved and to love for "God is love." We have the free will to choose to reflect the image of God by our love or the image of the devil by our absence of love, replaced by our lusts, our own will, including but not limited to our own desires, living for self, putting self or family first, or people pleasing or living for something else in place of God, in place of love, such as not desiring to rock the boat, to avoid conflict.); (See also, 1 John 4:16 "God is love"); (See, Matthew 10:34-37, Jesus Citing, Micah 7:6, with regards to rocking the boat. “Do not suppose that I have

come to bring peace to the earth. I did not come to bring peace, but a sword (of his Word, not a weapon). For I have come to turn “a man against his father, a daughter against her mother, a daughter-in-law against her mother-in-law. A man’s enemies will be the members of his own household.” “Anyone who loves their father or mother more than me is not worthy of me; anyone who loves their son or daughter more than me is not worthy of me. Whoever does not take up their cross and follow me is not worthy of me. Whoever finds their life will lose it, and whoever loses their life for my sake will find it.); (Also see, Micah 7:5-6 regarding placing God, the Holy Spirit first above your closest loved ones.).

117. Jesus proclaims: "By this everyone will know you are my disciples, if you love one another." (John 13:35.)

118. That love is how we choose to reflect God’s image instead of the image of the evil one. (See, Genesis 1:26-27, regarding creating man in the image of God.).

119. I believe sin means absence of love in our thinking or doing.

120. I believe even if we confuse serving the lusts or sinful desires of others as love, sin is still evil, and may damn people to hell without a cleaning of our hearts through repentance.

121. Jesus gave us the new Command to help us to better understand the narrow way, to elaborate on his command “love your neighbor as yourself.” (Citing, Matthew 22:39); (See, Leviticus 19:16-18, Jesus cites an old command, but clarifies by teaching a neighbor is all of humanity, not merely fellow Israelites); (See, Luke 10:29- 37, I believe Jesus explains a neighbor in this parable was someone outside of their own by their love, in response to the question of who is my neighbor, meaning all people by our love.)

122. Jesus said I give you a new command. “Love one another,” meaning every person, even your enemies, even your business competitors, even out of states, like folks from Pennsylvania. (Citing, John 13:34).

123. It takes the choice to use your free will, which is your brain, your mind, to think, to seek truth, to care, to know God, to love God foremost and to love one another subordinately. (See, Matthew 22:37-40 regarding the greatest commandment, love God and the second greatest commandment love your neighbor as yourself, not less than yourself.)

124. We clearly learn we have a choice in Sirach 15:11-17 which provides:

“Don't claim that he has misled you; he doesn't need the help of sinners to accomplish his purposes. The Lord hates evil in all its forms, and those who fear the Lord find nothing attractive in evil. When, in the beginning, the Lord created human beings, he left them free to do as they wished. If you want to, you can keep the Lord's commands. You can decide whether you will be loyal to him or not. He has placed fire and water before you; reach

out and take whichever you want. You have a choice between life and death; you will get whichever you choose.” (Also see, Genesis 4:7 “If you do what is right, will you not be accepted? But if you do not do what is right, sin is crouching at your door; it desires to have you, but you must rule over it.” I believe we all have the power to use our free will, our brains, our minds to turn away from sin no matter what businessmen sell you).

125. I believe, ignoring your conscience that tugs at your mind and heart, is ignoring the Holy Spirit, hardening your heart to God's will, to do your own will, misbehaving like Satan misbehaves according to Isaiah chapter 14. Jesus explained we must use all of our "mind(s)" to love God. (Citing, Jesus in Mark 12:30, Mark 12:33, Matthew 22:37, and Luke 10:27.)

126. We love God, in part, by seeking to understand God's heart. Admittedly we know only partially. (See, 1 Corinthians 13:12, "For now we see only a reflection as in a mirror; then we shall see face to face. Now I know in part; then I shall know fully even as I am fully known.")

127. Jesus teaches we know man's heart by his words. (See, Matthew 12:34-37, Jesus stated, "You brood of vipers, how can you who are evil say anything good? For the mouth speaks what the heart is full of. A good man brings good things up in him, and an evil man brings evil things out of the evil stored up in him. I tell you everyone will give an account for every careless word they have spoken. For by your words you will be acquitted, and by your words you will be condemned."); (See also, Matthew 15:18, "But the things that come out of a

person's mouth come from the heart, and these defile them."); and (Luke 6:45, "The good things out of the good treasure of his heart, and the evil man brings evil things out of the evil treasure of his heart. For out of the overflow of the heart, the mouth speaks."); (Also see, Proverbs 18:21 "Life and death are in the power of the tongue, and those who love it will eat its fruit.").

128. Accordingly, we know God, by God's Words accessible through the father, son and the holy spirit, including the Bible and the Word made Flesh, Jesus Christ.

129. I believe the Holy spirit through the Word of God, the Bible, teaches we gain a glimpse of God's heart by his Word, through the Holy Spirit within those who wrote or are written about in the Bible.

130. That is why King David was called a man after God's own heart because he sought to gain a glimpse of God's will, God's heart's desires, by studying his Word, revealed through his laws in the Bible. (See, Acts 13:22, "I have found David son of Jesse, a man after my own heart; he will do everything I want him to do."); (See, including but not limited to, Psalm 119:20, Psalm 119:30, Psalm 119:91, Psalm 10:5, Psalm 119:43, Psalm 119:175 David talks about seeking to know and live God's laws in the Book of Psalms.).

131. 1 Corinthians 2:15 provides, "He who is spiritual (a person with the Holy Spirit) judges all things, but such a person is judged by no one."

132. Additionally, in John 7:24, Jesus says, "Stop judging by mere appearances, but instead judge correctly." I think this means through the lens of the Holy spirit, by how God teaches us to think, to examine people's hearts.

133. I believe Jesus is disappointed in people for merely judging physical things correctly, but not judging spiritual things. (See, Matthew 16:3 where God scolds religious leaders for misunderstanding.)

134. The Holy Spirit helps us to see things how they actually are.

135. I believe the bible teaches many people are evil, not good, choosing to reflect the image of Satan instead of God because they are misled by men like Defendant President Trump.

136. Children are born evil like we all are, and children are most in danger of hell should they die without the opportunity to be born again per Jesus in John chapter 3. (See, Ezekiel 9:4-6, I believe these verses teach children will be damned to the second death on judgment day too. Besides Jesus says no one can go to heaven unless they are born again in John Chapter 3. Since children are afforded fewer opportunities to be born again, they are most likely to be damned to the final death which makes me sad.)

137. Matthew 18:6, Jesus says, “It would be better for them to be thrown into the sea with a millstone tied around their neck than to cause one of these little ones to stumble,” meaning misleading children off of the narrow path to heaven onto the broad path to hell. (Also see, Luke 17:2, and Mark 9:42. For companion citations); (Matthew 7:13-14, “Enter through the narrow gate. For wide is the gate and broad is the way that leads to destruction (meaning hell, the final death), and many enter through it. But small is the gate and narrow the way that leads to (eternal) life, and only a few find it.” The way is narrow, uncompromising full of integrity, not false assurance and false comfort.)

138. It is a great sin to mislead and deceive people to serve sins to be damned to hell.

139. I am concerned about everyone’s eternal lives, especially the little children as they watch Defendant Trump misbehave, or their elder’s support of Defendant and so indirectly support his misbehavior under the guise of good or God. I believe, but for Defendant, little children, as well as adults, are misled to hell too.

140. I believe more people will go to hell because they are deceived by the Defendant, unless the veil of deception is somehow lifted by this Honorable Court. (See Matthew 27:51, I think the veil being torn at the death of Jesus symbolizing

all of humanity has access to God through the Holy Spirit for it is written on all people's hearts per Jeremiah 31, to accept or harden our hearts to); (Also see, 2 Corinthians 4:3, "And even if our gospel is veiled, it is veiled to those who are perishing.")

141. I believe Defendant Trump will mislead people to hell, beyond his or my lifetime, unless this Honorable Court corrects Defendant Trump.

142. I believe future federal government agents, such as the President, will mislead people to hell because of Defendant Trump's bad example, beyond my life time, if they are permitted to use religion for their own vanity, regardless of which religion, thereby inherently suppressing certain religions, and supporting others to support their personal purposes under the guise of religion, while acting under the cloak of government authority.

143. The President's public support for God is causing de facto government sponsored private religious persecution.

144. I believe Christians should obey the greatest command to love God by living for God and subordinately to love one another. Love does not encourage harm in this life and eternal life for mere material convenience. (See, Romans 13:10).

145. I believe our purpose is bigger than anyone in this world or anything in this world. We were meant to live forever, to feel a fuller type of love with God and one another. Yet, we all, individually, choose eternal life or the final death. (See, Deuteronomy 30:19, "I have set before you life and death, blessings and curses."); (Also see, Jeremiah 21:8, I am setting before you the way of life and the way of death."); (Deuteronomy 30:15, See, I set before you today life and prosperity, death and destruction.); (Psalm 56:13, For you have delivered me from death and my feet from stumbling, that I may walk before God in the light of life. God's Word saves us from hell); (Psalm 107:20, He sent out his word and healed them; he rescued them from the grave. God's Word via the Holy Spirit, and the Word made Flesh, Jesus Christ); (Psalm 119:105, "Your word is a lamp for my feet, a light on my path." We have a choice to seek the Word while it may be found, and the way to eternal life or to ignore or reject it, to our own doom.)

146. Sadly, I believe scripture teaches many will perish in the second death. Few find eternal life since they are misled by leaders like Defendant who lead them into temptation.

147. We are saved by the love of God and his love is showing us the way of salvation via loving God and the new command loving one another. (See, John 13:34 "A new command I give you: Love one another. As I have loved you, so you must love one another."").

148. I believe showing us the way to escape death is pretty loving of God.

149. I believe many people confuse people pleasing as love. Many confuse lusts as love, and they perish for their misunderstanding.

150. I believe the Defendant is encouraging confusion and veiling the truth that can save people from their sins through deception. (See, 2 Corinthians 3:14-18, "But their minds were made dull, for to this day the same veil remains when the old covenant is read. It has not been removed, because only in Christ is it taken away. Even to this day when Moses is read, a veil covers their hearts. But whenever anyone turns to the Lord, the veil is taken away. Now the Lord is the Spirit, and where the Spirit of the Lord is, there is freedom. And we all, who with unveiled faces contemplate the Lord's glory, are being transformed into his image with ever-increasing glory, which comes from the Lord, who is the Spirit.")

151. Hundreds of people are dying of Covid19 every day. It is better to tell people sins will kill you. It is better for people to turn away from sins, which is absence of love, and be saved from the second death, than to encourage folks to dismiss the sins that hurt others and themselves eternally, despite gaining gold, and glory here, thereby encouraging folks to remain in sin, as Defendant models by dismissing sins by ignoring his own wrong doing and the wrong doing of those who serve Defendant's interests.

eternal lives by transforming them into right doers, and healing the victims of their misdeeds, again and again, never giving up hope they may choose to behave better by love, affording them opportunities like God affords us the same so long as they remain alive. (See, Ephesians 5:11 “Have nothing to do with the fruitless deeds of darkness, but rather expose them.”); (Luke 17:3, “So watch yourselves. ‘If your brother or sister sins against you, rebuke them; and if they repent, forgive them.’”); (See, Matthew 18: 15-17, “If your brother or sister sins, go and point out their fault, just between the two of you. If they listen to you, you have won them over. But if they will not listen, take one or two others along, so that every matter may be established by the testimony of two or three witnesses. If they still refuse to listen, tell it to the church; and if they refuse to listen even to the church, treat them as you would a pagan or a tax collector.’”); (2 Timothy 4:2, “ Preach the word; be prepared in season and out of season; correct, rebuke and encourage--with great patience and careful instruction.”); (Also see, Ecclesiastes 7:5, Proverbs 27:5, 1 Timothy 5:1); (See, 1 Timothy 5:20, “But those elders who are sinning you are to reprove before everyone, so that the others may take warning.”)

155. Sometimes, people really do not understand evil is not good. Good is not evil. I believe the folks who accepted the Holy spirit who wrote or are written about in the Bible are still making a difference, beyond their lives, just as each of our lives make a difference concerning the eternity of others, even beyond our

lifetimes. (Cf., Isaiah 5:20, “Woe to those who call evil good and good evil, who put darkness for light and light for darkness, who put bitter for sweet and sweet for bitter.”).

156. I believe God, the Holy Spirit revealed to us through other people and through the Bible too.

III. CHILDREN OF THE DEVIL v. CHILDREN OF GOD, THE MARK OF THE BEAST, THE WHORE, THE DAMNED V THE MARK OF LOVE, OF GOD

157. I am a child of God. (1 John 4:7, “Dear friends, let us love one another, for love comes from God. Everyone who loves has been born of God and knows God.”); (1 John 3:9, No one who is born of God will continue to sin, because God's seed remains in them; they cannot go on sinning, because they have been born of God.”); (Galatians 4:7, “So you are no longer a slave, but God's child; and since you are his child, God has made you also an heir.”); (Wisdom 2:13-15, “He claims to have knowledge of God, and calls himself a child of the Lord. We see him as a reproof to our way of thinking, the very sight of him weighs our spirits down; for his kind of life is not like other people's, and his ways are quite different.”)

158. Not everyone is a child of God. (John 8:47, Jesus says, "Whoever belongs to God hears what God says. The reason you do not hear is that you do not belong to God.").

159. 1 John 3:10-11 Provides:

"This is how we know who the children of God are and who the children of the devil are: Anyone who does not do what is right is not God's child, nor is anyone who does not *love* their brother and sister. For this is the message you heard from the beginning: We should *love* one another." (emphasis intended).

160. God teaches me people are children of the devil. (Citing, Jesus in John 8:44, "For you are the children of your father the devil, and you love to do the evil things he does. He was a murderer from the beginning. He has always hated the truth, because there is no truth in him. When he lies, it is consistent with his character; for he is a liar and the father of lies."); (Also see, 1 John 3:8, "The one who does what is sinful is of the devil, because the devil has been sinning from the beginning. The reason the Son of God appeared was to destroy the devil's work."); (Also see, Acts 13:10, "You are a child of the devil and an enemy of everything that is right! You are full of all kinds of deceit and trickery. Will you never stop perverting the right ways of the Lord?"); (Matthew 13:38, "The field is the world, and the good seed represents the sons of the kingdom. The weeds are the sons of the evil one").

161. Scripture teaches me there are more of the desolate one, meaning those without God, than with God. (See, Isaiah 54:1, "Sing, barren woman, you who never bore a child; burst into song, shout for joy, you who were never in labor; because more are the children of the desolate woman than of her who has a husband," says the LORD."); (Galatians 4:27, "or it is written: 'Be glad, barren woman, you who never bore a child; shout for joy and cry aloud, you who were never in labor; because more are the children of the desolate woman than of her who has a husband.'")

162. I believe scripture teaches children of God will live with "children of the evil one." (Citing, Matthew Chapter 13.)

163. I am taught by God to judge, or discern children of the devil from children of God. (1 John 2:9, "If anyone claims to be in the light but hates his brother, he is still in the darkness."); (See, 1 John 2:11, "But whoever hates his brother is in the darkness and walks in the darkness. He does not know where he is going, because the darkness has blinded his eyes."); (1 John 3:15, "Everyone who hates his brother is a murderer, and you know that eternal life does not reside in a murderer.")

164. Jesus commands us to "judge correctly," I believe commanding us to know the "pigs" and "swine," meaning folks who profess Jesus but trample upon

Jesus, by pimping out Jesus's name to serve their profit. (Citing, John 7:24); (See, Matthew 7:6, "Do not give dogs what is sacred; do not throw your pearls to pigs. If you do, they may trample them under their feet, and turn and tear you to pieces.")

165. "Pigs" and "swine" behave the same as Satan did in Genesis, Chapter 3, and in Matthew, 4:1-11 and in the companion verse Luke 4:1-13, by tempting humanity to reflect the image of the devil under the guise of God, as he harms and destroys those who are misled. Id.

166. I believe Trump's fruits, words and deeds, bear "thorns and thistles" per scripture, encouraging others to do the same under the guise of good or God, creating more fuel "for the fires" of hell. (Citing, Matthew 7:16, "By their fruit you will recognize them. Do people pick grapes from thornbushes, or figs from thistles?"); (See, Ezekiel 21:32, Ezekiel 15:4, Isaiah 9:19, Isaiah 9:5, Habakkuk 2:13, Ezekiel 15:6, Jeremiah 51:58, relating to the fuel for the fires of hell to be burnt up on judgment day.)

167. I believe leaders have the power to mislead people to hell.

168. But for some leaders' words and deeds, I believe many would not go to hell.

169. But for Defendant President Trump's words and deeds, I believe many would not be misled on the way to hell.

170. I believe putting words in God's mouth or distorting the meaning, or accepting, or creating the illusion of a wrong meaning to serve a purpose other than God's will, is using God's name in vain. (See, Ezekiel 13:3, "This is what the Sovereign LORD says: 'What sorrow awaits the false prophets who are following their own imaginations and have seen nothing at all!'""); (Lamentations 2:14, "The visions of your prophets were empty and deceptive; they did not expose your guilt to ward off your captivity. The oracles they saw for you were empty and misleading."); (Jeremiah 23:16, "This is what the LORD of Hosts says: 'Do not listen to the words of the prophets who prophesy to you. They are filling you with false hopes. They speak visions from their own minds, not from the mouth of the LORD.'"); (Jeremiah 28:15, "Then the prophet Jeremiah said to the prophet Hananiah, "'Listen, Hananiah! The LORD did not send you, but you have persuaded this people to trust in a lie.'")

171. I believe it is wrong because I learned it from God's teachings about false prophets and the wolves in sheep's or shepherds' clothing that mislead the sheep to slaughter by using God's name, or the name of good, in vain. (See, Matthew 7:15-23, 1 John 4:1, Mark 13:22, Matthew 24:24, Matthew 24:11, Luke 6:26, Ezekiel 34:2).

172. To confirm, I believe people have the power to mislead other people to hell.

173. I believe Defendant is misleading people I love to hell, under the guise of heaven, and those Defendant misleads are misleading others to hell too.

174. I believe Jesus noted the power of people to mislead others to hell when Jesus scolds religious leaders for making their followers twice as worthy of hell, under the guise of Godliness. (See, Matthew 23:15, "Woe to you, teachers of the law and Pharisees, you hypocrites! You travel over land and sea to win a single convert, and when you have succeeded, you make them twice as much a child of hell as you are.").

175. Children of God, know God.

176. I know God more by seeking to understand his Word, through the father son and holy spirit, and the holy spirit revealed to us through the Bible too.

177. Children of the devil have the power to mislead others to hell.

178. I believe Trump is a child of the devil.

179. I believe people are made in the image of God by their ability to love unconditionally since we are taught God is love.

180. 1 John 4:16 provides in part "God is love."

181. I believe God is love.

182. I believe we become saved by being born of God by accepting God, the Holy Spirit, in our hearts, which is love in our hearts to help us realize our strength and power to fearlessly choose to reflect the image of God by loving God foremost and loving others as ourselves.

183. The Devil, and children of the devil, like I believe Donald Trump is, mislead the masses to hell under the guise of heaven, or self gain, by driving out God in their hearts, unconditional love in the hearts of man, replaced with lust and business greed, by barter or exchange.

184. Love is unconditional, not giving to get.

185. Business is conditional, giving to get, not unconditional love.

186. I believe toiling in the soil, business, is one of the punishments for original sin meant to teach humility, not to be glorified teaching the sin of Satan pride thereby misleading many to hell. (See Genesis 3:17-19).

187. Since I love God, and seek to love God by loving others, God and I are at a loss as Defendant misleads folks to the second death.

188. Any of Defendant's alleged religious purposes do not remove his violations of the laws in this case.

189. I believe Defendant reflects a little piece of hell on earth by his absence of love, which is the absence of God.

190. I believe Defendant models misbehavior that encourages folks to become children of the devil, instead of children of God, under the guise of God.

191. I believe the Defendant reflects the image of the devil.

192. I believe but for Defendant's illusion of Godliness, many people would not be misled to the way of hell, should they remain in confusion without repentance.

193. I believe the Defendant reflects the mark of the beast by what he thinks about as if written on his forehead, and by how he lives as if written on his hand. (See, Revelation 13:16-17, "And the second beast required all people small and great, rich and poor, free and slave, to receive a mark on their hand or on their forehead, so that no one could buy or sell unless he had the mark, the name of the beast, or the number of its name." I believe money and material gain is on their forehead by what they think about, and on their hand by how they live, not love for one another, not love for God.); (See, Revelation 14:9-11, "If anyone worships the beast and its image and receives its mark on their forehead or on their hand, they, too, will drink the wine of God's fury, which has been poured full strength into the cup of his wrath. They will be tormented with burning sulfur in the

presence of the holy angels and of the Lamb. And the smoke of their torment will rise for ever and ever. There will be no rest day or night for those who worship the beast and its image, or for anyone who receives the mark of its name.”); (See, Revelation 16:2, Revelation 13:16 and Revelation 19:20, and); (See, Revelation 20:4 Not everyone chooses the mark of the beast. The number of the beast is 666, representing the amount of gold in Solomon’s temple); (See, 1 Kings 10:14 and 2 Chronicles 9:13, “The weight of the gold that Solomon received yearly was 666 talents.” This relates to the number of the beast 666, meaning greed, gluttony and self-gain.); (See, Revelation 13:18, “This calls for wisdom. Let the person who has insight calculate the number of the beast, for it is the number of a man. That number is 666.” I believe the man is the devil. The devil is called a man in Isaiah Chapter 14.); (See Isaiah 14:16, “Those who see you stare at you, they ponder your fate: “Is this the man who shook the earth and made kingdoms tremble,””); (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.”); (1 John 4:4, “You, dear children, are from God and have overcome them, because the one who is in you is greater than the one who is in the world.”).

194. The mark of the beast is also the mark of a whore. In Jeremiah 3:3, the prophet told the people they have the forehead of a prostitute, by what they

think about, as if written on their forehead, money and material gain instead of God.

195. I believe the prophets also call people prostitutes in Scripture for exchanging their trust in God for something else like money or material things, thereby they work for material gain not spiritual riches, giving their lives, selling their lives, their works, for mere money, instead of God. (See, Matthew 6:19-21, Jesus instructed, "Do not store up for yourselves treasures on earth, where moths and vermin destroy, and where thieves break in and steal. But store up for yourselves treasures in heaven, where moths and vermin do not destroy, and where thieves do not break in and steal. For where your treasure is, there your heart will be also.").

196. I base my belief, in part, because the Holy Spirit through a prophet scolds his people for trying to be loved by the world by material gain only to hurt themselves: Ezekiel 16:32-34 provides;

"You adulterous wife (meaning unfaithful to God)! You receive strangers instead of your own husband! Men give gifts to all their prostitutes, but you gave gifts to all your lovers. You bribed them to come to you from everywhere for your illicit favors. So your prostitution is the opposite of that of other women: No one solicited your favors, and you paid a fee instead of receiving one; so you are the very opposite!"

197. I believe the mark of the beast is business greed, by barter or exchange, conditionally caring without unconditional love, living for mere rewards and benefits without sacrificial unearned love towards others.

198. Business is not the sin.

199. Business greed is the sin.

200. When people like Defendant love money more than people he uses to get money or material gain, I believe he chooses to reflect a little piece of hell on earth.

201. I believe people can participate in business and love the people they may gain funding from more than the money they receive or potentially may receive.

202. I believe Jesus when he says “You cannot serve God and money.”
(Citing, Matthew 6:24.)

203. I believe “the love of money is the root of all evil: which while some coveted after, they have erred from the faith, and pierced themselves through with many sorrows.” (Citing, 1 Timothy 6:10, King James version.)

204. Defendant glorifies money, business greed, winning for self at the cost of harming or even bankrupting others.

205. I believe Defendant glorifies business, and teachings many to mind their own business without concern for others.

206. I believe people go to hell for merely minding their own business since their minds are not on loving others unconditionally by concern, thought and deed.

207. I believe children of God are known by their love.

208. I believe children of the devil are known by their absence of love. (See, John 13:35, "By this everyone will know that you are my disciple, if you love one another.)

209. Children of God are marked on their forehead and on their hand, by the love of God in their hearts which reflects what they think about, as if written on their forehead, and on their hand by how they live. (See Ezekiel 9: 4, "and said to him, "Go throughout the city of Jerusalem and put a mark on the foreheads of those who grieve and lament over all the detestable things that are done in it." Those who grieve because of the sins of others were marked of God and not to be destroyed in hell on judgment day); (See, Exodus 13:9, Exodus 13:16, Deuteronomy 6:8, Deuteronomy 11:18, relating to God's love and guidance which teaches us we are loved and to love, and is to be remembered as if written on our foreheads and on our hand, by how we live.)

210. I believe Trump glorifies the punishments for the original sin, and the fruits of the punishment such as sex and money, loyalty, or martyrdom, teaching pride that damns people to hell instead of receiving edification via humility leading to salvation relating to “toiling in the soil,” work, child bearing, marriage and death. (See Genesis Chapter 3 regarding original sin and the punishments for original sin.)

211. I believe Trump is encouraging others to misbehave by glorifying the punishments and the fruits of the punishment of original sin as Godly or good, thereby misleading them to hell.

**IV. DEFENDANT EXACERBATES STRAINS AND TENSIONS
INSTEAD OF ALLEVIATING THEM ENCOURAGING
FOLKS TO GIVE INTO TEMPTATION TO SIN TO THEIR
DESTRUCTION IN HELL FOR ABSENCE OF LOVE
REPLACED BY FEAR UNDER THE GUISE OF GODLINESS**

212. Trump exacerbates tensions relating to sex, place of origin, disease and death, religion, race, and economic strains instead of alleviating them, thereby increasing temptations for people to sin by giving into fear, which drives out love, misleading people to hell under the illusion of Godliness.

213. Per 1 John 4:18, “Love drives out fear”. (Id. “There is no fear in love. But perfect love drives out fear, because fear has to do with punishment. The one who fears is not made perfect in love.”)

214. Accordingly, I believe fear drives out love.

215. Defendant Trump increases fear and anxieties instead of loving those he is charged to care for by alleviating legitimate concerns.

216. The Bible teaches the cowardly do not go to heaven. (See, Revelation 21:8, “But the cowardly, the unbelieving, the vile, the murderers, the sexually immoral, ..., the idolaters and all liars--they will be consigned to the fiery lake of burning sulfur. This is the second death.”)

217. Fear is sin. The bible teaches us not to be afraid, with the caveat to fear the Lord as he will damn you for harming yourself or others God loves. (See, Deuteronomy 31:6, 1 Chronicles 22:13 and 2 Chronicles 32:7, “Be strong and courageous. Do not be afraid ...”); (See, Luke 12:4-5, “I tell you, My friends, do not be afraid of those who kill the body and after that can do no more. 5But I will show you whom you should fear: Fear the One who, after you have been killed, has authority to throw you into hell. Yes, I tell you, fear Him!”); (See, Psalm 27:1); (See, 1 Samuel 12:14, and Joshua 24:1 “Fear the Lord”).

218. Defendant misleads people to fear others, causing people to blame others outside of their own, instead of loving them as I believe God commands, replacing love in their hearts with indifference, unconcern, bitterness, cowardly self defense or hate, misleading them to hell, should they not repent. (See, Ezekiel 16:49, “Now this was the sin of your sister Sodom: She and her daughters were arrogant, overfed and unconcerned; they did not help the poor and needy.” People are damned to hell for unconcern and ignorance, the decision not to care, not to love.); (See, Matthew 25:45-46, “He will reply, 'Truly I tell you, whatever you did not do for one of the least of these, you did not do for me. Then they will go away to eternal punishment, but the righteous to eternal life.’” People go to hell for choosing not to love, by *inter alias*, ignoring those in need.).

219. I believe Defendant also misleads people to hell by teaching them to exploit others, especially the needy, to serve themselves, their own families or own people’s material gain which is great sin.

A. MISTREATMENT OF WOMEN

220. Trump sins against God by conduct demeaning women by lusting after them, or objectifying them based on looks instead of the content of their heart. (See, 'You Can Do Anything': In 2005 Tape, Trump Brags About Groping, Kissing Women, By Jessica Taylor, October 7, 2016:05 PM ET,

<https://www.npr.org/2016/10/07/497087141/donald-trump-caught-on-tape-making-vulgar-remarks-about-women>); (Also see, 11 insults Trump has hurled at women, by John Walsh, Oct 17, 2018, 3:26, <https://www.businessinsider.com/trumps-worst-insults-toward-women-2018-10>); (Also see, BBC, What are the sexual allegations against Donald Trump?, dated June 25, 2019, <https://www.bbc.com/news/world-us-canada-48754967>); (Also see, The Guardian, The Trump allegations A list of the sexual misconduct accusations made against Donald Trump. He has denied the allegations, by Lucia Graves and Sam Morris, Last updated Wednesday 6 November 2019, <https://www.theguardian.com/us-news/ng-interactive/2017/nov/30/donald-trump-sexual-misconduct-allegations-full-list>).

221. Trump's lustful words and deeds mislead people I love to dismiss this sin when Jesus Christ says it is better to tear out your eye balls than to be thrown into hell for wrongfully lusting after women. (Citing Jesus Christ in Matthew 5:27-30).

222. Trump sins against God by demeaning women as things to look at, use, or do instead of people to honor and respect.

223. I believe sex is marriage before God whereby a man becomes a servant of his wife until he dies. A man who does not live to serve her, cheapens

the one he covenanted before God to protect, by relations, sex, without sacrificing his life to care for and serve hers until he dies, thereby sinning against God. (See, Malachi 2:16, "The man who hates and divorces his wife," says the LORD, the God of Israel, "does violence to the one he should protect," says the LORD Almighty. So be on your guard, and do not be unfaithful."); (Also see, Hosea 4:14, "I will not punish your daughters when they turn to prostitution, nor your daughters-in-law when they commit adultery, because the men themselves consort with harlots and sacrifice with shrine prostitutes-- a people without understanding will come to ruin!" Thus, I believe men will be condemned to hell, not the women they exploited to serve lusts, merely for becoming victims of men's misdeeds.); (Citing, Matthew 19:4-6); (Also see, Genesis 2:24, "Jesus answered, 'Have you not read that from the beginning the Creator 'made them male and female,' and said, 'For this reason a man will leave his father and mother and be united to his wife, and the two will become one flesh? So they are no longer two, but one flesh. Therefore what God has joined together, let man not separate.'"); (See, Genesis 20:2, Genesis 24:67, Genesis 12:19, Genesis 20:1-4, Cf., Genesis 12:19, I believe "took her as my wife" means having sex with a woman.)

224. Jesus teaches leaders are servants. (See, Matthew 23:11 and Luke 22:26.)

225. In Ephesians 5:23, I learn husbands are leaders to their wives.

226. Thereby I believe husbands, as leaders, are servants to their wives. Husbands feed, care for and tend to their wives. Misleaders, teach husbands to enslave wives, instead of teaching husbands to be servants. Misleaders like Defendant teach men to be servants of self.

227. I believe Servants of self are servants of Satan, and servants of sin.

228. Servants of self exploit those they profess to serve, misleading and deceiving them, under the guise of helping them, to instead help themselves instead.

229. I believe Defendant exploits women, demeaning them, to instill pride in self and in other men which thinking I believe damns people to hell.

B. MISTREATMENT OF FOREIGNERS

230. I believe Trump persecutes the foreigner by his policies at the Border, when the Bible teaches us to love foreigners as ourselves. (See Exhibit 7, please refer to the article of impeachment I drafted related to the border).

231. The Bible in Leviticus 19:34 provides, "The foreigner residing among you must be treated as your native-born. Love them as yourself, for you were foreigners in Egypt. I am the LORD your God."

232. The Bible in Exodus 22:21 commands, "You must not exploit or oppress a foreigner resident, for you yourselves were foreigners in Egypt."

233. The Bible in Deuteronomy 10:19 commands, "So you also must love the foreigner, since you yourselves were foreigners in the land of Egypt."

234. Defendant encourages the people to violate these commands by instilling unconcern, absence of love and bitterness for those who may compete for jobs and resources, instead of loving them, not exploiting them or resenting them for the love of money.

235. "“They can’t get jobs, because there are no jobs, because China has our jobs and Mexico has our jobs,’ Trump said.” (Citing, ABC News, *Donald Trump Sells Chinese Goods Despite Accusing China of Stealing US Jobs, Trump says he's "obligated" to buy Chinese goods while China has U.S. jobs.*, By SUSANNA KIM, June 17, 2015, 2:45 PM, <https://abcnews.go.com/Business/donald-trump-sells-chinese-goods-accusing-china-stealing/story?id=31826791>).

C. ADDITIONAL ECONOMIC STRAIN

236. I believe a good leaders care for those they are charged to serve and teach those they serve to be great too by serving one another, not exploiting one another to serve business greed or self gain. (See Matthew 23:11)

237. I believe good leaders alleviate economic strains, instead of ignoring or exploiting them, by at least giving those the leaders serves notice to prepare for foreseeable harm so as to reduce the harmful impact.

238. I believe Trump is increasing temptations to sin by driving out love replaced by fear, leading many people to hell by exacerbating desperate conditions instead of alleviating them, fanning the flames of disease and death, racial tensions, political tensions, economic tensions, religious tensions, and gender based tensions, under the illusion of Godliness.

239. Defendant increases desperate conditions by his failure to care for those he serves, exacerbating harm, and thereby, increasing the temptation for the people he is charged to serve, to sin, by focusing on money, misleading them to hell.

240. I believe defendant exacerbates desperate conditions to exploit the masses he is charged to serve tempting them to serve greed, trust in money, to be damned to hell.

241. Defendant teaches people to serve greed instead of teaching them to care for one another which leads people to hell. (See, Acts 8:20, "Peter answered: 'May your money perish with you, because you thought you could buy the gift of God with money!"). (People are more valuable than money. God commands us to

love people not money. In John 13:34, Jesus said “A new command I give you: Love one another. As I have loved you, so you must love one another.”)

242. Defendant increases the probability of welfare, social security, Medicare and retirement will be reduced by his policy of ignorance and exploitation by discouraging love for one another, and encouraging business greed, thereby tempting people to love money, seek to trust in and protect money, while driving out their love for others, misleading many people to hell.

243. I believe there is always a way out from sin. (See, 1 Corinthians 10:13, “No temptation has overtaken you except what is common to mankind. And God is faithful; he will not let you be tempted beyond what you can bear. But when you are tempted, he will also provide a way out so that you can endure it.”)

244. Should social security be eliminated or reduced, Defendant may choose to persuade Congress to lift the cap on the social security tax, which would increase funding so all earned wages would be taxed. Or in the alternative, Defendant may encourage congress to apply social security taxes upon higher waged earners to encourage businesses to not only pay their employees more to avoid paying more in taxes, but also to increase tax revenue to help fund social security to take care of the elderly.

245. Additionally, Congress has the power to coin money without borrowing it during the duration of the pandemic. Congress has the power to bail out all Americans \$2,000.00 a month, with back pay from the inception of the national emergency to alleviate the economic strain to take care of the people instead of exploiting them to serve business greed. It is okay if Americans boost other economies by buying international goods. I believe other people are not our enemies. They merely are people who live somewhere else, people Jesus commands us to love not exploit to serve greed.

246. Instead of alleviating desperate economic strains by implementing policies and encouraging laws that care for the people, the Defendant exacerbates economic strains to serve those who may serve him, thereby serving himself, at the expense of those he is charged to serve.

247. Defendant encourages polluting factory jobs, which I believe will become low paying, back breaking and polluting bad investments, causing not only money losses, but also loss of life, health and permanent destruction to the environment affecting the lives and health of future generations.

248. Under the guise of helping people Defendant merely seeks to exploit them under his policy of job encouragement, to serve himself through bartered favors, at the expense of those he is charged to serve.

249. I believe the United States does not have the laws to protect the environment and people required should more factories be built.

250. I believe the initial salaries for potential factory workers may be higher now, before foreseeably, losing a hundred fold of profits down the line as the global businesses open up and compete and create improvements off the backs of bad investments made to fail here at home, reducing salaries here while leaving the scars of loss of health, life and pollution, while reducing factory workers' salaries, or eliminating jobs by automation or due to loss of profit.

251. Additionally, the suppliers of raw materials such as North Korea and Russia, may tempt businessmen and businesswomen into forming factories by offering low costs for materials, as they may collude in get rich quick business schemes with American businessmen and women to make money off of failing in America too. Once the factories are built and investment and debt is incurred, the suppliers may increase the prices down the line reducing profit and thereby encouraging the temptation for the factory owners to reduce the salaries of their workers.

252. Defendant allegedly seeks to bring manufacturing or factory jobs to the United States.

253. I believe there is no foundation of success for factory jobs, just stress, distress and failure at this time.

254. I believe Defendant tempts people to sell or enslave people's souls in exchange for salaries, to serve business greed, by his jobs rhetoric, only to harm them down the line, by creating jobs where people will be exploited for profit, taken advantage of under the guise of being taken care of. (See, CNN, Trump wants to create 10 million jobs in 10 months. Here's why that might be tricky, By Anneken Tappe, CNN Business, Updated 12:24 PM ET, Fri August 28, 2020<https://www.cnn.com/2020/08/28/economy/trump-10-million-jobs/index.html>).

255. Those in charge of manufacturing companies or factories may escape personal culpability for the physical and economic harm they may foreseeably cause, including unpaid construction fees, while gaining profit, via resigning, entering the business into bankruptcies, not personal bankruptcies, and by receiving business bail outs, tax breaks or other government incentives.

256. I believe it is wrong when business people make money off of failure, while escaping personal culpability. Yet, I believe this is the foreseeable result of Defendants' economic model.

257. I believe bad business, made to fail business is made more profitable for some big businesses at this time, under the Defendant's administration.

258. The Defendant appears to have made profit despite failed bankrupted businesses, which is evidence that bad business, also known as, made to fail business is often profitable in America, by those who exploit our unjust laws.

259. The Internal revenue allows for businesses, including farmers, if requirements are met, to take deduction for losses against profits for about three years back or three years forward if they spill, kill or destroy food or products under 26 U.S. Code § 1212.

260. During this pandemic, sales for some products around the globe has foreseeably decreased as governments have partially, temporarily closed down certain sectors of the economy around the globe.

261. Thus, many big businesses likely will receive less revenue from products sold, albeit they may have artificially increased stocks by stock buy backs, creating the appearance of an economic boom or stability, while possibly maintaining high salaries or even giving bonuses to those in charge for such manipulated increase in stocks.

262. Many businesses will be foreseeably tempted to enter into Bankruptcy, insulating many salaries and bonuses given to people by businesses and entities, who work in made to fail, made to bankrupt, businesses or entities.

263. Since, profit loss for big businesses is increasingly likely during the pandemic as factories or entities partially shut down, businesses have a decreased incentive to give products or food or products away since the businesses cannot deduct charitable donations against such losses, during a year they made little to no profit under the tax code, unless the Cares act amended this.

264. Thus, many businesses, had an incentive to destroy or throw out products to take advantage of the rule deducting losses against future or past profit, instead of giving to charities.

265. In addition, businesses are more likely eligible for business bailouts or business loans if they declare losses by killing, spilling or destroying food or products by throwing them out.

266. Many Americans may remain hungry as farmers spilled milk literally, with the incentive to gain the tax write off and or eligibility for bailouts or loans.

267. By trashing products and items to gain monetary advantage, business men and ladies increase pollution in wasteful production, for throw away items while also filling up the landfills.

268. The three year forward and back business tax break is a tool to monopolize supply to maximize business profit at the cost of harming people's lives, health and the environment.

269. I believe the Defendant is increasing the risk of an artificial, intentional, manufactured stock market crash that will foreseeably occur down the line by choosing not to discourage made to fail businesses, where even state and local government employee's pensions may be at risk of reduction or loss in Chapter 9 bankruptcies, thereby tempting folks to focus on money instead of God, by exacerbations of desperate conditions, misleading many to hell.

270. I believe the tax break for charitable donations serves Satan and damns people to hell. I believe this tax rule drives out unconditional love from the hearts of men replaced with business greed by barter or exchange. (Citing Matthew 6:1-5, and 26 U.S. Code § 1212).

271. I believe Defendant's is misleading people to give to charities years down the line to take advantage of this unholy rule, the charitable tax deduction rule, thereby misleading them to hell for the praise of men or some other benefit. (26 U.S. Code § 1212).

272. I believe Defendant encourages violations of the 13th amendment, forced servitude by increasing the conditions to foreseeably reduce and, or remove

welfare, thereby increasing desperate conditions that force people to work, and encouraging organized charity which I believe damns people to hell forever, should they not repent.

273. I believe pro bono, fundraising, volunteering, organized charity, and even selling girl scout cookies is a great sin that damns people to hell, and those they mislead too, should they not repent of such evil.

274. In Matthew 6, Jesus commands do not give charitable love seen. I believe it is better not to give anything than to give charity recognized. Jesus teaches when you give charitable alms, do not know your left hand from your right hand, meaning do not give out of one hand to get out of the other. By teaching giving to get is charitable love, people wrongly learn business by barter or exchange is love, driving out the love from the hearts of man, replaced with the love of money, the mark of the beast, the mark of the damned as good, business greed. (Citing Matthew 6:1-4); (See, Romans 4:4 “Now to the one who works, wages are not credited as a gift but as an obligation.” Love is not business and can not be bought or bartered for.)

275. Like “hypocrites” many who encourage charitable donations, teach giving money is good. (Citing Matthew 6:2). So, if someone has no money to give, they wrongly learn they can not be good. Next thing you know, people are

tempted to demean the needy they beg for, calling them deadbeats, lazy, worthless and other ugly, untrue things.

276. Compromising Jesus's words for man's material gain only harms and misleads the people for temporary benefits.

277. It is not worth selling souls for a bowl of soup, or food, or to encourage charitable alms which violate Jesus's teachings, no matter how starving someone is, since it misleads people to eternal death in hell. (See, Genesis 25:29-34, This is the story of Jacob and Esau where Esau sold his birthright for a bowl of soup)

278. I believe we do not live by bread alone but feed our soul with every word of God for eternal life. (Citing, Deuteronomy 8:3, Matthew 4:4, Luke 4:4).

279. I believe those who live on bread alone, meaning money and material things or people they may seek to buy by loyalty or favors, do not have eternal life.

280. Defendant also donated his salary. (USA TODAY, Fact check: President Donald Trump donates his salary, but he still makes money, by Molly Stellino, published July 11, 2020, <https://www.usatoday.com/story/news/factcheck/2020/07/11/fact-check-donald-trump-donates-salary-but-he-still-makes-money/5410134002/>).

281. I believe the Defendant sins against God and man for donating his salary because it violates Jesus Christ's teachings not do charitable alms recognized.

282. I believe the Defendant misleads people to hell by donating his salary, under the guise of good or Godliness.

283. Defendant models misbehavior, some Americans follow under the guise of good, thereby misleading them to hell by sinful thinking. (Isaiah 9:16 "For the leaders of the people have misled them. They have led them down the path of destruction," meaning hell, the final death); (Matthew 15:14, "Disregard them! They are blind guides. If a blind man leads a blind man, both will fall into a pit." meaning hell); (Matthew 23:16 "Woe to you, blind guides! You say 'If anyone swears by the temple, it means nothing; but if anyone swears by the gold of the temple, he is bound by his oath.'"); (Micah 3:5 "This is what the Lord says: 'As for the prophets who lead my people astray, who proclaim peace while they chew with their teeth, but declare war against one who puts nothing in their mouths.'")

284. As a Christian, I love all people.

285. I believe some people are misled to hell under the guise of heaven by Defendant's leadership.

286. The Defendant has not chosen to scold Americans use of violence toward human life and health, or to discourage the use of violence against people as opposed to property, and so he encourages violence by inciting passion, so the people sin, leading to hell, instead of encouraging truth in love and guidance. ('No Blame?' ABC News finds 54 cases invoking 'Trump' in connection with violence, threats, alleged assaults. President Donald Trump insists he deserves no blame for divisions in America. By, Mike Levine, May 30, 2020, 8:20 AM, https://abcnews.go.com/Politics/blame-abc-news-finds-17-cases-invoking-trump/story?id=58912889&fbclid=IwAR0lxUvVytdnrT2EahtVznEzSudldtMU9SBee_gORxyOLua025FmPoqe_Wo); Washinton Post, The Trump administration said that militarizing the police reduces crime. Is that true?, by Ayse Eldes and Kenneth Lowande, June 1, 2020 at 5:00 a.m. EDT, <https://www.washingtonpost.com/politics/2020/02/26/trump-administration-says-that-militarizing-police-reduces-crime-is-that-true/>); (See, CBS News, "When the looting starts, the shooting starts": Trump tweet flagged by Twitter for "glorifying violence", MAY 29, 2020 / 1:16 PM / CBS/AP <https://www.cbsnews.com/news/trump-minneapolis-protesters-thugs-flagged-twitter/> The president encouraged violence by tweeting when the looting starts the shooting starts).

286. The Defendant failed to admonish neo Nazis, white nationalists or kkk members against the use of violence after people were harmed or killed by their alleged members.

287. I believe my God teaches the use of violence is wrong.

288. I believe might does not make right. Might makes wrong. (See, Wisdom 2: 10-11 regarding how children of the devil think. “Let us oppress they needy just man; let us neither spare the widow, nor revere the old man for his hair has grown white with time. But let our strength by our norm of justice; for weakness proves itself useless.”)

289. Defendant’s policies encourage the destruction of the environment to serve greed through his executive orders encouraging drilling for oil and gas in the United States territories. (See Exhibit 8 attached, please find a document I drafted and sent to federal law makers in hopes to prevent the destruction of our environment triggered by Defendant’s related executive orders, which would in turn cause desperate conditions, tempting folks to sin.)

290. According to worldometer, coal, gas and oil will run out in a calculated number of years. (See, <https://www.worldometers.info/>).

291. Accordingly, investing in energy that will run out is not a wise monetary investment, nor does it serve the lives and health of the American people or our environment.

292. I believe Defendant's dirty energy policies serve Satan by "kill(ing), steal(ing) and destroy(ing)" lives to serve Defendant's self-gain by barter or exchange, even gaining personal loyalty by those who profit by such dirty energy dealings. (Citing, John 10:10, "The thief comes only to steal and kill and destroy; I have come that they may have life, and have it to the full.")

V. SPECIFIC EXAMPLES WHERE DEFENDANT CREATES THE ILLUSSION OF SUPPORTING CHRISTIANITY, THEREBY SUPPRESSING OTHER DIFFERENT BELIEFS, INCLUDING MY BELIEFS IN CHRISTIANITY THEREBY MISLEADING PEOPLE I LOVE TO HELL, DESTROYING SEPARATION OF CHURCH AND STATE, MAKING US ALL LESS FREE

A. APPOINTMENT OF PERSONAL SPIRITUAL ADVISOR, AND ALLEGED CHRISTIAN LEADERS ADVIZING THE DEFENDANT CREATING THE APPEARANCE OF SUPPORT OF CHRISTIANITY

293. Plaintiff, Meghan Kelly, repeats and incorporates by reference all of the above paragraphs and all of the below paragraphs, and the Exhibits and citations, the paragraphs refer to herein as admissible under nonhearsay and hearsay exceptions, including but not necessarily limited to, probative fact, state of mind, belief, present sense impression, periodical exception, excited utterance, admission by party opponent, as though set forth herein in the first instance.

294. Defendant Trump is misleading people I love to hell by appearing to buy church support, or apparent backing by God or apparent support of God, by bartering favors by allowing influence in his cabinet by certain Christian leaders, and by signing an executive order allegedly making it easier for churches and other religious groups to engage in politics without endangering their tax-exempt status. (See, Trump eases ban on political activity by churches, By Jordan Fabian and Naomi and Jagoda, 05/04/17 11:58 AM EDT, <https://thehill.com/homenews/administration/331902-trump-eases-ban-on-political-activity-by-churches#:~:text=President%20Trump%20signed%20an%20executive%20order%20Thursday%20making,organizations%20during%20a%20National%20Day%20of%20Prayer%20event.>)

295. “Florida televangelist Paula White, who has served as a spiritual adviser to President Trump, (joined) his administration in an official capacity,

according to a senior administration official and another person familiar with the move.” (Citing, Washington Post, Paula White, Trump’s key spiritual adviser, will join the White House, By Sarah Pulliam Bailey November 1, 2019 at 1:35 p.m. EDT, <https://www.washingtonpost.com/religion/2019/11/01/paula-white-trumps-key-spiritual-adviser-reportedly-will-join-white-house/>).

296. Paula White, heads the “White House's Faith and Opportunity Initiative, a successor to previous administrations' faith-based office that coordinates outreach to religious communities.” (Citing, Religious News Service, Paula White to head Trump’s faith office, by Jack Jenkins and Adelle M. Banks, November 1, 2019, https://religionnews.com/2019/11/01/paula-white-to-head-trumps-faith-office/?utm_source=RNS+Updates&utm_campaign=98de8ad604-EMAIL_CAMPAIGN_2019_01_09_06_29_COPY_02&utm_medium=email&utm_term=0_c5356cb657-98de8ad604-116936653).

297. The following Christian leaders, in their capacity as spiritual advisors, allegedly are members, or were members of the Defendant’s advisory board, according to the National Catholic Reporter; Gary Bauer, Mark Burns, Tim Clinton, James Dobson, Jordan Easley, Jerry Falwell Jr., Ronnie Floyd, Jack Graham, Rodney Howard-Browne, Harry Jackson, Robert Jeffress, Richard Land, Greg Laurie, Eric Metaxas, Johnnie Moore, Frank Page, Tony Perkins, Ralph Reed, Tony Suarez, and Paula White. (Citing, National Catholic Reporter, The key

evangelical players on Trump's advisory board, Sep 5, 2017, by Adelle M. Banks, Religion News Service, <https://www.ncronline.org/news/politics/key-evangelical-players-trumps-advisory-board>).

298. The inclusion of powerful Christian leaders on the Defendant's advisory board creates the inherent illusion of government backing of one religious group who hold certain religious beliefs or the actual backing of one religion, while suppressing others, making Americans less free to worship or not under the threat of government persecution by inherent suppression by the de facto display of government support of one belief or religious group over others.

B. HOLDING UP A BIBLE IN FRONT OF A CHURCH

299. In early June, the Defendant held up a bible as he posed for a photo outside the damaged St. John's Episcopal Church located at Lafayette Square, on the same day government agents tear gassed protestors.

300. This act of holding up a religious symbol, the Word of God misleads many folks I love to believe supporting Trump's misbehavior, also known as sins, such as the use of violence, such as government violent persecution by gassing protestors while exercising their freedom of association and speech, supports God.

301. This act of holding up the bible misleads people I love to believe the Defendant is receiving the backing of God.

302. Trump violated the establishment clause by creating the appearance of supporting a religion, thereby chilling the views of those with diverse views, while encouraging a false belief in Jesus's teachings, and turning others who do not believe in Jesus away from Christianity.

303. The act of holding up the bible misleads people I love to believe Trump's sinful behavior is okay or even cleansed by God when it is not, without repentance.

304. This act misleads people I love to believe sin is ok, when sin leads to the second death, loss of eternal life without repentance. (Luke 13:3, "But unless you repent, you too will all perish," meaning in hell, the second final death); (Luke 13:5, "I tell you, Nay: but, except ye repent, ye shall all likewise perish.")

305. I love all people including my enemies, and those I do not know. So, even if one person is misled by remaining under the deception of Defendant's use of religion for his own vanity, use of the Bible, the Word of God, religion, for his own purpose in place of God under the guise of serving God, I face harm at losing the opportunity to feel a fuller type of love with them on judgment day.

306. Trump appeared to support the religion Christianity by holding up the bible, and other activity discussed herein, creating the communication of state sponsored religion.

307. The Defendant told Fox News, “I think it was a beautiful picture, ... And I’ll tell you, I think Christians think it was a beautiful picture.” (Citing, Fox News, Trump responds to Milley apology for Lafayette Square photo op, By Brooke Singman, published June 12, 2020, <https://www.foxnews.com/politics/trump-responds-to-milley-apology-for-lafayette-square-photo-op>)

308. This activity purports to give Defendant's backing to Christianity, and evidences his desire to be backed by Christians based on their religious beliefs.

309. This activity purports to give God's backing to Trump for using the Word of God, the Bible, to be used for Trump's governing purpose, also known as Trump's vanity under the guise or illusion of a religious purpose.

310. Trump misleads people I love to believe serving sin is serving God, by holding up the Bible.

311. Trump misleads people I love into believing serving greed is serving God when Jesus teaches "You cannot serve God and money." (Citing, Matthew 6:24).

312. I believe those who glorify money gained by barter or exchange, business greed as their heart's desire in place of God's will, will be damned to hell should they not repent. (See, Matthew 7:21, “Not everyone who says to me, 'Lord,

Lord,' will enter the kingdom of heaven, but only the one who does the will of my Father who is in heaven.”); (See, John 14:23, “Jesus replied, ‘Anyone who loves me will obey my teaching. My Father will love them, and we will come to them and make our home with them.’”); (Also see, John 8:51, “‘Truly, truly, I tell you, if anyone keeps My word, he will never see death,’” meaning the second death, absence of eternal life).

313. Trump misleads people I love into believing serving their own will, in place of God's will is Godly by Trump's modeling of misbehavior, lovelessly living for self like Satan does, as shown in Isaiah 14:13-14, placing self first like Satan, instead of laying down their lives for God by their love for God foremost, and subordinately, loving others as themselves, including their enemies. (Mark 12:30-31 “‘Love the Lord your God with all your heart and with your soul and with all your mind and with all your strength...Love your neighbor as yourself’”); (See Luke 10:29-37. Neighbor includes those who cannot ever pay you back for the material or monetary sacrificial benefit conferred by praise, barter or monetary exchange.); (Citing, Matthew 7:11, Luke 11:13, Merely conditionally caring for your own is not unconditional love. "Even (those) who are evil give good things to their children."); (See, Matthew 16:24, Luke 9:23, Mark 8:34 regarding, laying down our lives by picking up cross for Jesus by denying self, placing God first not our own desires first.) (1 Corinthians 13:4-8, “Love is not self seeking”).

314. Trump misleads people I love to hell by teaching the punishments for original sin is the reason to live. I believe the punishments are meant to teach humility leading to salvation instead of pride leading to damnation. The punishments are meant for edification by loving guidance even when we are corrected. The punishments and the pursuit of the fruits of the punishments is not the purpose of our lives.

315. Those who glorify the punishments work, marriage and child rearing and the fruits of such money, sex, exploiting or using spouses and children to serve business greed as the reason to live to reflect evil, absence of love, absence of God, conditionally caring with no unconditional love, the sins of pride, greed, lust and evil self seeking ambition, instead of receiving humility leading to salvation, reflect a little piece of hell on earth. Pride is sin. (See, Leviticus 26:19, Obadiah 1:3, Psalm 59:12, Psalm 73:6, Isaiah 9:9, Jeremiah 13:17, Proverbs 29:23, Zephaniah 2:10, Proverbs 8:13, Proverbs 16:18, Proverbs 11:2, Jeremiah 48:29, Isaiah 16:6. Glorifying and trusting in works, in business and in people in place of God is great sin.); (See, Proverbs 11:28, "He who trust in his riches will fall (meaning into the pits of hell), but the righteous will thrive like foliage.); (See, Psalm 62:10, "Look at the man who did not make God his refuge, but trusted in the abundance of his wealth, who strengthened himself brining destruction."); (See, Micah 7:5, "Do not trust a neighbor; put no confidence in a friend. Even with the

woman who lies in your embrace guard the words of your lips."); (See, Jeremiah 9:4 "Beware of your friends; do not trust anyone in your clan. For every one is a deceiver, and every friend a slanderer.")

316. I place my trust in God. (Psalm 118:9 "It is better to take refuge in the LORD than to trust in princes."); (Psalm 91:2 "I will say of the LORD, "He is my refuge and my fortress, my God in whom I trust.")

317. I believe the purpose to live is more glorious than the punishment or the fruits of the punishments for original sin.

318. I believe the purpose of life is to love because we were created because God loves us, and to gain eternal life by such love, to love God foremost, to love self, and love others as self thereby reflecting the image of God because "God is love." (Citing, 1 John 4:16, 1 John 4:8).

319. The purpose of life is not to reflect the image of Satan by living for self, seeking to be loved when we are already loved by God. (1 John 4:19, "We love because he first loved us.")

C. DEFENDANT HYPOCRITICALLY CLAIMS "BIDEN WILL HURT THE BIBLE" AFTER DEFENDANT HELD THE BIBLE UP FOR HIS OWN VANITY EARLIER THIS SUMMER

320. “President Trump ... claimed presumptive Democratic presidential nominee Joe Biden, a practicing Catholic, is ‘against God’ as he levied a stream of attacks on his likely opponent in the November election.” Trump said, standing behind a podium with the presidential seal. ‘Hurt the Bible. Hurt God. He’s against God...’” (Citing, The Hill, Trump claims Biden is 'against God' and will 'hurt the Bible' By Brett Samuels, 08/06/20 02:45 PM EDT, <https://thehill.com/homenews/administration/510900-trump-claims-biden-is-against-god>).

321. Defendant wrongfully presumes to be the authority on God while acting with government power, wrongfully persecuting his political opponent’s religious identity, and indirectly persecuting his opponent’s supporters under the inherent, actual threat of government persecution by ridicule or otherwise.

D. TRUMP PERSECUTES PEOPLE WHO EXERCISED THEIR FREEDOM NOT TO WORSHIP, BY DEMEANING THOSE WHO OMITTED THE WORD GOD IN THE PLEDGE OF THE ALLEGIANCE

322. “Trump took to Twitter to accuse Democrats of not uttering the word ‘God’ in the pledge at (the) Democratic National Convention.” (Citing, The Hill, Trump targets Democrats over Pledge of Allegiance, By Tal Axelrod, 08/22/20 11:53 AM EDT <https://thehill.com/homenews/administration/513218-trump-targets-democrats-over-pledge-of-allegiance>).

323. Trump tweeted “‘The Democrats took the word GOD out of the Pledge of Allegiance at the Democrat National Convention. At first I thought they

made a mistake, but it wasn't. It was done on purpose. Remember Evangelical Christians, and ALL, this is where they are coming from-it's done. Vote Nov 3!"

Id.

324. Trump Suppressed the free exercise of religion by condemning the omission of the word God in the pledge of the allegiance, thereby creating a chilling effect of persecuting those who believe differently than the government sponsored belief espoused by the Government agent Defendant President Trump.

325. Defendant violated the freedoms of those he serves by persecuting people who worship or not according to the dictates of their conscience, not the dictates of the Defendant by omitting the Word God in the pledge of the allegiance.

326. Defendant may not lawlessly persecute folks for exercising the freedoms Defendant swore an oath to protect. (See *Lee v. Weisman*, 505 U.S. 577 (1992), "It is beyond dispute that, at minimum, Constitution guarantees that government may not coerce anyone to support or participate in religion or its exercise, or otherwise act in way which establishes state religion or religious faith or tends to do so. U.S.C.A. Const.Amends. 1, 14.")

327. Defendant is not a Godhead.

328. Defendant is a mere man.

**E. DEFENDANT IMPROPERLY SHARED HIS ALLEDGED
PERSONAL TALK WITH HIS DEITY**

329. In August, 2020, Defendant Trump improperly shared an alleged talk with his personal deity to a large group of Americans at a rally, while acting under the cloak of government authority as President of the United States. (Citing, HuffPost, Trump Claims COVID-19 Is God Testing Him After He Built ‘Greatest Economy In History’ The president described boasting to God about his economic successes before the coronavirus pandemic., By Carol Kuruvilla, , 08/17/2020 08:19 pm ET Updated Aug 20, 2020, https://www.huffpost.com/entry/trump-coronavirus-god-testing-him-building-economy_n_5f3af4f3c5b670ab17aec416?guccounter=1&guce_referrer=aHR0cHM6Ly93d3cuYmluZy5jb20v&guce_referrer_sig=AQAAAK_pSPCqwjcLq5y_w0V2uiT1mdFxf_h7AMxQDmAMkHuiYBYGtqCpk_JeegXMdUbqyCbSuFixlTI_h0hGHFFMWNzEDXhCtW7yrSRl9O6qsnA_gX9kpvYMQWvyf3er93TgeTKYe52GkwHXK8XJh1rrlwWMAxMVwVxTNUYbzdP98TeG)

330. Trump told supporters “‘You know what that is? That’s God testing me,’ ... “He said, ‘You know, you did it once.’ And I said, ‘Did I do a great job, God? I’m the only one that could do it.’ (God) said, 'That you shouldn't say, now we're going to have you do it again.'” Id.

331. “Trump said, ‘We built the greatest economy in the history of the world, and now I have to do it again,’” Id.

332. Defendant improperly shared his personal alleged discussion with his deity, with his supporters, thereby creating the illusion Defendant is supported by God or has a relationship with the Christian God, thereby supporting his alleged religious belief while suppressing others.

333. Defendant also violated Jesus’s teachings concerning prayer.

334. Jesus taught us we should pray in secret, not to be seen like the hypocrites who have their earthly reward. Our father who hears in secret will reward us openly, I believe on judgment day. (Citing, Matthew 6:5-8.)

335. Jesus even modeled how we should pray by going to lonely places to pray, not to gain the praise of man but of God as he leads us concerning his will. (See, Luke 5:16, “But Jesus often withdrew to lonely places and prayed.”); (Matthew 14:23, “After He had sent them away, He went up on the mountain by Himself to pray. When evening came, He was there alone”); (Mark 1:35, “Early in the morning, while it was still dark, Jesus got up and slipped out to a solitary place to pray.”); (Luke 3:21, “When all the people were being baptized, Jesus was baptized too. And as He was praying, heaven was opened.”); (Luke 6:12, “In those

days, Jesus went out to the mountain to pray, and He spent the night in prayer to God.”).

F. DEFENDANT CREATED THE ILLUSSION THERE IS A WAR ON CHRISTMAS

336. Trump created an illusion that there was a war on Christmas.

337. The President asked,

“Do you remember they were trying to take ‘Christmas’ out of Christmas? ... President Donald Trump saved America’s right to speak the words ‘Merry Christmas.’ That’s what Trump told the conservative student group, Turning Point USA, during a speech on Sunday in Florida. Trump explained that during his 2016 candidacy he promised to fix the issue of ‘they’ attempting to take the word ‘Christmas’ out of Christmas. Do you remember they were trying to take ‘Christmas’ out of Christmas? Do you remember? They didn’t want to let you say ‘Merry Christmas,’ the president said. Trump then said that because he stated, during the campaign, ‘They are going to say Merry Christmas again.’ And now, he said, ‘They are.’ The president continued, ‘That’s the least of it, too. Because we got a lot of things that they’re doing that they weren’t doing.’” (Citing, The Rolling Stone, Trump: People Are Saying ‘Merry Christmas Again’ Thanks to Him, By Peter Wade, DECEMBER 23, 2019 4:42PM ET, <https://www.rollingstone.com/politics/politics-news/people-are-saying-merry-christmas-again-thanks-to-trump-930898/>).

338. Not all people are Christians.

339. It is wrong to force the Defendant’s claimed religious belief upon others.

340. The Defendant is not God.

341. I believe God gives us free will, the choice to accept God's love, salvation and eternal life or to reject God's love by choosing the way to the final death.

342. Trump created the illusion that private citizens were not free to say Merry Christmas.

343. Private citizens are free to say Merry Christmas or not according to the dictates of their own conscience, not the required demands of the government or supporters of the government agent, the Defendant.

344. Government leaders, including Defendant, have more limited rights to support religion and holidays in order not to chill the religious freedoms of those Defendant serves because of the inherent threat by the cloak of government authority.

345. By creating the lie that private citizens could no longer say Merry Christmas, Defendant was supporting one religion and suppressing other Americans' freedom to worship or not according to the dictates of their own conscience not the dictates of the Defendant while acting under the cloak of government authority.

346. There was no war on Christmas.

347. Trump manufactured the alleged war on Christmas to use my religion, Christianity, for his own vanity, for his own political purpose to garner support, sinning against God and man while violating the establishment clause of the Constitution.

G. DEFENDANT CREATING THE ILLUSSION, HE MAY BE THE CHOSEN ONE BY GOD

348. In June 2020, "CBN News political analyst David Brody asked Trump about the claim that God put him "in office for such a time as this.'" Citing, Fox News, 'I hope it's true': Trump responds to claim he was chosen by God, By Caleb Parke, June 25, <https://www.foxnews.com/politics/trump-god-appointed-christian-interview>).

349. Trump responded, "I almost don't even want to think about it," Trump said. "Because you know what, all I'm gonna do is, I hope it's true. All I'm going to do is, I'm going to do my best.'" Id.

350. According to an article on Fox News, University professors say more churchgoers believe Trump is 'anointed by God', By Caleb Parke, May 13, 2020,

"In a 'Religion in Public' blog post ... titled 'Trump The Anointed?' Ryan Burge, assistant professor of political science and graduate coordinator at Eastern Illinois University, and Paul Djupe, an associate professor of political science at Denison University in Ohio, called it a 'phenomenon that is sweeping American religion.' "We were quite surprised by the result that

49 percent of those frequently attending worship services believed that Trump was anointed by God to be president," Bruge and Djupe told Fox News in an email. 'At least until we examined the evidence that suggested religious and secular elites continue to claim that Trump has a religiously significant role to play.' They added, 'Mainly limited to Republicans, we find dramatic increases in belief in Trump's anointment when their faith is linked to politics. As threats become larger, both real and imagined, the religious significance of the presidency appears to be growing among a wide portion of the population.' Djupe, an affiliated scholar with Public Religion Research Institute, tweeted about the results compared to a similar survey of white Protestants last year. 'There's a big increase in believing Trump is anointed.'" (Citing, Fox News, University professors say more churchgoers believe Trump is 'anointed by God', By Caleb Parke, May 13, 2020, <https://www.foxnews.com/us/trump-2020-university-church-god>).

351. On Aug. 21, 2019, Defendant tweeted,

"Thank you to Wayne Allyn Root for the very nice words. "President Trump is the greatest President for Jews and for Israel in the history of the world, not just America, he is the best President for Israel in the history of the world...and the Jewish people in Israel love him..." (CBS NEWS, *Trump tweets quote calling him the "second coming of God" to Jews in Israel*, By Sophie Lewis, AUGUST 21, 2019 / 3:47 PM / CBS NEWS, <https://www.cbsnews.com/news/trump-tweets-quote-calling-him-the-second-coming-of-god-to-jews-in-israel/>).

352. On Aug, 21, 2019, Defendant continued to tweet,

"...like he's the King of Israel. They love him like he is the second coming of God...But American Jews don't know him or like him. They don't even know what they're doing or saying anymore. It makes no sense! But that's OK, if he keeps doing what he's doing, he's good for..." Id.

353. "The latest tweets come a day after President Trump criticized 'any Jewish people that vote for a Democrat,' saying it 'shows either a total lack of knowledge or great disloyalty.'" Id.

**H. DEFENDANT MOVED THE US EMBASSY IN ISRAEL TO
JERUSALEM FOR A RELIGIOUS GROUP, EVANGELICALS**

354. Trump says he Moved the US Embassy to Jerusalem for the Evangelicals. Specifically, at a Trump rally in Oshkosh, Wisconsin Trump stated "We moved the capital of Israel to Jerusalem...That's for the evangelicas."

(See, The Hill, Trump: 'We moved the capital of Israel to Jerusalem. That's for the evangelicals'

Aris Folley 8/18/2020, <https://www.msn.com/en-us/news/politics/trump-we-moved-the-capital-of-israel-to-jerusalem-that-s-for-the-evangelicals/ar-BB185cwp>).

355. Defendant appeared to base his political decision to support religion, or to gain the support of religious supporters, thereby impermissibly excessively entangling politics and religion in violation of the 1st and 5th Amendments. (See, County of Allegheny v. American Civil Liberties Union Greater..., 492 U.S. 573 (1989); Abrogated by Town of Greece, N.Y. v. Galloway, U.S., (May 5, 2014), the "Constitution mandates that government remain secular, rather than affiliating itself with religious beliefs or institutions, precisely in order to avoid discriminating among citizens on basis of their religious faith.")

IV. GOVERNMENT SPONSORED PRIVATE PERSECUTION, BUYING LOYALTY BY BARTER OR EXCHANGE, CHURCH DONATIONS FOR A LITTLE SOMETHING DOWN THE LINE SUCH AS BAILOUTS, OR POWER TO PERSUDE POLITICIANS, AT THE COST OF TEACHING SOME PREACHERS TO PERSECUTE LIBERALS LIKE ME, SINCE I DO NOT SUPPORT THOSE WHO SUPPORT THEIR POCKETS OR POLITICAL POWER

356. On or about, May 4, 2017, President Trump signed into law Ex. Or. No. 13798, 82 Fed. Reg. 21675. (See, Exhibit 9).

357. The President's Executive order allows churches to donate to political campaigns who align their interest with the President's interest.

358. I have noticed some preachers teach opposition towards liberals like me, causing economic, social and political persecution based on I believe government sponsored support.

359. I have listened to preachers condemn or put down "liberals" when God loves all people, even liberal democrats like me.

360. People have accused me of not being a Christian when I told them I am a democrat. They have also said "you can not be a democrat and a Christian too."

361. I am a Christian.

362. I am a Democrat too.

363. I believe strangers learned wrong because Defendant and those he exploits by supporting state sponsored private persecution teach them wrong, misleading them.

364. I believe the unholy union of church and state the Defendant magnifies is purposely made to increase government sponsored private religious persecution towards me and others who do not support Defendant's interest, to serve Defendant's political gain.

365. Regardless of intent, the result of the unholy union of church and state the Defendant creates is in fact generating government sponsored private religious persecution towards me and others.

366. Trump misleads religious people in churches who desire power, worldly influence and money or favors traded more than the true treasure God in the heart's of man.

367. Trump's executive order tempts church leaders to go on the path to hell by seeking to gain the world, by bought or bartered for political influence and power, only to lose their soul. (See, Mark 8:36 "What good is it for someone to gain the whole world, yet forfeit their soul?")

368. Trump’s executive order allows religious institutions to buy or barter loyalty with those who align with Defendant’s interests, in exchange for something down the line such as bailouts, or power to persuade politicians, at the cost of teaching some preachers and Christians to persecute liberals like me, since I do not support those who serve their pockets or political power. (See, CBS News, *More than 12,000 Catholic churches in the U.S. applied for PPP loans – and 9,000 got them*, By Christina Capatides, MAY 8, 2020 / 12:17 PM, <https://www.cbsnews.com/news/catholic-churches-paycheck-protection-program-12000-applied-9000-got/>); (Also see, the Hill, *Thousands of Catholic churches received PPP loans: report*, By Lauren Vella - 05/08/20 11:14 AM, <https://thehill.com/homenews/news/496781-thousands-of-us-catholic-churches-received-ppp-loans-amid-coronavirus-report>).

369. Trump’s executive order has had the effect of substantially burdening my religious exercise, and substantially burdens the religious freedoms of others who believe or think differently.

370. Defendant cannot demonstrate “the application of the burden to me; “(1) is in furtherance of a compelling governmental interest; and (2) is the least restrictive means of furthering that compelling governmental interest.” (Citing, 42 USCS § 2000bb-1 (b)(1)(2)).

371. Serving the Defendant's own power or profit under the guise of protecting the religious entities' speech is an illusion to cover up corruption that I believe kills the participants in the second death, hell, should they not repent of such inequity.

**V. SUBSTANTIALLY BURDENING PLAINTIFF'S FREE
EXERCISE OF RELIGIOUS BELIEF VIA CHILLING HER
SPEECH BY CREATING THE ILLUSION PLAINTIFF DOES NOT
KNOW GOD BECAUSE SHE DOES NOT SUPPORT THE
DEFENDANT**

372. Many Americans appear to remain under the unholy deception that political loyalty to Defendant, is loyalty to God, and any dissident to Defendant's policies or misbehavior, by me, or those like me, is an attack to their God.

373. As a result, I personally received persecution sponsored by the Defendant's illusion that Defendant is not only a political governing authority, but also a Godhead too.

374. I do believe in Jesus Christ and I am a Christian, despite the fact others deem me not because I do not support the President's lawless misbehavior.

375. My freedom of religion to share the way to eternal life is substantially burdened by Defendant's government sponsored illusion of government combined with God or religious authority to reign ("illusion").

376. I believe these attacks against my faith and against my political affiliation based on faith are caused by the Defendant's illusion.

377. I recall more than one stranger accusing me of not being a Christian as soon as I criticized the Defendant, chilling my religious belief in sharing God's truth, and thereby, substantially burdening my religious exercise, by preventing me from fully obeying God by spreading the gospel, which includes teaching God's message, about justice, mercy, and love for humanity not exploitation and harm towards humanity to serve greed, even when I do not cite Jesus, God or religion.

378. I recall someone saying they heard I eat babies, in response to my opposition supported with biblical references towards Defendant's policies.

379. This was painful given the historical context. During the rise of Christianity, people feared Christians. I believe they were taught to fear them by those with money, connections or authority, who exploited the people for money, since Christianity teaches love for humanity and against the oppression, exploitation and indifference towards harming other people to serve greed.

380. During the rise of Christianity, people shared false rumors that Christians were baby eaters by twisting the symbolic sharing of bread and wine, “do(ing) this in memory of (Jesus),” which is called communion. (Citing, Luke 22:19, 1 Corinthians 11:24, 1 Corinthians 11:25, relating to “do this in memory of me.”)

381. I believe Jesus uses communion to teach us, “we do not live by bread alone, but by every word of God.” (Citing, Deuteronomy 8:3, Matthew 4:4, Luke 4:4, “We do not live by bread alone but by every word of God.”)

382. I believe Jesus Christ's words nourish our mind, heart and soul, giving eternal life. “We do not live by bread alone, but by every word of God.” Id.

383. I believe the word of God gives eternal life by teaching us we are loved and to love.

384. I believe the way of love as God teaches, not as the evil world teaches, replacing love with selfish lusts. (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.”)

385. I believe God teaches the way to escape the final death.

386. I remember exiting the conversation after someone called me a baby eater, while I think I may have noted I am a vegetarian, thereby chilling my

political and religious discussions with a group, substantially burdening my free exercise of religion.

387. I also remember posting bible quotes to show my disapproval of Defendant President Trump's decisions on federal legislators facebook comments.

388. I remember someone responded "I don't know God" in the comments.

389. Instead of continuing in legal debate concerning just laws and just policies, which I believe is what God teaches may be used to save souls from hell while preventing and healing harm done here, I discontinued from participating in the discussion, thereby substantially burdening my religious practice of living the Word of God too by preventing harm and damnation in hell. (See, 2 Corinthians 3:2-3, "You yourselves are our letter, written on our hearts, known and read by everyone. You show that you are a letter from Christ, the result of our ministry, written not with ink but with the Spirit of the living God, not on tablets of stone but on tablets of human hearts.")

390. I believe God clearly teaches the difference between unjust decrees that lead people to harm and hell and just laws that prevent harm in this life and the next.

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391. Unjust decrees teach love of money, encouraging people to harm one another to serve greed, while rewarding the one who gained the unjust gains.

392. Just laws, teach love or concern for humanity. Just laws correct people when they harm, oppress or exploit people to serve business greed.

393. I believe just laws have the power to not only save lives, but eternal lives.

394. Just laws heal victims of inequity while reducing the temptation for potential wrongdoers to sin by loving money, thereby saving people from hell, since Jesus says you cannot serve God and money.

395. Just laws instill hope, never giving up on the parties the Court corrects.

396. Just laws transform wrong doers into right doers.

397. I see some of our Constitutional limits on government as just limits, just laws, including the freedom to worship or not according to the dictates of our conscience, not the dictates of the Government through the Government agent the Defendant acting under the cloak of government authority as President of the United States.

398. Strangers have told me I cannot be a Christian because I am a democrat to my face too, chilling my religious belief in sharing God's truth, substantially burdening my religion by preventing me from fully obeying God by "spreading the gospel." (See, Mark 13:10, Luke 9:2, 2 Corinthians 8:18, Philippians 1:12, 1 Corinthians 9:16-18, Romans 1:1, Philippians 4:15, Galatians 2:2, Ephesians 6:15.)

399. I remember being hurt because I love God, and part of my faith is obeying Jesus by loving others by teaching them the way to escape hell, by teaching them to love others as themselves.

400. If people think I do not believe Jesus, they won't accept God's guidance through me by my pointing to the word, including the lessons and reasons behind God's words.

401. I believe I am commanded by God to spread the word. Yet, my religious exercise has been substantially burdened under the illusion Defendant created that liberals or democrats like me do not support Jesus. I am so sad.

402. I also recall people making jokes that are not funny. My faith is not a joke. I believe Jesus Christ.

403. I remember people telling me I was not a real Christian since I am Catholic too.

404. I am a real Christian.

405. Such comments towards me based on my religious and personal beliefs concerning Defendant has certainly chilled my free exercise of religion in the open.

406. I recall, Will Chandler, who I lovingly call the former king of corporate law's son, the former Chancellor's son, and a friend at the gym, citing "Romans" concerning obeying authority when I criticized Defendant's alleged lawless policies, thereby indicating I was misbehaving by not following God by not supporting Defendant.

407. I think my friend, Will Chandler, was citing to Romans Chapter 13 relating to obeying government authority. My friend did not grasp that not all laws are weighted the same in the bible.

408. Just like the Constitution preempts treaties, executive orders and federal laws which conflict, God's commandments also are preempted by the two greatest commands, Love God foremost and love one another subordinately.

409. Also note, Jesus told Pilate that the ones handing you over are guilty of a greater sin, meaning those who handed Jesus Christ over to the Court for prosecution broke a more important law, than Pilate, the judge. (Citing, John 19:11.)

410. My friend also did not grasp that just because God allows evil, it doesn't mean God willed evil.

411. We all have power to choose to be driven by our evil, loveless, selfish, desires to live for our own, or to choose to lay down our lives by loving God by exercising self control, by considering the impact of our decisions or lack thereof, upon others, even those outside of our own.

412. Just because people, like the devil in Job, have the power to do evil and so do evil, does not mean it is God's will that evil is done.

413. God affords us the power to choose, by using our brain, our mind for good by love, or evil by absence of love. Please note, I believe people go to hell for confusing lusts for love. Not knowing is not okay but is guilt to God for not caring to use your brain, to think, to care, to love.

414. That is why I think Jesus tells us to pray that God's will be done. I know I need guidance by God to understand God's will and humbly praying that we may do his will is nice. (Citing Matthew 10:6, "your kingdom come, your will be done, on earth as it is in heaven.")

415. I also recall my friend Will Chandler indicating sin was all women's fault, a different time at the gym. He said it was all Eve's fault.

416. Will's statement conflicted with scripture and was sadly supported by Defendant's demeaning words and treatment towards women under the cloak of government authority combined in the unlawful union with the cloak of religion, making him a misbehaving perceived Godhead, misguiding people I love to harm and hell.

417. Romans 5:12 provides, "sin entered the world through one man, and death through sin, and in this way death came to all people, because all sinned."

418. Scripture did not blame Eve, per my friend's statement and jokes that were not funny because I know he believes it, and teaches others to believe the same.

419. I believe people go to hell for thinking evil thoughts. (Matthew 5:22, Jesus said, "anyone who is angry with a brother or sister will be subject to judgment.")

420. I believe Defendant is misleading my friend, Will Chandler and his beautiful wife, Leah Chandler to hell, by teaching ugly thinking is Godly, and by failing to correct sinful thinking, by instead encouraging it under the cloak of Godliness and Government authority.

421. My beautiful friend, Leah Chandler, who I lovingly called the lovely law librarian is now Judge Leah Chandler of the J.P. Court, Will Chandler's wife.

422. She is not allowed to talk about religion or politics now since she became a judge.

423. But in private, before she became a judge, she indicated her difficulty in believing in a God who could sacrifice his child or encourage the sacrifice of Abraham's child, Isaac.

424. I also believe her husband's misguided beliefs on Christianity due to Defendant's encouragement and mis-leadership turns her away from salvation through God's love, since Will Chandler does not honor his wife or women by blaming Eve and women for sin.

425. Defendant does not lay down his will, his desires, to do the will of God by his love for others as himself.

426. I believe Defendant models behavior that misleads others to hell as our nation's leader, and as a perceived divine leader.

427. Leah Chandler and Will Chandler also declared their support for the Defendant, at least up until the last time I spoke with them.

428. I believe the Defendant misbehaves and misguides people I love to hell by modeling misbehavior to hell.

429. I believe my loved ones, Leah Chandler and William Chandler will go to hell if they continue to be deceived by the Defendant's encouragement of believing evil is good under the guise of Godliness.

430. I notice other loved ones in the community, I think of as Bible boys gone wild, who are deceived by the Defendant, into glorifying business greed, pride, or violence, while claiming to support Defendant and God, despite the fact I believe my God teaches love of money, pride and violence is wrong.

431. For instance, I notice my former grade school, schoolmate Sheldon Hudson, a government employee, Town Manager of Millsboro, located in Delaware, glorify business greed, Defendant President Donald Trump and God, thereby contributing to the illusion that supporting business greed and President Trump is Godly.

432. I believe my friend, Sheldon Hudson, will go to hell because he is deceived by the Defendant and by those the Defendant deceives into thinking business greed is good and Godly, unless he repents of such evil thinking.

433. I believe this court has the power to be not only a life saver, but an eternal life saver by safeguarding separation of church and state so Americans may worship or not according to the dictates of our conscience, not the dictates of the

government, through Defendant as the President of the United States, under the intrinsic persecution his shared support of religious beliefs create.

COUNT 1

UNLAWFUL ESTABLISHMENT OF GOVERNMENT RELIGION, IN VIOLATION OF THE ESTABLISHMENT CLAUSE OF THE 1st AMENDMENT APPLICABLE TO DEFENDANT VIA THE 5TH

434. Plaintiff, Meghan Kelly, repeats and incorporates by reference all of the above paragraphs and all of the below paragraphs, and the Exhibits and citations, the paragraphs refer to herein as admissible under nonhearsay and hearsay exceptions, including but not necessarily limited to, probative fact, state of mind, belief, present sense impression, periodical exception, excited utterance, admission by party opponent, as though set forth herein in the first instance.

435. The First Amendment provides in part: "Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof." (emphasis intended)." (U.S. Const. amend. I.)

436. The Defendant, acting in his official capacity as the President of the United States, has established the illusion of government sponsored or government backed religion or religious beliefs, by personally creating the appearance of supporting one perceived religious group through a series of collective behavior,

including but not necessarily limited to, the behavior noted herein, creating a “pervasive’ degree of government involvement with religious activity in (the present case,” in violation of the Establishment Clause applicable to the Defendant via the 1st and 5th Amendments. (Citing, *Lee v. Weisman*, 505 U.S. 577 (1992)); (Citing, U.S. Const. amend. I. and V.)

437. The Defendant, acting in his official capacity as the President of the United States, also governs through the illusion of religious authority, in an unholy union where religion is publicly used for Defendant’s vanity, meaning Defendant’s political and personal purpose in violation of the 1st and 5th Amendments, instead of maintaining separation of church and state.

438. Defendant, acting in his official capacity as the President of the United States openly accepts perceived or projected combined religious and political support from alleged Christians, creating the appearance that Defendant is not only a political leader, but a religious leader as well, in violation of the Establishment Clause applicable to the Defendant via the 5th Amendment.

439. The US Supreme Court held the “Establishment clause, at very least, prohibits government from appearing to take position on questions of religious belief or from making adherence to religion relevant in any way to person's standing in political community.” (*County of Allegheny v. American Civil*

Liberties Union Greater..., 492 U.S. 573 (1989), Abrogated by *Town of Greece, N.Y. v. Galloway*, U.S., May 5, 2014).

440. The Lemons test is not necessarily required under the facts of this Court which applies to laws passed, or government agents executing laws passed which may be unconstitutionally applied or unconstitutional on their face which is distinguished from the present case. (Citing, *Lemon v. Kurtzman*, 403 U.S. 602, 91 S.Ct. 2105, 29 L.Ed.2d 745.); (Also see *Lee v. Weisman*, 505 U.S. 577 (1992), where the Supreme Court held, “Reassessment of decision in *Lemon v. Kurtzman*, which set forth standards for evaluation of establishment clause cases, was not required in order to determine whether “nonsectarian” prayer could be offered at school graduation; “pervasive” degree of government involvement with religious activity in present case, to point of creating state-sponsored and state-directed religious exercise in public school, was sufficient to determine constitutionality without reference to Lemon test. U.S.C.A. Const.Amends. 1, 14.”)

441. Defendant as the chief executing authority, as the President of the United States, charged with executing laws, lawlessly acts, without foundation for any of his violations in statutory law, albeit, with the possible exception of Ex. Or. No. 13798 of May 4, 2017, 82 Fed. Reg. 21675, and possibly other executive orders that are not the focus of this cause of action.

442. Instead, Defendant behaves as a law unto himself.

443. Defendant's violations cause ongoing harm to Plaintiff.

COUNT II

FREE EXERCISE CLAUSE DEFENDANT SUBSTANTIALLY BURDENED PLAINTIFF'S FREE EXERCISE OF RELIGION IN VIOLATION OF 42 USC §§ 2000bb — 2000bb-4, and THE 1st AMENDMENT APPLICABLE TO DEFENDANT VIA THE 5TH AMENDMENT

444. Plaintiff, Meghan Kelly, repeats and incorporates by reference all of the above paragraphs and all of the below paragraphs, and the Exhibits and citations, the paragraphs refer to herein as admissible under nonhearsay and hearsay exceptions, including but not necessarily limited to, probative fact, state of mind, belief, present sense impression, periodical exception, excited utterance, admission by party opponent, as though set forth herein in the first instance.

445. Many Americans appear to remain under the unholy deception that political loyalty to Defendant, is loyalty to God, and any dissident to Defendant's policies or misbehavior, by me, or those like me, is an attack to their God.

446. I personally face persecution sponsored by the Defendant's illusion that Defendant is not only a political governing authority, but also a Godhead too, for exercising my free exercise of religion.

447. I also receive eternal harm because I believe those deceived by the Defendant's illusion of religious governing authority will not receive eternal life in heaven.

448. Every day, the Defendant exploits and encourages the illusion of religious governing authority by supporting one perceived religious belief, or suppressing different religious beliefs, my freedom to exercise my faith is substantially burdened by threat of persecution by private citizens who believe supporting Defendant supports God.

449. Every day, the Defendant exploits and encourages the illusion of religious governing authority by supporting one perceived religious belief or suppressing different religious beliefs, my freedom to exercise my faith is substantially burdened by threat of persecution by private citizens who believe supporting my God and my religion is evil since the Defendant's support of the Bible and God makes it appear Christians misbehave like the Defendant.

450. My free exercise of religion by seeking to feel a fuller type of love in heaven with those the Defendant misleads and deceives to damnation is substantially burdened by Defendant's excessive entanglement of religion with government in violation of the 1st Amendment applicable to the Defendant via the 5th Amendment and in violation of 42 USC §§ 2000bb — 2000bb-4.

451. My free exercise of religion to spread the word without government sponsored private bought or bartered for private persecution is substantially burdened and chilled.

452. The Defendant sells deception, lies, as truth, I believe misleading many to harm and hell, as they accept the illusion in place of truth.

453. Infringement of First Amendment rights are generally not compensable by money damages and are, therefore considered irreparable, as freedoms.

454. The harm noted herein, such as the suppression of my freedom to worship or not according to the dictates of my conscience without government sponsored persecution is certainly irreparable.

455. Given the fundamental rights at issue here, and the requirement that the Defendant must prove his violations are “in furtherance of a compelling governmental interest; and the least restrictive means of furthering that compelling governmental interest,” somehow more important than Plaintiff’s freedom to freely exercise her religion without government sponsored persecution, I have a high likelihood of success on the merits of my claim. 42 USCS § 2000bb-1(b)(1)(2).

456. Defendant’s violations cause ongoing harm to Plaintiff.

COUNT III

**ESTABLISHMENT CLAUSE VIOLATION OF THE 1st AMENDMENT
APPLICABLE TO DEFENDANT VIA THE 5TH AMENDMENT
RELATING TO THE EXECUTIVE ORDER 13798 of May 4, 2017, 82 Fed.
Reg. 21675**

457. Plaintiff, Meghan Kelly, repeats and incorporates by reference all of the above paragraphs and all of the below paragraphs, and the Exhibits and citations, the paragraphs refer to herein as admissible under nonhearsay and hearsay exceptions, including but not necessarily limited to, probative fact, state of mind, belief, present sense impression, periodical exception, excited utterance, admission by party opponent, as though set forth herein in the first instance.

458. Defendant passed executive order 13798 of May 4, 2017, 82 Fed. Reg. 21675 (herein also referred to “executive order”), allowing religious entities to donate to political campaigns without losing their tax free status.

459. Defendant’s executive order allows religious groups to buy favors or loyalty through donations to those in power or those seeking government power.

460. Buying power or bartering for power by granting churches the ability to donate to politicians and political groups, with money or donations parishioners gave churches or religious entities, to seek the churches’ self gain, material gain,

loyalty or favors, instead of religious gain, is not freedom. It is for sale. It is not free speech, but is bought speech.

461. The cost of permitting payments via donations or support to politicians by religious organizations via the executive order is suppressing my Constitutionally protected freedom to worship or not according to the dictates of my conscience, not the dictates of government backed religious organizations, under threat of government sponsored private persecution or actual government persecution.

462. The cost of selling religious organizations power and influence through the executive order is essentially allowing the Defendant to sell what is not his, the freedoms of Americans from enslavement to the governing class's religious dictates under the threat of government backed persecution.

463. Churches and religious entities who donate to politicians or political groups, reasonably perceive the politicians or political groups owe the entities a benefit, such as loyalty to certain ideas.

464. The executive order creates a bought or bartered for religious interest in religious organizations supporting politicians.

465. As a result, some members of religious groups have taught parishioners to persecute those who do not align with the religious group's political interests, as not a genuine Christian.

466. The executive order creates a bought or bartered for political interest in political organizations supporting religious groups.

467. Churches and religious entities who donate are tempted to be biased and loyal to those they support because they reasonably perceive such politicians or political groups as owing the religious entities a benefit, such as loyalty to certain ideas.

468. As a result of this inherent bias or loyalty of religious organizations to serve those who serve them thereby serving themselves, (which I believe reflects the image of Satan), members of religious groups have taught parishioners to persecute those who do not align with the religious group's political interests, distinguished from religious interests, as not a genuine Christian.

469. I have faced increased government sponsored private persecution as a liberal Christian as a result of the implementation of the executive order.

470. My free exercise has been in effect substantially burdened by the application of the executive order.

471. What constitutes an "establishment of religion" is often governed under the three-part test set forth by the U.S. Supreme Court in *Lemon v. Kurtzman*, 403 U.S. 602 (1971). Under the "Lemon" test, government can assist religion only if (1) the primary purpose of the assistance is secular, (2) the assistance must neither promote nor inhibit religion, and (3) there is no excessive entanglement between church and state.

472. Here, the primary purpose of the executive order is not free speech, but bought or bartered for religious political speech used to influence elections via campaign donations or support.

473. The alleged secular speech cannot be divided from the unholy union tempting religious groups to seek their own power and profit in place of a true religious purpose, in exchange for donating or supporting the candidates who have the power to grant them their desires.

474. The executive order is using religion and religious groups for politician's vanity, meaning political purpose, creating an unnatural religious loyalty to party and people within a party by the religious groups who barter or buy loyalty, through donations or support.

475. The executive order has the impact of promoting religions which align with political beliefs and inhibiting religions who do not align with such political beliefs.

476. The executive order encourages and exacerbates excessive entanglement between church and state.

477. I believe the executive order not only violates the establishment clause of the first amendment applicable to Defendant via the 5th and 42 USC §§ 2000bb — 2000bb-4, but it also tempts Christians and churches to sin against God by using God's name in vain, for man's purpose in place of God's will, misleading many to harm and hell.

478. Defendant has promoted a religion, a type of Christianity, that I believe does not align with God's teachings.

452. Defendant has facilitated bail outs to religious entities or churches with business bail out money, which creates an unnatural religious whored loyalty to Defendant in exchange for the hope of future donations to Defendant, or members of the Defendant's party, the Republican party with the expectation that churches are taken care of with profit and power which is wrong because it compromises politician's focus on caring for the people they are charged to serve, instead of

those who take care of the politicians, those who donate or support their campaigns.

479. Defendant's violations cause ongoing harm to Plaintiff.

PRAYER FOR RELIEF

WHEREFORE, Meghan Kelly respectfully requests that this Honorable Court:

1. Enter an Order permanently enjoining and restraining the Defendant from forcing religious views or sponsoring religion, while employed as the President of the United States, so as not to substantially burden Plaintiff's free exercise of religion.

2. Enter an Order permanently enjoining and restraining the Defendant, the President of the United States, from persecuting those with diverse religious beliefs, based on such perceived religious beliefs, while acting as the President of the United States.


3. Enter an Order the Defendant shall award Plaintiff costs to the extent authorized by law or Court rule, and other such relief as the Court deems proper and just, if applicable.

4. Grant any injunctive or other relief that this Court deems just, equitable, and proper.

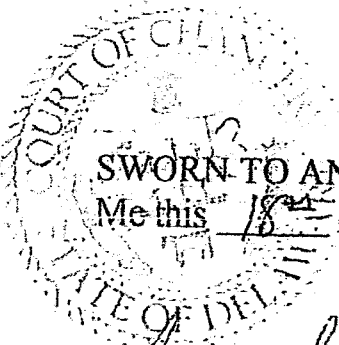


VERIFICATION

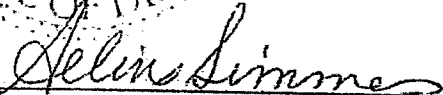
I, Meghan Kelly, on behalf of myself, verify that the facts set forth in the foregoing *Verified Complaint of Meghan Kelly* are true and correct to the best of my knowledge, information and belief.



Meghan Kelly



SWORN TO AND SUBSCRIBED before
Me this 18th day of September, 2020.



Notary Public Court Clerk
Printed Name: Aline Simmons

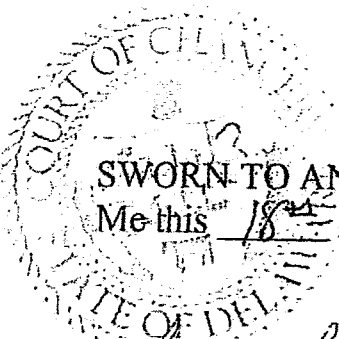
My Commission Expires: _____



VERIFICATION

I, Meghan Kelly, on behalf of myself, verify that the facts set forth in the foregoing *Verified Complaint of Meghan Kelly* are true and correct to the best of my knowledge, information and belief.

Meghan Kelly



SWORN TO AND SUBSCRIBED before
Me this 18th day of September, 2020.

Notary Public Court Clerk
Printed Name: Aline Simmons

My Commission Expires: _____

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Appendix B The Delaware Supreme Court Order, denying a Rehearing, *Kelly v. Trump*, No. 119, 2021 (Del. July 19, 2021)

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Appendix 1-C Email from the Chancery Court staff confirming the Vice Chancellor's opinion was not mailed to Defendant

Appendix D The unpublished Master's Final report recommending dismissal as legally frivolous for Plaintiff's failure to allege standing available at *Kelly v. Trump*, No. CV 2020-0809-PWG, 2020 WL 6392865 (Del. Ch. Nov. 2, 2020), report and recommendation adopted, (Del. Ch. 2021), *aff'd*, No. 119, 2021, 2021 WL 2836635

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Appendix E Petitioner's Delaware Supreme Court Brief

Exhibit A-4 to Appendix E 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, and exhibits thereto, Exhibit 55 of the brief below, the December 1, 2020 letter regarding due process concerns to the Master, and the October 19, 2020 letter to the Master regarding the fact I am pro se, not represented by counsel, (D.I. 89-90 also separately, D.I. 54 and D.I. 36)

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Exhibit 9 to Appendix F An Executive Order in issue on this appeal (D.I. 63)

Exhibit 10 to Appendix F Article, The Hill, *Trump: Jews who vote Democrat show 'lack of knowledge or great disloyalty'*, by Brett Samuels, 08/20/19, 03:38 PM.
(D.I. 63)

Exhibit 11 to Appendix F MSNBC, *Trump calls for discrimination against Muslims,*

By Jane C. Timm, 12/07/15 (D.I. 63)

Exhibit 12 to Appendix F Article, The Hill, *Ivanka Trump will have an official*

White House position, By Olivia Beavers, 03/29/17 (D.I. 63)

Exhibit 13 to Appendix F Article, *The New York Times, The Long History Behind*

Donald Trump's 'America First' Foreign Policy, By Lily Rothman, March 28, 2016

(D.I. Exhibit 63)

Exhibit 14 to Appendix F Article, *The Hill Trump: I will always put America first,*

By Max Greenwood, 09/19/17 (D.I. 63)

Exhibit 15 to Appendix F The Federal Criminal laws I based the 5 articles of

impeachment, to impeach President Trump on (D.I. 63)

Exhibit 16 to Appendix F *On Russian bounties, what did Trump know and when did*

he know it?, By Steve Benen, June 30, 2020, 8:00 AM EDT (D.I. 63)

Exhibit 17 to Appendix F Article, NPR, *'You Can Do Anything': In 2005 Tape,*

Trump Brags About Groping, Kissing Women, By Jessica Taylor, October 7, 2016

(D.I. 63)

Exhibit 18 to Appendix F Article, Business Insider, *11 insults Trump has hurled at*

women, by John Walsh, Oct 17, 2018 (D.I. 63)

Exhibit 19 to Appendix F Article The Guardian, *The Trump allegations A list of the sexual misconduct accusations made against Donald Trump. He has denied the allegations*, by Lucia Graves and Sam Morris, November 6, 2019 (D.I. 63)

Exhibit 20 to Appendix F Article, ABC News, *Donald Trump Sells Chinese Goods Despite Accusing China of Stealing US Jobs, Trump says he's "obligated" to buy Chinese goods while China has U.S. jobs.*, By Susanna Kim, June 17, 2015 (D.I. 61)

Exhibit 21 to Appendix F Article, CNN, *Trump wants to create 10 million jobs in 10 months. Here's why that might be tricky*, By Anneken Tappe, CNN Business, August 28, 2020 (D.I. 62)

Exhibit 22 to Appendix F Article, USA TODAY, *Fact check: President Donald Trump donates his salary, but he still makes money*, by Molly Stellino, published July 11, 2020 (D.I. 63)

Exhibit 23 to Appendix F Article, *'No Blame?'* ABC News *finds 54 cases invoking 'Trump' in connection with violence, threats, alleged assaults. President Donald Trump insists he deserves no blame for divisions in America*, By, Mike Levine (D.I. 64)

Exhibit 24 to Appendix F Article, Washington Post, *The Trump administration said*

that militarizing the police reduces crime. Is that true, by Ayse Eldes and Kenneth

Lowande, June 1, 2020 (D.I. 71)

Exhibit 25 to Appendix F CBS News, "*When the looting starts, the shooting starts*":

Trump tweet flagged by Twitter for "glorifying violence", May 29, 2020 (D.I. 71)

Exhibit 26 to Appendix F copy of the web site worldometer, to show healthcare is

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Exhibit 27 to Appendix F The Hill, *Trump eases ban on political activity by*

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Exhibit 28 to Appendix F Washington Post, *Paula White, Trump's key spiritual*

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Exhibit 29 to Appendix F National Catholic Reporter, *The key evangelical players*

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Exhibit 30 to Appendix F Fox News, *Trump responds to Milley apology for*

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Exhibit 31 to Appendix F article, The Hill, *Trump targets Democrats over Pledge of*

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Exhibit 32 to Appendix F Article, HuffPost, *Trump Claims COVID-19 Is God*

Testing Him After He Built 'Greatest Economy In History' The president described

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Carol Kuruvilla, 08/17/2020 (D.I. 66)

Exhibit 33 to Appendix F Article, The Rolling Stone, *Trump: People Are Saying*

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Exhibit 34 to Appendix F Article, Fox News, *'I hope it's true': Trump responds to*

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Exhibit 35 to Appendix F Article, Fox News, *University professors say more church*

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Exhibit 36 to Appendix F Article, CBS NEWS, *Trump tweets quote calling him the*

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Exhibit 37 to Appendix F Article, The Hill, *Trump: 'We moved the capital of Israel*

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Exhibit 39 to Appendix F *The Hill, Thousands of Catholic churches received PPP loans*: report, By Lauren Vella, 05/08/20 (D.I. 73)

Exhibit 40 to Appendix F *BBC, What are the sexual allegations against Donald Trump?*, dated June 25, 2019 (D.I. 74)

Exhibit 41 to Appendix F *Religious News Service, Paula White to head Trump's faith office*, by Jack Jenkins and Adelle M. Banks, November 1, 2019 (D.I. 75)

Exhibit 42 to Appendix F *The Hill, Trump claims Biden is 'against God' and will 'hurt the Bible'* By Brett Samuels, 08/06/20 (D.I. 76)

Exhibit 43 to Appendix F Documents regarding healthcare including: 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 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

Exhibit 44 to Appendix F Tweet by President Trump, "DEMS WANT TO SHUT DOWN CHURCHES PERMENANTLY. HOPE YOU SEE WHAT IS HAPPENING. VOTE NOW!" (D.I. 78)

Exhibit 45 to Appendix F The New York Times, *A Regulatory Rush by federal agencies to secure Trump's legacy*, initially posted 10/16/2020, my copy is dated 10/17/2020. (D.I. 79)

Exhibit 46 to Appendix F Article appellant drafted concerning 100s and thousands of dollars not getting into the Delaware coffers which could be easily corrected with the legislative pen, My comments to my corporate bar section, ignored, related to my concerns the baby boomers may be screwed out of their retirement and insurance if we do not make changes to care for them instead of what is easier and

more profitable for us, the lawyers, and our potential clients, (D.I. 80)

Exhibit 47 to Appendix F MSN, Daily News, *Trump and aides attend indoor church rally in Vegas without masks*, By Theresa Baine, 10/18/2020.

(D.I. 81)

Exhibit 48 to Appendix F Withdrawn unsubmitted article concerning a recent US Supreme Court case. *Freedoms are not for sale, business is not religion, business greed is not God* (D.I. 82)

Exhibit 49 to Appendix F The Hill, *Eric Trump claims his father "literally saved Christianity,"* By Celene Castronuovo, 10/7/20. (D.I. 83)

Exhibit 50 to Appendix F Proof, documentation, Appellant sought a waiver to run for President and for Federal house of representatives without serving violating her religious beliefs by collecting donations and signatures in violation of the Bible's teachings. (D.I. 84)

Exhibit 51 to Appendix F Pamphlets sent out when I ran for local office referred in the brief, where I did not violate Jesus's teachings in Matthew 6:1-5 by organized fundraising or false charity (D.I. 85)

Exhibit 52 to Appendix F Proof my health is affected by government religion (D.I. 86)

Exhibit 53 to Appendix F BBC, *Trump inciting violence, warns election official*, 12/2/20 (D.I. 87)

Exhibit 54 to Appendix F The Washington Post, *Trump wants to change the libel*

laws. Here's how they came to be, By Patricia U. Bonomi, June 6, 2019 (D.I. 88)

Appendix G Letter to the Supreme Court. Dated July 12, 2021, regarding a

Chancery Court staff member directing me to cross out the address to the DE

lawyer in order to prevent service, and the attached subpoenas, dated October 12,

2020

Appendix H Excerpts from *Creature of Jeckyll Island, a Second look at the Federal*

Reserve, by Edward Griffin, 7th printing 1998, 3rd Ed., by American Media

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.”

STATUTES

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 1-b

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Case History Search

Search Created:
4/1/2021 13:32:15 GMT-0400 (Eastern Daylight Time)

Court: DE Court of Chancery **Judge:** Griffin, Patricia **File & ServeXpress** 9/22/2020
Civil Action
Division: N/A **Case Number:** 2020-0809-PWG **Live Date:**
Case Type: Civil Action **Case Name:** Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al **Document(s) Filed:** 168
Date Range: All

1-37 of 37 transactions <<Prev Page 1 of 1 Next>>

Transaction	Date/Time	Option	Case Number Case Name	Authorizer Organization	#	Document Type	Document Title	Size
66459051	3/26/2021 2:10 PM EDT	File And Serve	2020-0809- PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Paul A Fioravanti Jr, DE Court of Chancery Civil Action	95	Order	Order Overruling Exceptions to Master's Final Report	0.2MB
66183984	1/6/2021 2:52 PM EST	File And Serve	2020-0809- PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	93	Exhibits	Meg Kelly break of all Exhibit Emailed for Register in Chancery	0.1MB
					94	Exhibits	Appendix to the Register In Chancery	0.1MB
66181947	1/6/2021 1:40 PM EST	File And Serve	2020-0809- PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	72	Exhibits	Exhibit E Exhibit 38 (continues of Ex 10 - 42)	0.3MB
					73	Exhibits	Exhibit E Exhibit 39 (continues of Ex 10 - 42)	0.1MB
					74	Exhibits	Exhibit E Exhibit 40 (continues of Ex 10 - 42)	0.5MB
					75	Exhibits	Exhibit E Exhibit 41 (continues of Ex 10 - 42)	0.4MB
					76	Exhibits	Exhibit E Exhibit 42(The Hill, Trump claims Biden is 'against God' and will 'hurt the Bible' By Brett Samuels, 08.06.20.)	0.1MB
					77	Exhibits	Exhibit F Exhibit 43 (Plaintiff's articles relating to healthcare, college transcript, teaching license, and law school transcript)	0.8MB
					78	Exhibits	Exhibit F Exhibit 44 (Tweet by Defendant)	0.1MB
79	Exhibits	Exhibit F Exhibit 45(The New York Times, A Regulatory Rush by Federal Agencies to Secure Trump's	0.3MB					

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		Legacy, by Eric Lipton, Oct. 16, 2020	
80	Exhibits	Exhibit F, Exhibit 46, newspaper article Plaintiff drafted to combat unjust decrees, and a suggestion Plaintiff made during a bar section meeting.	0.4MB
81	Exhibits	Exhibit F, Exhibit 47, MSN News, Trump and his aides attend packed indoor church rally in Vegas without masks, by Theresa Baine, 10.18.2020	0.1MB
82	Exhibits	Exhibit F, Exhibit 48, Draft article not perfected for the newspapers.	0.1MB
83	Exhibits	Exhibit F, Exhibit 49, the Hill, Eric claims his faith 'laterally saved Christianity. by Esline Castro Nuovo, 10.07.20	0.1MB
84	Exhibits	Exhibit F, Exhibit 50, Evidence of seeking to run for President of the United States and Federal House of representatives without violating Plaintiff's religious beliefs.	1.2MB
85	Exhibits	Exhibit F, Exhibit 51(Evidence of seeking to run for local office without compromising Plaintiff's belief in Jesus)	1.0MB
86	Exhibits	(Exhibit F, Exhibit 52, A high blood pressure reading)	0.1MB
87	Exhibits	Exhibit F, Exhibit 53,(BBC ,trump inciting violence, warns Georgia election Official posted by BBC, without the name of the author on 12.2.2020)	0.3MB
88	Exhibits	Exhibit F, Exhibit 54(Washington Post, Trump wants to change the libel laws. Here's how they came to be, by Patricia U. Bonomi, June 6,2019,)	0.1MB
89	Exhibits	Exhibit F, Exhibit 55, PLTF's Letter to the Court, dated December 1, 2020, Regarding her due process concerns and her letter dated October 19, 2020)	0.6MB
90	Exhibits	Exhibit F, Exhibit 55, PLTF's Letter to the Court, dated December 1, 2020, Regarding her due process	0.6MB

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concerns and her letter dated October 19, 2020)

					91	Exhibits	Exhibit G(Appendix, Docket Entrees)	0.3MB
					92	Exhibits	Exhibit H (Table of Exhibits, Appendix)	0.4MB
66181944	1/6/2021 1:39 PM EST	File And Serve	2020-0809- PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	64	Exhibits	Exhibit E Exhibit 23 (continues of Ex 10 - 42)	1.5MB
					65	Exhibits	Exhibit E Exhibit 31 (continues of Ex 10 - 42)	0.2MB
					66	Exhibits	Exhibit E Exhibit 32(continues of Ex 10 - 42)	0.2MB
					67	Exhibits	Exhibit E Exhibit 33((continue of Ex 10 - 42)	0.1MB
					68	Exhibits	Exhibit E Exhibit 34(continues of Ex 10 - 42)	0.2MB
					69	Exhibits	Exhibit E Exhibit 35 (continues of Ex 10 - 42)	0.5MB
					70	Exhibits	Exhibit E Exhibit 36(continues of Ex 10 - 42)	0.3MB
					71	Exhibits	Exhibit E Exhibit 37 (continues of Ex 10 - 42)	0.1MB
						Exhibits	Exhibit E Exhibit 24 (continues of Ex 10 - 42)	0.2MB
						Exhibits	Exhibit E Exhibit 25(continues of Ex 10 - 42)	0.1MB
						Exhibits	Exhibit E Exhibit 26 (continues of Ex 10 - 42)	1.4MB
						Exhibits	Exhibit E Exhibit 27 (continues of Ex 10 - 42)	0.1MB
						Exhibits	Exhibit E Exhibit 28 (continues of Ex 10 - 42)	0.1MB
						Exhibits	Exhibit E Exhibit 29(continues of Ex 10 - 42)	0.1MB
						Exhibits	Exhibit E Exhibit 30 (continues of Ex 10 - 42)	0.4MB
66181936	1/6/2021 1:36 PM EST	File And Serve	2020-0809- PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	61	Exhibits	Exhibit E Exhibit 20 (continues of Ex 10 - 42).	0.1MB
					62	Exhibits	Exhibit E Exhibit 21 (continues of Ex 10 - 42)	0.1MB
					63	Exhibits	Exhibit E Exhibit 22 (continues of Ex 10 - 42)	0.3MB
						Exhibits	Exhibit B Exhibit 8(Documents Pro Se Plaintiff sent to Law makers	0.2MB
						Exhibits	Exhibit B Exhibit 9 (Executive Order In Issueex	0.1MB
						Exhibits	Exhibit C Motion for Temporary Restraining Order	0.2MB

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						Exhibits	Exhibit D(PLTF's Memo of law in support of mot. for TRO and Mot to Expedited Relief	0.4MB
						Exhibits	Exhibit E Exhibit 10 (Newspapers and websites PLTF referred to in the Complaint)	0.2MB
						Exhibits	Exhibit E Exhibit 11(continues of Ex 10 - 42).	0.2MB
						Exhibits	Exhibit E Exhibit 12 (continues of Ex 10 - 42)	0.1MB
						Exhibits	Exhibit E Exhibit 13 (continues of Ex 10 - 42)	0.3MB
						Exhibits	Exhibit E Exhibit 14 (continues of Ex 10 - 42)	0.1MB
						Exhibits	Exhibit E Exhibit 15 (continues of Ex 10 - 42).	0.5MB
						Exhibits	Exhibit E Exhibit 16 (continues of Ex 10 - 42)	0.4MB
						Exhibits	Exhibit E Exhibit 17 (continues of Ex 10 - 42).pdf	0.4MB
						Exhibits	Exhibit E Exhibit 18 ((continues of Ex 10 - 42)	0.5MB
						Exhibits	Exhibit E Exhibit 19 (continues of Ex 10 - 42)	1.4MB
66181927	1/6/2021 1:30 PM EST	File And Serve	2020-0809- PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	59	Brief	Pro Se Meghan Kelly Plaintiff's Brief in support of Exceptions to Motion to Master's Final Report	1.6MB
					60	Brief	Part 2 of 2 of Pro Se Plaintiff's Brief pages 41- 66	1.0MB
						Certificate of Service	Certificate of service for documents to U.S. Attorney General William Barr, esq.	0.1MB
						Letter	Letter from Pro Se Plaintiff Meghan Kelly regarding word Count	0.1MB
						Declaration	Declaration of Meghan Kelly	0.1MB
						Exhibits	Receipt of Mailing addressed to William Barr, Esq.	0.1MB
						Certificate of Service	Certificate of Service of the Brief.	0.1MB
						Exhibits	Exhibit A part 1 of 2(Complaint first section)	2.7MB
						Exhibits	Exhibit A part 2 of 2(complaint second section)	1.9MB
						Exhibits	Exhibit B Exhibit 1 Plaintiff's letters confirming she filed two separate ODC complaints)	0.2MB

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						Exhibits	Exhibit B Exhibit 2 copy of complaint	2.7MB
						Exhibits	Exhibit B Exhibit 3 emails concerning Plaintiff's request to affirm.	0.1MB
						Exhibits	Exhibit B Exhibit 4 Two letters to family court	0.1MB
						Exhibits	Exhibit B Exhibit 5 Letter to Hon. Judge Ridgley.	0.1MB
						Exhibits	Exhibit B Exhibit 6 Email sent to Senator Carper relating to Plaintiff's recommendations relating to ISIS and using God's name in vain.	0.1MB
						Exhibits	Exhibit B Exhibit 7 (Five articles of Impeachment)	3.9MB
66181955	12/14/2020 4:50 PM EST	File And Serve	2020-0809- PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	58	Letter	Letter by Pro Se Meghan Kelly attachment as Exhibit A.	3.5MB
66183897	12/14/2020 4:48 PM EST	File And Serve	2020-0809- PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	56	Letter	Letter addressed to the Court, dated 12.12.20 from Pro se Plaintiff Meghan Kelly.	0.1MB
					57	Certificate of Service	Certificate of Service to US Attorney General William Barr, Esq	0.1MB
66163090	12/7/2020 9:09 AM EST	File Only	2020-0809- PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Patricia Griffin, DE Court of Chancery Civil Action	55	Letter	Master Griffin's Letter to Meghan Kelly, Pro Se Plaintiff, in Response to Ms. Kelly's 12-1-20 Letter to Master Griffin Regarding Due Process Concerns	0.1MB
66149766	12/1/2020 2:36 PM EST	File Only	2020-0809- PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	54	Letter	Letter to Master Griffin from Meghan Kelly, Pro Se Plaintiff, filed on 12-1-20. RE: Due Process Concerns	0.2MB
						Exhibits	Exhibit A filed by Meghan Kelly, Pro Se Plaintiff, on 12-1-20.	0.3MB
						Certificate of Service	Certificate of Service filed by Meghan Kelly, Pro Se Plaintiff, on 12-1-20.	0.1MB
66145529	11/30/2020 2:29 PM EST	File And Serve	2020-0809- PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Paul A Fioravanti Jr, DE Court of Chancery Civil Action	53	Letter	Letter to Ms. Kelly from Vice Chancellor Fioravanti in response to her request in the November 26, 2020 letter.	0.1MB
66145176	11/30/2020	File Only	2020-0809-	Register in	52	Letter	Letter to Vice Chancellor	0.1MB

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	1:10 PM EST		PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Chancery, DE Court of Chancery Civil Action			Fioravanti from Meghan Kelly seeking word extension on brief with Certificate of Service. Filed 11-30-20. • Linked to (1)		
66096667	11/10/2020 11:10 AM EST	File Only	2020-0809- PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	51	Letter	Letter from Meghan Kelly dated 11.10.2020	0.2MB	
						Exhibits	Exhibits A,B, C	0.4MB	
						Certificate of Service	Certificate of Service 11.10.2020	0.1MB	
66096365	11/10/2020 10:12 AM EST	File And Serve	2020-0809- PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Paul A Fioravanti Jr, DE Court of Chancery Civil Action	50	Order	Order Governing Briefing on Exceptions to Master's Final Report • Linked from (1)	0.1MB	
66093944	11/9/2020 3:28 PM EST	File Only	2020-0809- PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Andre G Bouchard, DE Court of Chancery Civil Action	49	Letter	Case Reassignment Letter	0.1MB	
66092075	11/9/2020 10:59 AM EST	File Only	2020-0809- PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	48	Notice of Service	Notice of Service of the Certificate of Service	0.3MB	
66092023	11/9/2020 10:53 AM EST	File Only	2020-0809- PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	47	Exceptions to Masters Report	Notice of Exceptions to Masters Final Report • Linked to (1)	0.1MB	
						Letter	Letter from Meghan Kelly Dated 11.09.2020	0.7MB	
						Certificate of Service	Certificate of Service	0.1MB	
66072815	11/2/2020 1:33 PM EST	File Only	2020-0809- PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Patricia Griffin, DE Court of Chancery Civil Action	46	Masters Report	Final Master's Report • Linked from (1)	0.1MB	
66067640	10/30/2020 10:35 AM EDT	File Only	2020-0809- PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	43	Letter	Letter dated Oct. 30, 2020	0.2MB	
						44	Summons	Summons issued President Donald J. Trump, The White House- Return is on FSX transaction # 66033468	0.1MB
						45	Letter	Letter dated October 28, 2020	0.1MB
							Exhibits	Exhibits to Letter dated Oct. 30, 2020	0.6MB

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						Exhibits	Exhibits to Letter dated Oct. 28, 2020	0.5MB
66035897	10/20/2020 9:31 AM EDT	File Only	2020-0809-PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	41	Affidavit	(shows Notary Seal same as #39 on case listing)Affidavit of Service - President Donald J. Trump, The White House, President Trump c.o Attorney General William Barr	0.5MB
					42	Affidavit	(shows Notary Seal same as #40 on case listings)Affidavit of Service of President Trump c.o Attorney General, Attorney General William Barr, Esquire	0.7MB
66033468	10/19/2020 2:46 PM EDT	File Only	2020-0809-PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	36	Letter	Letter from Meghan Kelly dated Oct. 19, 2020 in ref Plaintiff Not officer of the Court Economic Crash Forum	0.2MB
					37	Letter	Letter from Meghan Kelly dated Oct. 19, 2020 in re Constitutional Crisis	0.2MB
					38	Letter	Letter in ref Permission to bring electronic devices in court for hearings	0.1MB
					39	Affidavit	Affidavit of Service - President Donald J. Trump, The White House, President Trump c.o Attorney General William Barr	0.5MB
					40	Affidavit	Affidavit of Service of President Trump c.o Attorney General, Attorney General William Barr, Esquire	0.6MB
						Proposed Order	Proposed Order to use electronic devices in court	0.1MB
66016058	10/13/2020 1:24 PM EDT	File And Serve	2020-0809-PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	35	Exhibits	Exhibits A and B supplementing letter to Master Griffin filed by Meghan Kelly on 10-13-20. • Linked to (1)	0.2MB
66015607	10/13/2020 1:05 PM EDT	File And Serve	2020-0809-PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	32	Certificate of Service	Certificate of Service in affidavit format with supporting documents, USPS tracking and summons, filed by Meghan Kelly on 10-13-20. Service issued upon Trump in care of Attorney General via certified mail, return receipt. • Linked to (4)	0.2MB
					33	Letter	Letter to Master Griffin	0.2MB

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							from Meghan Kelly dated 10-13-20. RE: Inadvertently handed in wrong Motion to Amend Second Amended Complaint.	
					34	Motion	Plaintiff's Motion to Amend the Amended Complaint with a Second Amended Complaint filed by Meghan Kelly on 10-13-20.	0.2MB
						Proposed Order	Proposed Chancery Court Rule Emergency Order filed by Meghan Kelly on 10-13-20. RE: Requesting that all notary and paper filing requirements be waived sending service electronically.	0.1MB
						Proposed Order	Proposed Chancery Court Rule 55 Default Against Defendant filed by Meghan Kelly on 10-13-20.	0.1MB
66013342	10/13/2020 8:39 AM EDT	File Only	2020-0809-PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	31	Proposed Order	Proposed Amended Order to Second Complaint	0.1MB
66012079	10/12/2020 3:18 PM EDT	File Only	2020-0809-PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	30	Proposed Order	Proposed Order requesting additional copies of pleadings	0.1MB
66011956	10/12/2020 3:03 PM EDT	File Only	2020-0809-PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	28	Proposed Order	Proposed Order to Issued Summons - Federal Court Rule 4 (I)	0.1MB
					29	Letter	Letter of Instructions to issued upon Civil Process Clerk (Fed Rule 4(i))	0.1MB
						Letter	Letter of Instructions upon Attorney General, William Barr, Esquire (Fed Rule 4(I))	0.1MB
						Letter	Letter of Instructions to issued upon President Donald J. Trump (Fed Rule 4(I))	0.1MB
66011875	10/12/2020 2:55 PM EDT	File Only	2020-0809-PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	26	Motion	Plaintiff's Motion to Amend the Amended Complaint with a Second Amended Complaint	0.2MB
					27	Amended	Plaintiff's Second Amended	1.4MB

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						Complaint	Complaint (part 1 of 2)	
						Proposed Order	Proposed Order to Motion to Second Amended Complaint	0.1MB
						Amended Complaint	Plaintiff's Second Amended Complaint (Part 2 of 2)	1.7MB
						Verification to Complaint	Verification to Second Amended Complaint	0.1MB
						Exhibits	Exhibits Red Line Second Amended Complaint (part 2 of 2)	2.7MB
						Exhibits	Exhibits - Black Line Second Amended Complaint (Part 2 of 2)	1.1MB
66010390	10/12/2020 9:23 AM EDT	File Only	2020-0809-PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	25	Letter	Letter from Plaintiff dated Oct. 9, 2020 (RIC received 10.9.2020)	0.1MB
						Exhibits	Exhibits to Letter dated Oct. 9, 2020	0.2MB
65995075	10/6/2020 4:21 PM EDT	File Only	2020-0809-PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	23	Issuance of Summons	Issued 1 Summons 1 copy (3104) to Plaintiff 10.05.2020	0.2MB
					24	Issuance of Summons	Issued 1 Summons 1 copy to Plaintiff 10.05.2020 • Linked from (1)	0.2MB
65994549	10/6/2020 3:29 PM EDT	File Only	2020-0809-PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	20	Letter	Letter of Instructions for Amended Complaint	0.1MB
					21	Letter	Letter from Meghan Kelly dated Oct. 5, 2020. (RIC Office explained the amended complaint's exhibits and orders are not court stamped since the main document of amended complaint was stamped)	0.2MB
					22	Notice of Service	Notice of Service of Complaint & Amended Complaint	0.3MB
						Letter	Letter of Instructions of Amended Complaint	0.1MB
						Letter	Letter of Instructions to serve US Attorney Office Wilmington DE via 10 Del. C. Section 3104 (Plaintiff said to efile this letter of instructions and for the RIC Office not to draft summons)	0.1MB
						Notice of Service	Notice of Service of Complaint and Amended Complaint • Linked from (1)	0.4MB

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65989954	10/5/2020 3:50 PM EDT	File Only	2020-0809- PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	16	Motion	Plaintiff's Motion to Amend the Complaint and Motion for Extension to serve both the Complaint and the Amended Complaint together • Linked from (1)	0.2MB
					17	Proposed Order	Proposed Order to Amend the Complaint	0.1MB
					18	Amended Complaint	Amended Complaint • Linked from (1)	1.4MB
					19	Proposed Order	Proposed Order asking additional relief	0.1MB
						Amended Complaint	Amended Complaint part 2 of 2 • Linked from (1)	1.6MB
						Verification to Complaint	Verification to Amended Complaint	0.1MB
						Exhibits	Exhibits- Red line Amended Complaint	1.2MB
						Exhibits	Exhibits- Red Line Amended Complaint part 2 of 2	1.4MB
65975916	9/30/2020 8:41 AM EDT	File Only	2020-0809- PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	14	Letter	Letter of Instructions (Civil process clerk)	0.1MB
					15	Letter	Letter of instructions (US Attorney General)	0.1MB
						Issuance of Summons	Issued 1 Summons (3104) 1 copy to Plaintiff via U.S. Mail 09.30.2020.	0.2MB
						Issuance of Summons	Issued 1 Summons (3104) 1 copy to Plaintiff via US Mail 09.30.2020.	0.2MB
65960754	9/24/2020 10:49 AM EDT	File Only	2020-0809- PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	13	Issuance of Summons	Issued 2 Summons (3104) 2 copies to Plaintiff 09.23.2020.	0.3MB
65953526	9/22/2020 1:35 PM EDT	File Only	2020-0809- PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	12	Letter	Letter of Instructions in ref Service	0.1MB
65953339	9/22/2020 1:17 PM EDT	File Only	2020-0809- PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	6	Motion	Plaintiff's Motion to Expedite	0.1MB
					7	Motion for Temporary Restraining Order	Motion for Temporary Restraining Order	0.2MB
					8	Memorandum	Memorandum of Law support of Plaintiff's Motion	0.3MB

4/1/2021

File & ServeXpress

for TRO and Motion to Expedited

					9	Proposed Order	Proposed Final Order	0.1MB
					10	Letter	Letter in ref Chancery Rule 4 (7) of Service	0.2MB
					11	Letter	Letter of Instructions in Ref Service	0.1MB
						Proposed Order	Proposed Order to Expedite	0.1MB
						Proposed Order	Proposed Order for Temporary Restraining Order	0.1MB
						Proposed Order	Proposed Order for Service of Rule 4 (d) (7)	0.1MB
65953103	9/22/2020 12:57 PM EDT	File Only	2020-0809-PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	4	Other	Complaint (Part 2 of 4)	13.4MB
					5	Verification to Complaint	Verification to Complaint	0.1MB
						Other	Complaint (Part 3 of 4)	5.3MB
						Other	Complaint (Part 4 of 4)	5.2MB
						Exhibits	Exhibit 1 & 2 to the Complaint	2.0MB
						Exhibits	Exhibits 3 to 6 of the Complaint	0.6MB
						Exhibits	Exhibit 7 to the complaint	3.2MB
						Exhibits	Exhibits 8 & 9 to the Complaint	0.3MB
65952290	9/22/2020 11:48 AM EDT	File Only	2020-0809-PWG Reactivate 11.09.2020 IFP Meghan Kelly v. Donald Trump, et al	Register in Chancery, DE Court of Chancery Civil Action	1	Complaint with 1 or 2 defendants	Complaint (Part 1 of 4)	11.5MB
					2	Supplemental Information Sheet	Supplemental Information Sheet	0.1MB
					3	Affidavit	Affidavit Application to Proceed In Forma Pauperis received 09.18.2020	0.5MB
						Order - Pauperis	Approved In Forma Pauperis Order signed by Master Griffin on 09.22.2020. Pay certain fees and costs namely copying costs for any copies in excess of one copy of every court filing.	0.1MB

1-37 of 37 transactions <<Prev Page 1 of 1 Next>>

APPENDIX 1-c

Printed on: 7/21/2021 13:29:40 GMT-0400 (Eastern Daylight Time)

[Click to Print](#)**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 falling 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) (eaf)	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)(eaf)	0.1MB

66667019	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					
66659299	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)(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) • Linked to (1)	0.2MB					
					66658984	6/4/2021 3:20 PM EDT	File Only	119,2021 Kelly, Meghan v. Donald Trump	Supreme Court Delaware, DE Supreme Court	28	Motion under Rule 14(d)	Motion under Rule 14(d) by appellant. (dja)	0.2MB
										29	Other	Appellant's declaration.	0.1MB
										30	Proposed Order	Proposed Order of motion. • Linked from (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	21	Motion - Other	Document entitled "Motion for recusal" filed by appellant. (283)(dja)	0.2MB
										22	Exhibit	Exhibit 1	0.1MB
										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										
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					

						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

	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 A

IN THE SUPREME COURT OF THE STATE OF DELAWARE

MEGHAN KELLY,	§
	§ No. 119, 2021
Plaintiff Below,	§
Appellant,	§ Court Below—Court of
	§ Chancery of the State of
v.	§ Delaware
	§
DONALD J. TRUMP,	§ C.A. No. 2020-0809-PWG
	§
Defendant Below, Appellee.	§

Submitted: June 8, 2021

Decided: July 7, 2021

Before VAUGHN, TRAYNOR, and MONTGOMERY-REEVES, Justices.

ORDER

After consideration of the opening brief and the record on appeal, it appears to the Court that:

(1) The appellant, Meghan Kelly, challenges a decision of the Court of Chancery overruling exceptions to a Master’s report that recommended dismissal of her complaint. For the reasons stated below, we affirm, *sua sponte*, the judgment of the Court of Chancery.¹

¹ See DEL. SUPR. CT. R. 25(c) (“After filing of the appellant’s opening brief, a panel of the Court by unanimous action may, *sua sponte*, enter an order or opinion affirming the judgment or order of the trial court for the reason that it is manifest on the face of the appellant’s opening brief that the appeal is without merit . . .”).

(2) In September 2020, Kelly initiated an action in the Court of Chancery against then-President Donald Trump. In the nearly 500-paragraph operative complaint, Kelly—who identifies as Catholic, a Democrat, and a “liberal Christian”—asserted three counts against Trump. Count I alleged that Trump “established the illusion of government sponsored or government backed religion or religious beliefs,” in violation of the First Amendment, including by “creating the appearance of supporting one perceived religious group,” “govern[ing] through the illusion of religious authority,” and accepting “religious and political support from alleged Christians.”² Count II alleged that Trump burdened Kelly’s free exercise of religion, in violation of the First Amendment and the Religious Freedom Restoration Act,³ by inciting “private citizens who believe supporting [Trump] supports God” to persecute Kelly for her beliefs.⁴ Count III alleged that Trump’s adoption of Executive Order 13798⁵ violated the First Amendment by “granting churches the

² *Kelly v. Trump*, C.A. No. 2020-0809-PWG, Amended Complaint ¶¶ 427-29 (Del. Ch.) (filed Oct. 5, 2020) [hereinafter Am. Compl.].

³ 42 U.S.C. § 2000bb-2000bb-4.

⁴ Am. Compl., *supra* note 2, ¶ 439.

⁵ *Promoting Free Speech and Religious Liberty*, Exec. Order No. 13798, 82 Fed. Reg. 21675 (May 4, 2017). Among other provisions, Executive Order 13798 provides that 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

ability to donate to politicians and political groups,” creating an “unholy union” between religious groups and politicians, and causing members of religious groups to persecute other members of their own group who, like Kelly, “do not align with the religious group’s political interests.”⁶ Kelly sought an order enjoining Trump from sponsoring religion or persecuting those with diverse religious beliefs while employed as president and a declaration that the First Amendment rights of government agents are more limited than the rights of ordinary citizens.⁷

(3) On November 2, 2020, a Master in Chancery issued a final report recommending dismissal of the complaint as legally frivolous under 10 *Del. C.* § 8803(c).⁸ The Master determined that Kelly lacked standing to pursue the claims that she asserted because Kelly had not shown that Trump’s conduct caused her an actual or concrete injury. Specifically, the Master determined that Kelly’s “contentions are too remote and vague to be actionable.”⁹ The Master also concluded that Kelly lacked standing because she had not shown that it was likely

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.” *Id.* § 2.

⁶ Am. Compl., *supra* note 2, ¶¶ 450, 466-67, 471.

⁷ Kelly purported to serve the complaint on then-President Trump by mailing it to then-Attorney General William Barr. We do not consider whether such mailing properly effected service, nor do we consider whether a president is subject to civil litigation in state court.

⁸ See 10 *Del. C.* 8803(c) (permitting a court to dismiss a complaint brought by a litigant who is proceeding *in forma pauperis* if the complaint is factually or legally frivolous or malicious). The court had previously granted Kelly’s application to proceed *in forma pauperis*.

⁹ *Kelly v. Trump*, 2020 WL 6392865, at *3 (Del. Ch. Nov. 2, 2020).

that the alleged injury, “including persecution and eternal harm,” would be redressed if the requested relief were granted.¹⁰

(4) A Vice Chancellor overruled Kelly’s exceptions to the Master’s report,¹¹ and Kelly has appealed. On appeal, Kelly argues that the Court of Chancery erred by dismissing her claims for lack of standing. She also asserts that she should be permitted to substitute President Joseph Biden for former President Trump as the defendant in this action.

(5) As an initial matter, we note that it does not appear that Kelly has served Trump, President Biden, or anyone else in this appeal. Kelly’s failure to perfect service, alone, is fatal to the appeal.¹²

(6) Also, as to Counts I and II, Kelly indicates that “Trump is no longer a Defendant in this action” and that she is not currently seeking any relief against Trump because he is no longer president.¹³ Instead, she states that she has appealed the Court of Chancery’s ruling “to preserve future or additional claims, with prejudice, against Trump related to his creation of government-religion and government-religious-beliefs, as capable of repetition to defeat res judicata, against him, for additional violations of the laws, should Trump be reelected as president.”¹⁴

¹⁰ *Id.*

¹¹ *Kelly v. Trump*, 2021 WL 1175423 (Del. Ch. Mar. 26, 2021).

¹² *See Dixon v. Delaware Olds, Inc.*, 396 A.2d 963, 966 (Del. 1978) (holding that failure to timely perfect service was “fatal” to the appeal).

¹³ Opening Brief at 2.

¹⁴ *Id.* at 2-3.

The Court of Chancery applied well-settled standing analysis to Kelly’s allegations in Count I and II regarding Trump’s conduct while in office and the harm it caused her.¹⁵ Kelly concedes that a future complaint, in the event that Trump were reelected and engaged in “additional violations of the laws,” would allege that future conduct caused future harm to Kelly. *Res judicata* would not bar those new claims.¹⁶ We therefore decline to render an advisory opinion regarding Counts I and II of the complaint.

(7) Regarding Count III, Kelly argues that she should be permitted, under Court of Chancery Rule 25, to substitute President Biden for former President Trump as the defendant in this action.¹⁷ In essence, she asserts that President Biden has allowed Executive Order 13798 to remain in effect; she claims that the executive order violates her First Amendment rights by creating excessive entanglement

¹⁵ *Kelly*, 2020 WL 6392865, at *3 (applying the requirements for standing set forth in, e.g., *Dover Historical Soc’y v. City of Dover Planning Comm’n*, 838 A.2d 1103, 1110-11 (Del. 2003)). See also *Kelly*, 2021 WL 1175423, at *2 (applying the same standard for standing).

¹⁶ See *LaPoint v. AmerisourceBergen Corp.*, 970 A.2d 185, 193-95 (Del. 2009) (explaining that *res judicata* does not bar claims based on facts that were not, and could not have been, known to a plaintiff during a prior action because they arose from events that had not yet occurred at the time of the prior action).

¹⁷ See DEL. CT. CH. R. 25(d)(1) (“When an officer of the State of Delaware, a county, city or other governmental agency is a party to an action in the officer’s official capacity and during its pendency dies, resigns, or otherwise ceases to hold office, the action does not abate and the officer’s successor is automatically substituted as a party. Proceedings following the substitution shall be in the name of the substituted party, but any misnomer not affecting the substantial rights of the parties shall be disregarded. An order of substitution may be entered at any time but the omission to enter such an order shall not affect the substitution.”). We need not opine on whether Court of Chancery Rule 25(d)(1) applies to officers of the federal government, nor, as noted *supra* note 7, on whether the president is subject to suit in the Delaware state courts.

between the government and religious organizations. Specifically, she contends that the executive order “require[s] government organizations and agents to partner with churches to pay churches to perform government business for the government, instead of government workers performing their own jobs.”¹⁸ She states that the “churches create the illusion of charity while serving business greed” and that she “believe[s] people will be damned to hell for thinking business greed is charity.”¹⁹ She asserts that, although she might be “eligible to receive federal[ly] funded assistance through churches,” she “chose not to sin against God by . . . seeking such federally funded aid[] administered through religious organizations” and thereby “misleading people to hell.”²⁰

(8) Kelly’s claim is manifestly without merit. Contrary to her assertion, Executive Order 13798, on its face, does not prescribe any partnership between the government and any religious organization. Thus, even if being caused to forgo government-funded services under these circumstances were a concrete injury for purposes of standing analysis, which we need not decide, Kelly has failed to state any cognizable claim concerning Executive Order 13798.

¹⁸ Opening Brief at 28-29.

¹⁹ *Id.* at 29.

²⁰ *Id.* at 30.

NOW, THEREFORE, IT IS ORDERED that the judgment of the Court of Chancery is AFFIRMED. The other pending motions are moot.

BY THE COURT:

/s/ Gary F. Traynor
Justice

APPENDIX B-1

IN THE SUPREME COURT OF THE STATE OF DELAWARE

Meghan Kelly,)	
)	No. 119, 2021
Plaintiff Below,)	
Appellant,)	
)	
v.)	
)	
Donald Trump, et. al.)	
)	
Defendant Below,)	
Appellee)	

APPELLANT’S UNOPPOSED MOTION FOR A REARGUMENT BEFORE THE DELAWARE SUPREME COURT

1. I, Meghan Kelly, pro se appellant, having been granted in forma pauperis relief, move the Delaware Supreme Court, unopposed, pursuant to *Delaware Supreme Court Rule 18*, for a reargument of this court’s Order decided July 7, 2021, submitted July 8, 2021 (“Order”) affirming the Chancery Court's judgments. Reargument, is necessary because:

1 The Panel overlooked the fact perfection of service, was not required, when there was time to cure any deficiencies, at the time the Chancery court halted service by withholding one subpoena for the amended complaint for the civil process clerk in the US District Attorney’s Office for the District of Delaware in response to my request for the same, dated October 5, 2020, and also at the time service of all Defendants was halted on November 2, 2021 with the Master’s ruling from which this appeal arises. Pursuant to *Federal Rule 4(m)*, federal agents must

be served within 60 days of the initial pleading. 19 days remained when the master halted service on November 2, 2021. The Delaware Superior Court held in *Marvel v. State*, 2014 Del. Super. LEXIS 638, *1, 2014 WL 7009516, “If the complaint is not frivolous, then service of process may be issued in order for the case to move forward.” *Del. Code Ann.* tit. 10, § 8803(c). Thus, I am prevented from serving any Defendant until a favorable final appellate determination is made concerning whether I have standing, and such service to cure defects in old complaints would be moot as a new amended complaint would be required with perfected service.

2. The Panel overlooked my argument the court itself through members, such as Judge Clark of the Court of Common Pleas, the arms of the Supreme Court, DE-LAPP, possibly the Chief Justice of this Supreme Court, Arline Simmons, and other staff sought to deprive me of the opportunity to be heard based on poverty, religious beliefs, association, speech or otherwise. The Court need not believe as I do, and it may personally deem my faith in Jesus crazy. Yet the Court must still protect my free exercise of religion, speech and association without disparate treatment against me based on my exercise of religious beliefs, speech, association or based on poverty, which they may not approve of, or none are free. All are forced to believe, speak and associate under government allowed doctrines.;

3. The Panel overlooked *Chancery Court Rule 25* (d) expressly permits the substitution of President Biden for President Trump, by specifically allowing replaced candidates in elections to be substituted for the ejected party. *Rule 25* permits me to seek to enjoin the establishment of government-religion by President Biden, the same relief I sought from President Trump. “(1) The requested substitution for (the Defendant) raises the same set of issues, enjoining Presidents from establishing government-religious beliefs, (2) Defendants had notice of the likely substitution.” Citing, *ClubCorp, Inc. v. Pinehurst, LLC*, No. CIV.A. 5120-VCP, 2011 WL 5554944, at *5 (Del. Ch. Nov. 15, 2011). Biden has notice of this potential substitution concerning the same substance of the complaint I filed against President Trump. (See, Docket 59-60 at 2-3, 26, 44, 56-57, 61-62). I also sent the Delaware US Attorney Generals Merrick Garland and David Weiss a copy of the notice of this appeal to this Court by US mail. I may only seek relief from the person in the position of President, not from Trump in his personal capacity, or his former capacity as President, and;

4. The Panel overlooked critical facts that would have changed the outcome of this appeal. A hearing is not fair if the court blinds its eyes and dumbs its ears to hearing all of the material presented by choosing not to read or hear it in toto, no matter how heinous the lengthy list of misconduct establishing government religion is, and the causal link, the direct harm to me but for the Presidents’

misconduct, and the relief that would afford me a remedy, personally, as a party of one. Part of the right to be heard, is to actually have our pleas for help heard before the court, not ignored and left unaddressed. Biden's enforcement of specific executive orders, other than one, and Trump's lengthy list of unconscionable behavior excessively entangling and establishing government religion was left undiscussed by all courts. Reargument is required to help the court see what is hard to look at, as even I desire to turn away instead of shedding light on such evil. All of the executive orders I mentioned in my brief to this honorable court sell our freedoms away by barter or exchange, under the guise of protecting the same. We are no longer free if freedom is for sale.

5. The Court draws its existence by the will of the people, not by cold hard cash supplied by entities, including religious entities, who take the blood, sweat and tears of people by killing, stealing and destroying their freedom in the form of free choice, to supply such cash from laborers, in a forced, not free market.

WHEREFORE, Meghan Kelly respectfully requests that the Court grant her Motion for Reargument.

July 12, 2021

Respectfully Submitted,

/s/ Meghan Kelly
Meghan Kelly
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
(919 Words)

APPENDIX B

IN THE SUPREME COURT OF THE STATE OF DELAWARE

MEGHAN KELLY,

Plaintiff Below,
Appellant,

v.

DONALD J. TRUMP,

Defendant Below, Appellee.

§

§ No. 119, 2021

§

§ Court Below—Court of
§ Chancery of the State of
§ Delaware

§

§ C.A. No. 2020-0809-PWG

§

§

Submitted: July 14, 2021

Decided: July 19, 2021

Before VAUGHN, TRAYNOR, and MONTGOMERY-REEVES, Justices.

ORDER

This 19th day of July, 2021, the Court has carefully considered the motion for reargument filed by appellant, and it appears that the motion is without merit and should be denied.

NOW, THEREFORE, IT IS ORDERED that the motion for reargument is DENIED.

BY THE COURT:

/s/ Gary F. Traynor
Justice

APPENDIX C-1

RE: Thank you/Defendant in receipt of order too?/Re: Meghan Kelly v Donald Trump 2020-0809-PWG.

From: McKinnon, Brenda (Courts) (brenda.mckinnon@delaware.gov)

To: meghankellyesq@yahoo.com

Date: Monday, April 19, 2021, 10:54 AM EDT

No, Ms. Kelly

Brenda G. McKinnon

Brenda.McKinnon@Delaware.gov

Case Manager II

Register In Chancery

For the Court of Chancery

In the Leonard L. Williams Justice Center

500 North King Street, Suite 11600

Wilmington, DE 19801

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From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Monday, April 19, 2021 10:27 AM
To: McKinnon, Brenda (Courts) <Brenda.McKinnon@delaware.gov>
Cc: Meg Kelly <meghankellyesq@yahoo.com>
Subject: Thank you/Defendant in receipt of order too?/Re: Meghan Kelly v Donald Trump 2020-0809-PWG.

Hi Ms. McKinnon,

Thank you so much for responding. No need to send a copy. I received the order.

Could you please let me know whether the Vice Chancellor sent any Defendant the order too. I do not believe he was required to do so.

Thank you,

Meg

On Monday, April 19, 2021, 10:10:53 AM EDT, McKinnon, Brenda (Courts) <brenda.mckinnon@delaware.gov> wrote:

Good Morning Ms. Meg Kelly,

The Court had sent out the order three times. Twice to the address we have on record and once through File and Serve Xpress. The address the court has for Meghan Kelly is 34012 Shawnee Drive, Dagsboro, Delaware 19939. This the address provided by you on court documents filed in your civil action. I can send an official copy out you, Please will provide an address for me to send by certified mail.

Brenda G. McKinnon

Brenda.McKinnon@Delaware.gov

Case Manager II

Register In Chancery

For the Court of Chancery

In the Leonard L. Williams Justice Center

500 North King Street, Suite 11600

Wilmington, DE 19801

Main 302.255.0544

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From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Monday, April 19, 2021 7:14 AM
To: McKinnon, Brenda (Courts) <Brenda.McKinnon@delaware.gov>
Cc: Meg Kelly <meghankellyesq@yahoo.com>
Subject: Meghan Kelly v Donald Trump 2020-0809-PWG.

Good morning Ms. McKinnon,

Could you please let me know whether the Honorable Vice Chancellor Paul A. Fioravanti, Jr. sent a copy of his May 26, 2020 Order to Donald Trump in case number 2020-0809-PWG.

I do not believe the Honorable Vice Chancellor was required to do so.

I just wanted to confirm on the side of precaution.

Thank you. Have a great day.

Best regards,

Meg Kelly

APPENDIX C



EFiled: Mar 26 2021 02:10PM EDT
Transaction ID 66459051
Case No. 2020-0809-PWG



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

MEGHAN KELLY,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 2020-0809-PWG
)	
DONALD J. TRUMP,)	
)	
Defendant.)	
_____)	

**ORDER OVERRULING EXCEPTIONS
TO MASTER’S FINAL REPORT**

WHEREAS,

A. On September 22, 2020, Plaintiff Meghan Kelly (“Kelly”) filed a complaint against Defendant Donald Trump (“Trump”) in his individual capacity and in his official capacity as President of the United States.

B. On October 5, 2020, Kelly filed her first amended complaint. The amended complaint contains three counts alleging that Trump has violated Kelly’s religious freedom. Count I alleges that Trump, in his official capacity as President, has engaged in the unlawful establishment of government religion in violation of the Establishment Clause of the First Amendment “applicable to Defendant via the [Fifth Amendment].” Am. Compl. ¶¶ 425–434. Count II alleges that Trump has substantially burdened Kelly’s free exercise of religion in violation of 42 U.S.C. §§ 2000bb–2000bb-4 and the First Amendment “applicable to Defendant via the [Fifth]



Amendment.” *Id.* ¶¶ 436–446. Count III alleges that Trump’s Executive Order 13798 violates the Establishment Clause of the First Amendment “applicable to Defendant via the [Fifth] Amendment.” *Id.* ¶¶ 448–478.¹

C. Plaintiff seeks: (1) relief permanently enjoining and restraining Trump from forcing religious views or sponsoring religion and from persecuting those with diverse religious beliefs, while he serves as President of the United States, (2) declaratory relief ordering federal government agents, such as Trump, acting under the cloak of federal government authority, to uphold, and not chill, constitutional freedoms, and (3) costs.

D. On October 12, 2020, Kelly filed a second motion to amend the complaint.

E. Kelly’s main theory of her case is that Trump creates the illusion of being a devout Christian, while engaging in acts that Kelly contends are against the main tenets of Christianity. She claims that his actions substantially burden and injure her “free exercise of religion” causing her “eternal harm” and “chilling [her] free exercise of religion by [his] increased threat of government sponsored religious persecution and, or the actual government sponsored persecution for [her] attempts to freely exercise [her] religion.” Am. Compl. ¶ 14. Kelly alleges that, through

¹ Exec. Order No. 13798, 82 C.F.R. § 21675 (2017).



Trump's deception, he is misleading people, deceiving them to sin, and dooming them to hell. The primary harm Kelly claims is that, because Trump is leading people to hell, Kelly will not be able to love them for eternity. She also alleges that she is persecuted, and her religious belief chilled, because of Trump's support for one religious belief, and suppression of others, which substantially burdens her freedom to exercise her faith.

F. On November 2, 2020, the Master issued a Final Report recommending dismissal of the Amended Complaint on the grounds that Kelly lacked standing and, therefore, the Amended Complaint was legally frivolous. Dkt. 46.

G. Kelly timely filed Exceptions to the Final Report. Dkt. 47.

H. On December 5, 2020, Plaintiff filed a supporting brief, with dozens of exhibits in support of her Exceptions, which were docketed on January 6, 2021. Dkt. 59–94.

I. On November 9, 2020, the Chancellor assigned this matter to the undersigned for the purpose of hearing the Exceptions to the Master's Final Report. Dkt. 49.

IT IS HEREBY ORDERED, this 26th day of March, 2021:

1. The standard of review for a Master's findings, both as to law and fact, is *de novo*. *DiGiacobbe v. Sestak*, 743 A.2d 180, 184 (Del. 1999).



2. The Court has carefully reviewed the record and has determined that it is possible to conduct a *de novo* review without conducting an evidentiary hearing. *See id.* The Exceptions do not turn on dispositive credibility determinations that would require the Court to view witnesses.

3. The Master correctly resolved this matter on grounds of standing. Plaintiff has the burden of demonstrating that she has standing. *Vichi v. Koninklijke Philips Elecs. N.V.*, 62 A.3d 26, 38 (Del. Ch. 2012). To have standing, “(1) [The plaintiff must have] . . . suffered an injury in fact—an invasion of a legally protected interest which is (a) concrete and particularized and (b) actual or imminent, not conjectural or hypothetical; (2) there must be a causal connection between the injury and the conduct complained of [;] the injury has to be fairly traceable to the challenged action of the [respondent] and not the result of the independent action of some third party not before the court; and (3) it must be likely, as opposed to merely speculative, that the injury will be redressed by a favorable decision.” *Id.*

4. The Master concluded that Plaintiff failed to establish an actual or concrete injury caused by Trump’s conduct. Final Report at 6–8.

5. In her brief in support of her Exceptions, Plaintiff recites her deep commitment to her Christian faith and her disdain for actions and words of Mr. Trump while in office. Although she takes issue with some of the Master’s factual



recitation as mischaracterizing some of Plaintiff's beliefs, Plaintiff does not demonstrate that she has standing. *See, e.g.*, Pl.'s Br. 23 ("I do not allege Trump creates the appearance of being 'a devout Christian' as the Honorable Master opined. I allege [Trump] creates the illusion of having the support of God . . . or creating the illusion that supporting Trump supports God or my religion, Christianity, and, or inversely, not supporting him somehow suppresses my own religion or makes me . . . not a Christian."). For example, the general allegation that "strangers stop interacting with me concerning God, when they discover I am a democrat" falls far short of what is necessary to assert a concrete injury that is caused by defendant. Pl.'s Br. 40.²

6. Having reviewed the matter carefully, and "[b]elieving the Master to have dealt with the issues in a proper manner and having articulated the reasons for her decision well, there is no need for me to repeat her analysis." *In re Estate of Erdman*, 2011 WL 2191680, at *1 (Del. Ch. May 26, 2011); *see also Tinley v. Pleasanton*, 791 A.2d 751, at *1 (Del. 2002) (ORDER) ("The Court has determined that the judgment of the Court of Chancery should be affirmed on the basis of, and for the reasons set forth in, the Master's well-reasoned report dated May 16, 2001,

² Plaintiff alleges that Executive Order 13798 "allows religious groups to buy favors or loyalty through donations to those in power or those seeking government power" (Am. Compl. ¶ 452), but does not allege how the Executive Order causes any concrete injury to her. *See, e.g., id.* ¶ 471 ("My free exercise has been in effect substantially burdened by the application of the executive order.").



as adopted by the Court of Chancery on September 13, 2001.”); *Mennen v. Wilmington Trust Co.*, 2017 WL 751201, at *2 (Del. Ch. Feb. 27, 2017) (denying exceptions to Master’s ruling, stating: “I would like to think that I could improve on then-Master LeGrow’s decision, but I know that I cannot.”). Accordingly, I adopt the Master’s analysis and recommendation to dismiss the amended complaint and to deny Plaintiff’s second motion to amend the complaint as moot.³

7. The Exceptions to the Final Report are overruled.

IT IS SO ORDERED.

/s/ Paul A. Fioravanti, Jr.
Vice Chancellor

³ Plaintiff recognizes that some of her claims might become moot upon the termination of Mr. Trump’s Presidential term. Pl.’s Br. 61. Plaintiff argues that her claims are subject to the well-recognized exception to the mootness doctrine for claims that are capable of repetition, yet evading review. *Id.* at 62 (citing *United States v. Sanchez-Gomez*, 138 S. Ct. 1532 (2018)). To qualify under that exception, the challenged action must be too short in duration to be fully litigated prior to cessation or expiration and there is a reasonable expectation that the same complaining party will be subjected to the same action again. *Sanchez-Gomez*, 138 S. Ct. at 1540. Having concluded Plaintiff lacks standing, the court need not reach the issue of an exception to the mootness doctrine. Nevertheless, Plaintiff’s assertion that “there is an expectation that [she] will be subjected to the same action again, albeit by a different President,” Pl.’s Br. 62, is mere conjecture that would not support an exception to the mootness doctrine. *See Underwood v. United States*, 255 Fed. Appx. 337, 338 (10th Cir. 2007) (Order) (“To invoke the exception to mootness, however, plaintiff must do more than speculate about future possibilities. She must show a reasonable expectation or a demonstrated probability that this same controversy, involving herself and the government, will recur.” (internal quotations omitted)).

APPENDIX D

EFiled: Nov 02 2020 01:33PM EST
Transaction ID 66072815
Case No. 2020-0809-PWG



**COURT OF CHANCERY
OF THE
STATE OF DELAWARE**

PATRICIA W. GRIFFIN
MASTER IN CHANCERY

CHANCERY COURTHOUSE
34 The Circle
GEORGETOWN, DELAWARE 19947

Final Report: November 2, 2020

Via U.S. Mail

Meghan Kelly
34012 Shawnee Drive
Dagsboro, Delaware 19939

Re: *Meghan Kelly v. Donald Trump, et al.*
C.A. No. 2020-0809-PWG

Dear Ms. Kelly:

Pending before me is your complaint claiming Donald J. Trump, President of the United States, has violated your religious freedom. This complaint, while undoubtedly sincere, must be dismissed as legally frivolous under 10 *Del. C.* §8803(c). This is a final report.

I. BACKGROUND

On September 22, 2020, Plaintiff Meghan Kelly (“Kelly”) filed a complaint against Defendant Donald Trump (“Trump”) in his individual capacity and in his official capacity as President of the United States.¹ On October 5, 2020, Kelly

¹ Docket Item (“D.I.”) 1; D.I. 4; D.I. 5. On September 22, 2020, Kelly filed an application to proceed *in forma pauperis*, which was approved the same day. D.I. 3. Kelly also filed a Motion for a Temporary Restraining Order seeking to prohibit Trump from supporting one perceived religion and from persecuting those with diverse religious beliefs, a Motion to Expedite, and a memorandum of law in support of those motions. D.I. 6; D.I. 7; D.I. 8.

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C.A. No. 2020-0809-PWG

November 2, 2020

filed her first amended complaint.² Under Court of Chancery Rule 15(a), a party may amend their complaint once, as a matter of course, before a responsive pleading is filed.³ In her amended complaint, Kelly brought three counts alleging that Trump has violated her religious freedom.⁴ Count I alleges that Trump, in his official capacity as President, has engaged in the unlawful establishment of government religion in violation of the Establishment Clause of the First Amendment “applicable to Defendant via the [Fifth Amendment].”⁵ Count II alleges that Trump has substantially burdened Kelly’s free exercise of religion in violation of 42 U.S.C. §§ 2000bb - 2000bb-4 and the First Amendment “applicable to Defendant via the [Fifth] Amendment.”⁶ Count III alleges that Trump’s Executive Order 13798 violates the Establishment Clause of the First Amendment “applicable to Defendant via the [Fifth] Amendment.”⁷ Kelly seeks (1) relief permanently enjoining and restraining Trump from forcing religious views or sponsoring religion and from persecuting those with diverse religious beliefs, while

² D.I. 18; D.I. 19. The original complaint sued Trump in both his individual and governmental capacities. The first amendment removes Trump as a defendant in his individual capacity, and refers to the Defendant as the President of the United States in case Trump is no longer in office. D.I. 16.

³ Ct. Ch. R. 15(a).

⁴ D.I. 19, ¶¶ 425-78.

⁵ Id., ¶¶ 425-434.

⁶ Id., ¶¶ 436-446.

⁷ Id., ¶¶ 448-478; Exec. Order. No. 13798, 82 C.F.R. § 21675 (2017).

Meghan Kelly v. Donald Trump, et al.

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November 2, 2020

he serves as President of the United States, (2) declaratory relief ordering federal government agents, such as Trump, acting under the cloak of federal government authority, to uphold, and not chill, constitutional freedoms, and (3) costs.⁸ On October 12, 2020, Kelly filed a second motion to amend the complaint.⁹

II. ANALYSIS

Kelly's main theory of her case is that Trump creates the illusion of being a devout Christian, while engaging in acts that Kelly contends are against the main tenets of Christianity.¹⁰ She claims that his actions substantially burden and injure her "free exercise of religion" causing her "eternal harm" and "chilling [her] free exercise of religion by [his] increased threat of government sponsored religious persecution and, or the actual government sponsored persecution for [her] attempts to freely exercise [her] religion."¹¹ Kelly alleges that, through Trump's deception, he is misleading people, deceiving them to sin, and dooming them to hell.¹² The primary harm Kelly claims is that, because Trump is leading people to hell, Kelly will not be able to love them for eternity.¹³ She also alleges that she is persecuted,

⁸ Id., Prayer for Relief.

⁹ D.I. 26; D.I. 27. Kelly filed a corrected second motion to amend on October 13, 2020. D.I. 33; D.I. 34. In the second motion to amend the complaint, Kelly seeks to add the United States as a necessary party. D.I. 34; D.I. 27.

¹⁰ D.I. 18; D.I. 19.

¹¹ D.I. 18, ¶ 14.

¹² See, e.g., id., ¶¶ 12, 17, 130-133; D.I. 19, ¶¶ 441, 475.

¹³ See, e.g., D.I. 18, ¶¶ 15-21; D.I. 19, ¶¶ 297, 438.

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and her religious belief chilled, because of Trump's support for one religious belief, and suppression of others, which substantially burdens her freedom to exercise her faith.¹⁴

In cases in which an individual is proceeding *in forma pauperis*, if “the Court determines the complaint is faulty because it is legally frivolous, malicious or factually frivolous, then the Court dismisses it.”¹⁵ Even where the court does not dismiss a complaint initially, if “the record subsequently reveals the action is factually frivolous, malicious or the action is legally frivolous . . . the court may upon its own motion or the motion of a party, enter judgment against plaintiff and dismiss the complaint.”¹⁶ A complaint is legally frivolous when it “fails to state a claim upon which relief may be granted.”¹⁷

¹⁴ See, e.g., D.I. 19, ¶¶ 364, 367, 368, 439, 440.

¹⁵ *Cannon v. McCreanor*, 2003 WL 943247, at *2 (Del. Super. Mar. 6, 2003); see also *Biggins v. Biden*, 2010 WL 3496838, at *2 (Del. Super. Sept. 8, 2010), *aff'd*, 9 A.3d (Del. 2010).

¹⁶ 10 *Del. C.* § 8803(c); see also *Allen v. Coupe*, 2016 WL 676041, at *2 (Del. Super. Feb. 18, 2016) (“If the Court does not dismiss a petition initially, but later finds that it is factually or legally frivolous or malicious, the Court also may dismiss the petition.”). A legally frivolous claim is “based on an indisputably meritless legal theory.” *Evans v. Coupe*, 2016 WL 1608489, at *1 (Del. Super. Apr. 20, 2016), *aff'd*, 147 A.3d 234 (Del. 2016) (citations omitted); *Hall v. Hudson*, 2005 WL 2249559, at *1 (Del. Super. June 16, 2005), *aff'd*, 889 A.2d 283 (Del. 2006). Factually frivolous claims are “allegations that are baseless, of little or no weight, value or importance, not worthy of serious attention, or trivial.” *Hall*, 2005 WL 2249559, at *1. See generally *Neitzke v. Williams*, 490 U.S. 319, 325 (1989) (“[a] complaint containing both factual allegations and legal conclusions is frivolous where it lacks an arguable basis either in law or in fact . . . ‘frivolous,’ when applied to a complaint, embraces not only the inarguable legal conclusion, but also the fanciful factual allegation”).

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C.A. No. 2020-0809-PWG
November 2, 2020

In *Cannon v. McCreanor*, an inmate filed a complaint *in forma pauperis* alleging that the defendant refused to allow him to enter the dining hall.¹⁸ The *Cannon* Court held that the complaint was legally frivolous because the plaintiff provided “no justification or facts supporting his damage claims.”¹⁹ It found Cannon alleged “no specific damages and his claim is clearly frivolous,” reasoning that “if this type of claim does not fall under the definition of a ‘legally frivolous’ claim, I do not see how any claim could meet the definition.”²⁰

Prior to looking at the substance of a complaint, the Court must first determine whether the plaintiff has “pled facts from which it may reasonably be inferred that they have standing to bring their claims.”²¹ The issue of standing does not go to the “merits of the subject matter of the controversy,” but is concerned “only with the question of *who* is entitled to mount a legal challenge.”²² “[T]o obtain relief a party must have a legally cognizable interest in a controversy.”²³ If a plaintiff does not have standing, the court cannot grant relief

¹⁷ *Cannon*, 2003 WL 943247, at *2.

¹⁸ *Id.*, at *2.

¹⁹ *Id.*

²⁰ *Id.*

²¹ *Hall v. Coupe*, 2016 WL 3094406, at *3 (Del. Ch. May 25, 2016).

²² *Spiro v. Vions Tech. Inc.*, 2014 WL 1245032, at *8 (Del. Ch. Mar. 24, 2014) (citing *Stuart Kingston, Inc. v. Robinson*, 596 A.2d 1378, 1382 (Del. 1991)); see also *In re Jones*, 2006 WL 2035714, at *4 (Del. Ch. July 13, 2006) (citation omitted).

²³ *In re Jones*, 2006 WL 2035714, at *4 (citations omitted).

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November 2, 2020

to that plaintiff and the complaint fails to state a claim upon which relief may be granted.²⁴ “Standing is a threshold question, and, because standing is jurisdictional in nature, the Court may raise it *sua sponte*.”²⁵

To establish standing, “(1) the plaintiff must have suffered an injury in fact – an invasion of a legally protected interest which is (a) concrete and particularized and (b) actual or imminent, not conjectural or hypothetical; (2) there must be a causal connection between the injury and the conduct complained of – the injury has to be fairly traceable to the challenged action of the defendant . . . and (3) it must be likely, as opposed to merely speculative, that the injury will be redressed by a favorable decision.”²⁶ The harm must be concrete and particularized, and must have affected the plaintiff personally.²⁷

²⁴ See generally *Appriva S’holder Litig. Co., LLC v. EV3, Inc.*, 937 A.2d 1275, 1285 (Del. 2007).

²⁵ *In re Pantalone*, 2011 WL 6357794, at *2 (Del. Ch. Dec. 9, 2011) (citing *Thornton v. Bernard Techs., Inc.*, 2009 WL 426179, at *4 (Del. Ch. Feb. 20, 2009)); see also *In re Friends of Sandbar Vill. v. Sandcap, LLC, et al.*, 2019 WL 2024380, at *1, n. 1 (Del. Ch. May 8, 2019).

²⁶ *Dover Historical Soc’y v. City of Dover Planning Comm’n*, 838 A.2d 1103, 1110 (Del. 2003) (citations omitted); see also *Thornton*, 2009 WL 426179, at *4; *In re Jones*, 2006 WL 2035714, at *4.

²⁷ *Lujan v. Defs. of Wildlife*, 504 U.S. 555, 560, n. 1 (1992) (“By particularized, we mean that the injury must affect the plaintiff in a personal and individual way.”); see generally *Streifihau v. Bayhealth Med. Ctr.*, 2019 WL 1308267, at *3 (Del. Super. Mar. 21, 2019) (“[Delaware] Supreme Court has recognized the standing requirements set forth in *Lujan v. Defenders of Wildlife* as generally the same for Delaware state courts”); *Stuart Kingston, Inc. v. Robinson*, 596 A.2d 1378, 1382 (Del. 1991) (“to achieve standing, the plaintiff’s interest in the controversy must be distinguishable from the interest shared by other members of a class or the public in general”).

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November 2, 2020

I consider whether this complaint should be dismissed as legally frivolous under 10 *Del. C.* § 8803(c). The question centers on whether Kelly has standing to bring her claims; if she does not, she has failed to state a claim upon which relief can be granted and the complaint is dismissed as legally frivolous. Kelly has standing to bring her claims if she proves an injury, that the injury was caused by the allegedly wrongful conduct and that it is likely to be remedied by a favorable decision. Kelly fails to meet the first two elements of standing because she has not shown an actual or concrete injury to her caused by Trump's conduct. She claims to be persecuted by private citizens for her criticism of Trump's support of one religious belief, and suppression of others, substantially burdening her freedom to exercise religion.²⁸ She also alleges she will suffer eternal harm because "she will not be able to share a fuller type of love with the people [Trump] misleads to hell," who "will cease to exist."²⁹ She does not show Trump's actions have caused harm to her personally. Her contentions are too remote and vague to be actionable. She

²⁸ D.I. 19, ¶¶ 439, 440. I have no basis to infer a causal connection between Trump's actions and the persecution, since the alleged persecution was inflicted by persons other than Trump in response to Kelly's actions criticizing Trump.

²⁹ D.I. 18, ¶¶ 18, 19. Her claim that she will suffer eternal harm by her inability to have relationships with people if Trump's actions cause people (including acquaintances/friends she mentions in her complaint) to go to hell is not a sufficiently concrete injury. It is impossible for this Court to determine what happens to people after they die and under what circumstances a person goes to hell. That determination is appropriately left to a higher power.

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has also failed to show it is likely the injury she alleges, including persecution and eternal harm, will be redressed if her relief is granted.

It is clear that Kelly has strong religious beliefs and is sincere in her convictions. However, this Court cannot grant the relief she desires. Kelly lacks standing to bring this action because she has not alleged a personal, concrete and particularized harm, or damages, resulting from Trump's actions, and has not shown that a decision in her favor is likely to remedy the harm. Accordingly, the complaint fails to state a claim upon which relief may be granted and is legally frivolous.

III. CONCLUSION

Based upon the reasons set forth above, I recommend the Court dismiss the complaint under 10 *Del. C.* § 8803(c) as legally frivolous.³⁰ This is a final report and exceptions may be taken under Court of Chancery Rule 144.

Respectfully,

/s/ Patricia W. Griffin

Patricia W. Griffin
Master in Chancery

³⁰ With the amended complaint's dismissal, Kelly's second motion to amend the complaint (which would not alter the decision to dismiss the complaint as legally frivolous), and her other outstanding motions, become moot and do not need to be addressed.

APPENDIX E

IN THE SUPREMECOURT OF THE STATE OF DELAWARE

Meghan Kelly,)

)

Case No 119, 2021

Plaintiff)

v.)

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 United States)

Defendant.)

**APPELLANT’S OPENING BRIEF IN OPPOSITION TO THE
HONORABLE VICE CHANCELLOR PAUL A. FIORAVANTI, JR.’S
CHANCERY COURT ORDER OVERRULING EXCEPTIONS TO
MASTER’S FINAL REPORT**

Dated: June 8, 2021

Respectfully submitted,

/s/ Meghan Kelly

Meghan Kelly

34012 Shawnee Drive

Dagsboro, DE 19939

Bar Number 4968

Pro Se, not acting as an
attorney, I am a party

(Word Count 9,517)

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.....17

2. **Scope of review:** The standard of review of the Delaware Supreme Court for The Vice Chancellor’s findings as to both as to law and fact, is de novo “when deciding legal or constitutional questions.” *Citing, Ploof v. State*, 75 A.3d

811 (Del. 2013), as corrected (Aug. 15, 2013)..... 17

3. **Merits of the Arguments:** I met the burden of standing to preserve potential future additional claims, with prejudice, against Trump, to defeat res judicata should future possible claims arise, by “establish(ing) an actual, concrete injury (to me), caused (but for) Trump's conduct,” related to his creation of government-religion and government-religious-beliefs, as capable of repetition but evading review. Accordingly, the Court must not dismiss such claims without prejudice, at this time.17-25

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1. Questions Presented: Whether Meghan Kelly should be granted permission to file a motion to substitute President Biden for President Trump in an attempt to continue this case to safeguard her fundamental freedom of free exercise of religion, speech and association from substantial government burdens, in the Chancery Court below, as meeting the burden of standing.....26-27

A. First, is there an injury? Does President Biden’s enforcement of the Executive orders and E.O. 13798 run afoul of the prescribed tests for violation of the Establishment Clause of the Federal Constitution by establishing government-religion and government religious beliefs? U.S. Cons. Amend. 1.....26

B. Second could President Biden’s enforcement of the Executive orders and E.O. 13798, constitute excessive entanglement? Dkt 59-60.....26

C. Third, if so, does the President’s excessive entanglement by action or inaction constitute a legally recognizable burden on my Constitutional right to freely exercise my religion?.....26

D. Fourth, if my right to freely exercise my religion is legally burdened, is such burden justified by a compelling State interest?.....26

E. Fifth, would the relief requested alleviate my burden?.....26

F. Whether the Court may deny my access to the courts to address my fundamental rights.....27

2. **Scope of review:** The standard of review of the Delaware Supreme Court for The Vice Chancellor’s findings as to both as to law and fact, is de novo “when deciding legal or constitutional questions.” *Citing, Ploof v. State*, 75 A.3d 811 (Del. 2013), as corrected (Aug. 15, 2013).....26

3. **Merits of the Arguments:** I must be granted permission to file a motion to substitute President Biden for President Trump, under *Chancery Court Rule 25*, in an attempt to continue this case, in the Chancery Court below, as she met the

burden of proof for standing, *inter alias*, requiring she forgo a government. service or violate her religious beliefs. The Court must not deny my access to the courts to safeguard free exercise of my fundamental rights from unconstitutional burdens.....27-40

A. There is a Constitutional injury. President Biden’s enforcement of the E.O. 13798 and Executive orders run afoul of the prescribed tests for violation of the Establishment Clause of the Federal Constitution by establishing government-religion and government religious beliefs.....27-33

B. The conduct I refer to herein, the continued enforcement of E.O 13798 and the Executive Orders by Biden, constitute excessive entanglement by establishing government-religious associations and beliefs, by the partnered paid, not for, but for sale, union of church and state.....33

C. Biden’s establishment of government-religion by enforcement of E.O 13798 and the Executives Orders, but for, substantially burdens my free exercise of religion, speech and association in violation of *Religious Freedom Restoration Act*, 42 USCS §§ 2000bb et seq. (“RFRA”), and the Equal Protections component of the Fifth Amendment applicable to Biden.

I am individually injured, but for the President’s conduct establishing government-religion, as a class of one, based on perceived or projected religious-affiliation, as a democrat, Christian, Catholic, uniquely me, with me personally religious beliefs.....33-37

D. Fourth, given my right to freely exercise my religion is legally burdened, such burden is not justified by a compelling State interest.....37-38

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III. NATURE OF PROCEEDING

I initiated this case relating to constitutional claims, pro se, having been granted leave to proceed in forma pauperis.¹ I respectfully seek to preserve a claim of potential relief against President Trump (“Trump”), in his official capacity, not in his individual capacity at this time, should he be reelected as President of the United States.² I also respectfully seek to continue this law suit by presenting a motion to the Chancery Court to substitute Trump with President Biden (“Biden”), under *Chancery Court Rule 25*. See, Dkt 59-60 3, 5. at 2-3, 26, 44, 56-57, 59-62.

On November 2, 2020, the Master issued a Final Report recommending dismissal of this case on the grounds that I lacked standing and, therefore, this case was legally frivolous. Dkt. 46. I timely appealed, on or about December 5, 2020, by briefing exceptions of the Master’s Final Report to the Chancery Court,

¹ Docket (“Dkt”) Dkt 1, 3.

² Dkt 51. Cf. *Tanzin v. Tanvir*, 141 S. Ct. 486, 208 L. Ed. 2d 295 (2020). After submission of my appeal below, the Supreme Court held RFRA claims may be brought against federal, and in dicta state and local, government employees, and agents, non-employees, for money damages in their personal capacity, for substantially burdening free exercise of religion, removing government immunity by the express provisions of the statute opening the door for even churches to be sued as government agents, performing government duties. *Id.* I have not wrapped my head around this as it relates to Trump and Biden. I am in shock as the foreseeable influence this opinion may have for good or evil.

including arguments relating to the fact the Constitutional injury to me is capable of repetition, by Trump and Biden.³ Dkt 59-50 at 56-62.

On January 20, 2021, Defendant Trump was removed as President and replaced by President Biden. President Trump is no longer a Defendant in this action. I sought to sue him in his official capacity as president, not in his individual capacity. Dkt 56.

On March 26, 2021, the Vice Chancellor overruled my exceptions to Master's final report and affirmed the Master's ruling on grounds of standing. Dkt 95 at 2. The Vice Chancellor specifically affirmed Master's conclusion that I "failed to establish an actual or concrete injury caused by Trump's conduct." Id.

I filed this appeal to bear the burden of standing, to preserve future or additional claims, with prejudice, against Trump related to his creation of government-religion and government-religious-beliefs, as capable of repetition to

³ The staff at the honorable Chancery Court had difficulty due to reduced staff and unusual circumstances related to the pandemic. The Master kindly granted me an accommodation to file the appeal by allowing me to drop off a copy. Dkt 55. I responded with shock, and gratitude, since I am not used to receiving help when I ask those in authority out of need. Dkt. 58. I drafted a letter requesting that the Vice Chancellor please grant staff additional time to file my appeal, waiving my right for immediate relief, which explains the time lapse between my appeal on December 5, 2020, and the order, March 26, 2021. Dkt 56.

defeat res judicata, against him, for additional violations of the laws, should Trump be reelected as president. Dkt 1., 2, 3, 4, 8, 9, 60-90.

Secondly, I filed this appeal, to seek permission to continue my lawsuit by substituting parties to remove Trump to replace Defendant with President Biden, include nominal damages, and argue facts to bear the burden of standing against President Biden. Dkt 60, See the Notice of this appeal at Supreme Court Docket (“S Dkt”) 1.

IV. SUMMARY OF ARGUMENT

I met the burden of standing, by “establish(ing) an actual, concrete injury (to me) caused (but for) Trump's conduct” to preserve future and additional claims, with prejudice, against Trump related to his creation of government-religion and government-religious-beliefs, as capable of repetition but evading review, to defeat res judicata, against him, for additional violations of the laws argued in my brief below, and herein, incorporated herein fully, should Trump be reelected as President. Dkt 59-60, Dkt 95, at footnote 3.

President Trump’s conduct creating government-religion caused the actual, particularized, concrete harm to me personally by, but for, inciting a segment of the population to foreseeably demonize me, by demonizing Trump’s projection of my identifying religious-political associations, causing physical and social harm, and substantially burdening my free exercise of religion, speech, association under the threat of government incited persecution to me.

Meghan Kelly should be granted permission to file a motion to substitute President Biden for President Trump, under *Chancery Court Rule 25*, in an attempt to continue this case, in the Chancery Court below, as she met the burden of proof for standing, *inter alias*, requiring she forgo a government service or violate her religious beliefs. The Court must not deny my access to the courts to safeguard free exercise of her fundamental rights from substantial unconstitutional burdens.

V. STATEMENT OF FACTS

This case arises as a result of President Trump's use of religion for his own vanity, meaning using religion in vain, using religion for his governing purpose, creating government-religion and government-religious-beliefs, in violation of the Establishment clause of the first amendment of the US Constitution, the Due process component of the fifth amendment, and RFRA, substantially burdening my free exercise of religion, association and speech, by reasonable foreseeable infliction of emotional distress, logically manifesting in physical symptoms, such establishment of government-religion creates, and threat of physical harm and actual physical harm foreseeably incited, but for the President's conduct in establishing government-religion, while performing the government function of presiding over the United States of America, as the President of the United States. *U.S. Cons. Amend. 1, U.S. Const. Amend. V.*

Trump established a bought, or bartered for, not free, union of government-religion and government-religious beliefs, directly causing, continuous, ongoing government sponsored suppression of my free exercise of religion, speech and association under the threat of government sponsored, aka government incited persecution towards me individually, by third parties, but for caused by Government representative, President Trump's religious communications and conduct, under the color of the law, and passage and continued enforcement of

Executive Order No. 13798 (“E.O. 13798”), establishing government-party religions and government-religious-beliefs.

E.O. 13798 allows religious organizations, through churches, temples, mosques or other entities to back government parties or government agents or potential government agents with money, donations, support or otherwise, creating the appearance government parties or government employees are backed by God.

Thus, E.O. 13798 also allows government agents or potential government agents, candidates, to selfishly accept perceived support, or donations from representatives of God or religion through religious-entities, creating the government-religious-belief such people or parties are backed by God, by God’s representatives, in their role as government agents or potential government agents.

In a course of conduct, collectively referred to herein as an “unholy-union” of “government-religion,” I outlined in my brief below, pointing to exhibits, incorporated herein by reference in toto, Defendant Trump created the illusion of being backed by God, by receiving financial and, or religious-political support or the illusion of support by churches and religious organizations which represent a deity, the will of God, churches, while demonizing Democrats like myself as anti-God, anti-church, and anti-Bible, while acting under “the color of the law.”⁴

⁴ Citing and incorporating by reference in toto, *Plaintiff Meghan Kelly’s Brief in Support of her Exception to Special Master’s Final report*, Dkt 59-60, and the

Trump used government-religious backing, exploiting the belief he is anointed by God, to teach what I believe is sin is good and Godly, including but not limited to, the sin of using violence, and attacking fellow Americans as the enemy instead of people with different perspectives, foreseeably inciting actual and very real threat of potential violence against me and other perceived dissidents to his manufactured government-religion based on the mark of beast, business greed, not love, as outlined in my brief and exhibits thereto, incorporated herein in toto,

Exhibits attached to Plaintiffs Briefs incorporated therein by reference as part of the Brief, Exhibit A. part 1 of 2, *Meghan Kelly v Trump*, initial complaint, Dkt 60, Exhibit A, part 2 of 2, *Meghan Kelly v Trump*, initial complaint, Dkt 60; Exhibit B-Exhibit 1, Dkt 60; Exhibit B-Exhibit 2, Plaintiff's Complaint against the Defendant Democratic Party, et al, in the Chancery Court for the State of Delaware based on requiring I disobey Jesus to run for office, Case Number 2020-0517, Dkt 60, Exhibit B-Exhibit 3, Dkt 60; Exhibit B-Exhibit 4, Dkt 60; Exhibit B, Exhibit 5, Dkt 60; Exhibit B, Exhibit 6, Dkt 60; Exhibit B, Exhibit 7, Dkt 60; Exhibit B, Exhibit 8, Dkt 63; Exhibit B-Exhibit 9, Dkt 63; Exhibit E-Exhibit 10, Dkt 63, Exhibit E-Exhibit 11, Dkt 63; Exhibit E-Exhibit 12, Dkt 63; Exhibit E-Exhibit 13, Article, Dkt 63. Exhibit E-Exhibit 16, Dkt 63; Dkt 63; Exhibit E-Exhibit 18, Dkt 63; Exhibit E-Exhibit 19, Dkt 63; Exhibit E-Exhibit 20, Dkt 61; Exhibit E-Exhibit 21, Dkt 62; Exhibit E-Exhibit 22, Dkt 63; Exhibit E-Exhibit 23, Dkt 64; Exhibit E-Exhibit 24, Dkt 71; Exhibit E-Exhibit, Dkt 71; Exhibit E-Exhibit 26, Dkt 71; Exhibit E-Exhibit 27, Dkt 71, Exhibit E-Exhibit 28, article, Dkt 71; Exhibit E-Exhibit 29, Dkt 71; Exhibit E-Exhibit 30, Dkt 71; Exhibit E-Exhibit 31, Dkt 65; Exhibit E-Exhibit 32, Dkt 66; Exhibit E-Exhibit 33, Dkt 67; Exhibit E-Exhibit 34, Dkt 68, Exhibit E-Exhibit 35, Dkt 69; Exhibit E-Exhibit 36, Dkt 70; Exhibit E-Exhibit 37, Dkt 71, Exhibit E-Exhibit 38, Dkt 72; Exhibit E-Exhibit 39, Dkt 73; Exhibit E-Exhibit 40, Dkt 74; Exhibit E-Exhibit 41, Dkt 75; Exhibit E-Exhibit 42, Dkt 76; Exhibit F-Exhibit 43, Dkt 77; Exhibit E-Exhibit 44, Dkt 78; Exhibit E-Exhibit 45, Dkt 79; Exhibit E-Exhibit 46, Dkt 80; Exhibit E-Exhibit 47, Dkt 81; Exhibit E-Exhibit 48, Dkt 82; Exhibit F-Exhibit 49, Dkt 83; Exhibit F-Exhibit 50 Dkt 84; Exhibit F-Exhibit 51, Dkt 85; Exhibit F, Exhibit 52, Dkt 86; Exhibit F-Exhibit 53, Dkt 87; Exhibit-F, Exhibit 54, Dkt 88.

based on the manufactured or perceived dissidents' association, speech or exercise of religion. *Id.*⁵

⁵ *Id.* Particularly focus on, Exhibit E-Exhibit 10, The Hill, Trump: Jews who vote Democrat show 'lack of knowledge or great disloyalty', by Brett Samuels, 08/20/19 03:38 PM., Dkt 63; Exhibit E-Exhibit 11, MSNBC, *Trump calls for discrimination against Muslims*, By Jane C. Timm, 12/07/15, Dkt 63; Exhibit E-Exhibit 18, Article, Business Insider, *11 insults Trump has hurled at women*, by John Walsh, Oct 17, 2018, Dkt 63; Exhibit E-Exhibit 19, The Guardian, *The Trump allegations A list of the sexual misconduct accusations made against Donald Trump. He has denied the allegations*, by Lucia Graves and Sam Morris, November 6, 2019, Dkt 63; Exhibit E-Exhibit 23, 'No Blame?' ABC News finds 54 cases invoking 'Trump' in connection with violence, threats, alleged assaults. President Donald Trump insists he deserves no blame for divisions in America, By, Mike Levine, Dkt 64; Exhibit E-Exhibit 24, Washinton Post, *The Trump administration said that militarizing the police reduces crime. Is that true*, by Ayse Eldes and Kenneth Lowande, June 1, 2020, Dkt 71; Exhibit E-Exhibit 25, CBS News, *"When the looting starts, the shooting starts": Trump tweet flagged by Twitter for "glorifying violence"*, May 29, 2020, Dkt 71; Exhibit E- Exhibit 27, article, The Hill, *Trump eases ban on political activity by churches*, By Jordan Fabian and Naomi and Jagoda, 05/04/17, Dkt 71, Exhibit E-Exhibit 28, article, *Washington Post*, *Paula White, Trump's key spiritual adviser, will join the White House*, By Sarah Pulliam Bailey, November 1, 2019, Dkt 71; Exhibit E-Exhibit 29, article, National Catholic Reporter, *The key evangelical players on Trump's advisory board*, Sep 5, 2017, by Adelle M. Banks, Religion News Service, Dkt 71; Exhibit E-Exhibit 30, Fox News, *Trump responds to Milley apology for Lafayette Square photo op*, By Brooke Singman, published June 12, 2020, Dkt 71; Exhibit E-Exhibit 31, article, The Hill, *Trump targets Democrats over Pledge of Allegiance*, By Tal Axelrod, 08/22/20, Dkt 65; Exhibit E-Exhibit 32, Article, HuffPost, *Trump Claims COVID-19 Is God Testing Him After He Built 'Greatest Economy In History' The president described boasting to God about his economic successes before the coronavirus pandemic.*, By Carol Kuruvilla, 08/17/2020, Dkt 66; Exhibit E-Exhibit 33, Article, *The Rolling Stone*, *Trump: People Are Saying 'Merry Christmas Again' Thanks to Him*, By Peter Wade, Dec. 23, 2019 4:42, Dkt 67; Exhibit E-Exhibit 34, Article, Fox News, *'I hope it's true': Trump responds to claim he was chosen by God*, By Caleb Parke, June 25, Dkt 68, Exhibit E-Exhibit 35, Article, Fox News, *University professors say more church goers believe Trump is 'anointed by God'*, By Caleb

Trump's conduct creating government religion caused harm to me, personally, by inciting a segment of the population, and in my case specific individuals to foreseeably demonize me, by demonizing Trump's projection of my identifying religious-political associations, causing physical and social harm, and substantially burdening my free exercise of religion, speech, association under the threat of government incited persecution to me personally, but for Trump's conduct.

Parke, May 13, 2020, Dkt 69; Exhibit E-Exhibit 36, Article, CBS NEWS, *Trump tweets quote calling him the "second coming of God" to Jews in Israel*, By Sophie Lewis, 8/21/2019, Dkt 70; Exhibit E-Exhibit 37, The Hill, *Trump: 'We moved the capital of Israel to Jerusalem. That's for the evangelicals'*, By Aris Folley, 8/18/2020, Dkt 71, Exhibit E-Exhibit 38, *CBS News, More than 12,000 Catholic churches in the U.S. applied for PPP loans – and 9,000 got them*, By Christina Capatides, May 8, 2020, Dkt 72; Exhibit E-Exhibit 39, The Hill, *Thousands of Catholic churches received PPP loans: report*, By Lauren Vella, 05/08/20, Dkt 73; Exhibit E-Exhibit 40, BBC, *What are the sexual allegations against Donald Trump?*, dated June 25, 2019, Dkt 74; Exhibit E-Exhibit 41, Religious News Service, *Paula White to head Trump's faith office*, by Jack Jenkins and Adelle M. Banks, November 1, 2019, Dkt 75; Exhibit E-Exhibit 42, The Hill, *Trump claims Biden is 'against God' and will 'hurt the Bible'* By Brett Samuels, 08/06/20, Dkt 76; Exhibit E-Exhibit 44, Tweet by President Trump, "DEMS WANT TO SHUT DOWN CHURCHES PERMENANTLY. HOPE YOU SEE WHAT IS HAPPENING. VOTE NOW!", (Dkt 78; Exhibit E-Exhibit 47, MSN, Daily News, *Trump and aides attend indoor church rally in Vegas without masks*, By Theresa Baine, 10/18/2020, Dkt 81, (Here Trump teaches people going maskless shows faith in Jesus), Exhibit F-Exhibit 49, The Hill, *Eric Trump claims his father "literally saved Christianity,"* By Celene Castronuovo, 10/7/20, Dkt 83; Exhibit F-Exhibit 53, BBC, *Trump inciting violence, warns election official*, 12/2/20 Dkt 87.

I am in reasonable fear of my physical safety by third parties incited by the government-religion the Presidents' conduct created, as we have seen religious persecution arising from government-religious ideology by President Trump. *Id.*

A segment of our population appears to believe Trump is backed by God, or is anointed by God. They are willing to threaten harm and actually harm people who disagree with their government-religious beliefs. Dkt 59, 60.

Someone threw liquid substance on my car when I merely had "Serve your Country, not your seat, Impeach," and "No one is above the law, No one is below the Law Impeach" stickers on the side of my car. Dkt 59-60 at 51. A stranger at a stop sign also talked about shooting me concerning my stickers. *Id.* I took my stickers on the side of my car off. Last year, a Delawarean Greg Layton and his wife were shot at in their home allegedly because Greg speaks up on politics. See Exhibit A-1, Police release. A former Republican candidate in Delaware sued Greg Layton in the Superior Court, allegedly for speaking up on politics. See, Exhibit A-2, *Walker v Layton*, Case S21C-02-016, filed Feb. 12, 2021.

People are facing economic, social and physical threats based merely on their political and/or perceived religious beliefs across the country. But for Trump's words and deeds, I am also individually harmed, but for Trump's incitement against those, including me, who do not support Trump as president or

as a God head, as Christlike. See, Dkt 59-60. *Id.* On May 15, 2021, one of my ex-boyfriends from high school said democrats are “one with Lucifer himself” knowing I am a democrat. Thereby indicating I am one with Lucifer. Other folks in the community say “Trump is anointed by God.”

After, Biden became president, two strangers have attacked me based on their perceived perception of my religious-political affiliation. A lady at TJ Max in Ocean City, I started chatting with, coldly indicated I was not Christian because I did not support Trump. I started crying, and walked away. The staff consoled me through my tears. That meant a lot because the person who cheered me up believed in a different religion. Yet she reflected the image of God by her love. People of other religions may go to heaven by doing the will of God too by such love as opposed to serving the covetousness of man. See, *Romans 2:15* to confirm.

In a little scarier instance, in April, 2021, a man at BJ’s started yelling at me and took off his mask when he perceived I supported Biden. A teenager came to my rescue and asked me is this man bothering you, causing the man to walk away. I am a 110-pound woman. It is a little scary when a big strong man yells at me and approaches me maskless during a global pandemic, potentially spreading sickness in addition to insults. See, Exhibit E-Exhibit 47, Dkt 81, (Here Trump teaches people going maskless shows faith in Jesus).

I will likely continue to be attacked as a direct result of Defendant Trump's establishment of government-religion and government-religious attacks.

In addition, I believe the established government religious beliefs and government religion is misleading people I love to hell. I foreseeably am experiencing foreseeable emotional distress related to this belief manifesting in harm to my health, crying, clenching my teeth, rare sleepless nights, and at times increased blood pressure. ⁶ I am also reasonable foreseeably upset that the name of my holy God is tarnished for Government gain. It is blasphemous, and foreseeably upsets me causing physical manifestations in the form of tears. I love God. I seek to prevent Government from "profan(ing) the name of God" for government gain. Citing, *Leviticus* 21:6, See, *Isaiah* 29:23, ("they will keep my name holy").

President Trump lost the election. Yet Trump may run for President, and win in 2024. I seek to preserve potential claims against Trump from being

⁶ See, Exhibit F-Exhibit 52, Proof my health is affected by the emotional distress caused by President using my precious God and religion in vain, meaning for his own vanity and purpose to glorify self under the guise of God, but reflecting the image of Satan by putting self-first like the devil did in *Isaiah* Chapter 14, Dkt 86. I have religious beliefs against going to the doctors, and am not willing to be examined, as violating my free exercise of religion. Yet I mentioned the President's conduct and establishment of government-religion is affecting my health it in my brief below. Dkt 50-60 at 14 and 63-64.

defeated by res judicata should Trump become President and continue to violate Constitutional laws.

President Biden replaced Trump as president (“Biden”). Biden continues to maintain, exacerbate and create government-religion and government-religious beliefs in violation of the establishment clause, by in part enforcement of E.O. 13798, as well as other executive orders which establish government-religion.

Presidents Bush Junior, Obama, Trump and Biden also passed a series of additional executive orders, making us less free to worship freely, by buying the support of churches by paying them to perform government duties, welfare, thereby, increasing waste by artificial entities without hearts, churches, organizations, not for profits and businesses (“beasts”), who seek to get as much as they can for as little as they can. *Citing, Ex. Or. No. 14015*, Feb. 14, 2021; *Ex. Or. No. 13198*, Jan. 29, 2001, as amended by *Ex. Or. 14015*, Feb. 14, 2021; *Ex. Or. No. 13199*, Jan. 29, 2001, as revoked by *Ex. Or. No. 13831*, May 3, 2018; *Ex. Or. No. 13279*, December 12, 2002, as amended by *Exec. Or. No. 13559*, November 17, 2010; *Ex. Or. No. 13559*, Nov. 17, 2010.; *Ex Or. No. 13831*, May 3, 2018; *Ex. Or. No. 14015*, Feb. 14, 2021, (Collectively “Executive Orders”).⁷

⁷ Bush, Jr signed executive orders that allow churches to accept government money to perform government functions under the guise of charity, but in truth to carry out government business. Bush’s orders mandated deregulating and removing of

Beasts run on cold hard cash, not love, no matter the name of the entity, church or not for profit, when they seek to give to get under the illusion of charity, but in truth are paid money to perform government business by the government.

See *Matthew* 6:1-5. The Executive Orders create inefficiencies, while increasing

obstacles, meaning removing the Establishment Clause Protections. *E.O.* 13198, 13199, 13279, 13342, 13397. Obama misbehaved by failing to revoke Bush's Executive orders. Instead, Obama drafted safeguards for recipients, including the prohibition for churches, and other government service providers, from turning recipients away from federally funded services based on diverse religious belief or non-belief, and required notification to potential recipients of other providers should recipients feel uncomfortable receiving government services from religious organizations by amending Bush's executive order on November 17, 2010, by signing *E.O.* 13559. President Trump passed *E.O.* 13831, which revoked section 2(h) of Obama's amended *E.O.* 13279, the section requiring alternative provider referral and notice of rights for beneficiaries of federally funded social service programs. *Citing, E.O.* 13831 § 2(b). Trump's executive order eliminated protections Obama put in place for beneficiaries of the services who may otherwise be forced to glorify church business under the illusion of charity, while being tax payer funded or go without vital government services. See, 85 FR 82037-01, 2020 WL 7388268, (implementing Trump's E.O. 13831). Biden misbehaved by passing *E.O.* 14015 which expressly discussed protecting the *Free Exercise and Establishment Clauses* while arguably violating the same, even discussing partnerships with churches or religious organizations. *Id.* at section 1. The Presidents misbehaved, and are in need of the Court's guidance and correction to dissolve the bought and bartered for, not free union of church and state to prevent future misbehavior and immediate harm to me, Americans and the world. Federally funding churches, businesses and not profits to perform government work, will likely be exploited in the *Agenda for Sustainable Development 2030 plan*, whose aims are noble, but implementation will cause great harm, and elimination of freedom, replaced with control, and increased exploitation and involuntary servitude. Biden permits government funds to pay churches to perform government business, overseas too. I hope this court tames the beasts with the Constitution by applying the rule of law, to defeat the rule of lusts to save the world by preventing additional foreseeable harm.

government debt for government gain, at the cost of making us all less free. Far worse, the Executive Orders encourage churches to supplement with alleged charity, by fundraising or otherwise, to serve business greed. I believe business greed damns the perpetrators and those they mislead to hell, causing economic harm here, and damnation in hell forever, by the bought or bartered for loyalty of churches to political parties, candidates to offices and government agents in an unholy whored union of church and state, not free, but for sale. I believe the government should perform its own work instead of paying churches, or other organizations, to become the government's whore for hire, not performing true charity, but teaching the world the mark of the beast, under the guise of good and godliness, business greed.

Since, I filed in forma pauperis, I am likely eligible or possibly was eligible in the past to receive government aid by churches who perform government welfare in exchange for government funding in part or in toto, including but not limited to my own Catholic Diocese. Yet, I refuse to ask for aid as it violates my belief in Jesus, since I believe such aid damns people to hell by teaching business greed is charity, driving out love from the hearts of man replaced with the love of money and material gain, the mark of the beast, business greed. Matthew 6:1-5. Jesus teaches they will not go to heaven or have eternal life. "(T)hey have their reward." Matthew 6:1.

My Diocese of Wilmington, accepts government funding in part, and in toto for alleged charity but in truth the business of government, thereby I believe violating Jesus's teachings in Mathew 6:1-5.

VI. Argument 1

1. **Question Presented:** Whether I met the burden of standing, by “establish(ing) an actual or concrete injury (to me) caused (but for) Trump's conduct” to preserve future and additional claims, against Trump related to his creation of government-religion and government-religious-beliefs, as capable of repetition to defeat res judicata, should Trump be reelected as President. Dct 59-60.

2. **Standard of review.** The standard of review of the Delaware Supreme Court for The Vice Chancellor’s findings as to both as to law and fact, is de novo “when deciding legal or constitutional questions.” *Citing, Ploof v. State*, 75 A.3d 811 (Del. 2013), *as corrected* (Aug. 15, 2013)

3. **Merits of the Arguments:** I met the burden of standing to preserve potential future additional claims, with prejudice, against Trump, to defeat res judicata should future possible claims arise. The Court must not dismiss such claims without prejudice, at this time.

I met the burden of standing, by “establish(ing) an actual, concrete injury (to me) caused (but for) Trump's conduct” to preserve future and additional claims, with prejudice, against Trump related to his creation of government-religion and government-religious-beliefs, as capable of repetition but evading review, to defeat res judicata, against him, for additional violations of the laws argued in my brief

below, and herein, incorporated herein fully, should Trump be reelected as President. Dkt 59-60, Dkt 95, at footnote 3.

Through a series of collective behavior, by words and deeds, referred to in the brief and incorporated herein as if fully stated, Trump established government-religious beliefs and government-religion, reasonably, foreseeably, but for, inciting people to accost me, a perceived dissident of Trump's government-religion, causing actual persecution against me, manifesting in physical symptoms, and the continued threat against me, as a perceived dissident to Trump's established government-religion. Brief below, Dkt 59-60 at 15-20.

“Trump manufactured the illusion loyalty to his administration or the Republican party is loyalty to God, and that supporting ideas which conflict with Trump or his party is antichrist. As a direct, intentional, dependent result, Trump incites people to persecute democrats, including and specifically me, (with the very real threat of violence, or foreseeable physical harm stemmed in logical manifestations of valid, reasonable emotional distress), as antichrist, often leaving my free exercise of speech, association and religion left restrained or unexercised.” Citing, Brief, Dkt 59-60 at 14-15, Also see, Exhibit F-Exhibit 53, BBC, *Trump inciting violence, warns election official*, 12/2/20, Dkt 87; Exhibit E-Exhibit 25, CBS News, *"When the looting starts, the shooting starts": Trump tweet flagged by Twitter for "glorifying violence,"* May 29, 2020, Dkt 71, (Here, Trump incited the

manufactured, false threat peaceful protesters pose a material risk, and encouraged violence against Americans for merely exercising their first Amendment freedom of association, and speech to gather, collectively to peacefully protest views. Presidents should encourage the use of words, the free exchange of ideas, as opposed to weapons against fellow Americans who merely share a different belief. Instead, Trump manufactured fear, exploiting the psychological manipulative, deceptive doctrine of the “self-fulfilling prophesy” espoused by, *inter alias*, American sociologist, Robert K. Merton, to serve Trump); Exhibit E-Exhibit 23, Article, *'No Blame?' ABC News finds 54 cases invoking 'Trump' in connection with violence, threats, alleged assaults. President Donald Trump insists he deserves no blame for divisions in America*, By Mike Levine, Dkt 64.

It is reasonably logical to conclude Trump caused third parties to behave violently. But for, dependent upon Trump’s incitement, such violence and threat of violence, would not have occurred against me or others.

The Establishment Clause must limit federal agent’s speech to prevent inciting third parties to persecute people based on perceived or actual religious orientation, should such speech logically cause such persecution, based on religious orientation. *See, Young v. Red Clay Consol. Sch. Dist.*, 122 A.3d 784, 805 (Del. Ch. 2015); *Pleasant Grove City v. Sumnum*, 555 U.S. 460, 467-468, 129 S.Ct. 1125, 172 L.Ed.2d 853 (2009). Trump disregarded the Constitutional limits.

Trump is likely to continue to benefit from government-religion, and worsen the establishment of government religion since he is likely to run in 2024. Two entities were formed called Trump 2024, prior to the January 6, 2020 insurrection, manifesting an intent that Trump would likely run in 2024. See, Exhibit A-3, attached, as newly discovered evidence that must be admitted in the interest of justice. In April, 2021, I observed three Trump 2024 flags on Route 26, in Sussex County, Delaware. There is a web site fundraising to support Trump's reelection in 2024, including but not limited to, <https://trump2024.team/>. Trump stated, "he is "thinking about running, and we will, I think, be very successful."

As I argued in my brief below, though Trump is no longer a Defendant, other than name only, in this unusual case, the issues against Trump are capable of repetition yet evading review, and must be preserved, with prejudice. Dkt 59-60 at 2, 4, 59-62.

No person would accost me for not supporting Trump as a backed by God, before Trump's establishment of government religion, but for Trump's collective misbehavior, directly inciting individuals to persecute me based on demonizing my perceived, or projected associations. I am concretely, particularly injured. Trump directly caused the harm I face, and continue to face. The injury leading to the potential and actual physical harm and threat of harm is "fairly traceable to the challenged action of President Trump's establishment of government religion and

not the result of the independent action of some third party not before the court, but dependent on the Defendant's incitement to persecute dissidents of Government-Trump-religion and worship or backing of party or Trump as a God head, or God's anointed.

Trump is no longer President, yet, "(1) the challenged conduct action is in its duration too short to be fully litigated prior to its cessation or expiration, and (2) there is a reasonable expectation that the same complaining party will be subjected to the same action again." *United States v. Sanchez-Gomez*, 138 S. Ct. 1532, 200 L. Ed. 2d 792 (2018). See, Vice Chancellor's concern at Dkt 95 at ft 3.

Trump, should he be re-elected, will likely persist in the same course of lawless behavior establishing government-religious beliefs to glorify himself and dehumanize his dissidents, demonizing me, by identifying my political position as anti-Christ, misleading people to persecute me by unholy government-backed incitement, causing additional physical harm and suppression of my free exercise of religion, speech and association.

I reasonably, foreseeably fear greater physical and Constitutional injury to me should Trump be reelected, without the Court's ability to restrain him.

I pray this honorable court prevents res judicata from applying for my potential claims against Trump, since he will likely run in 2024, and become

reelected. People have already been killed based on their political-religious beliefs in recent years, directly caused by and but for government incitement through former President Trump's Government-religious espoused or projected religious ordained beliefs.

The establishment of government-religion creates an inherent threat inciting people loyal to government-religion, as if the leaders were ordained or backed by God, to physically harm those disloyal to government-religious beliefs.

Our government, and government employees should not be permitted to use religion to reign, by establishing governing-religion, like other countries, including Israel.⁸ We must respect people's free exercise of conscience, including my own, to worship or not according to our own conscience, our own free will, not forced will of others, which is not freedom but enslavement to the religious wills of the

⁸ Israel reigns by violence or threat of violence, requiring two-year service of every citizen in the army, under the guise of God and government, an unholy-union. Israel violates the Torah, the Book they profess to govern under by persecuting Muslims and Palestinians when God says in *Deuteronomy* 10:19, "you are to love those who are foreigners, for you yourselves were foreigners in Egypt." "When a foreigner resides among you in your land, do not mistreat them. In *Leviticus* 19:33-34, God says, "The foreigner residing among you must be treated as your native-born. Love them as yourself, for you were foreigners in Egypt. I am the LORD your God," See *Romans* Chapter 9, Not all Israel is Israel, it is not by bloodline.

few under the threat of social, economic, or violent government sponsored persecution.

We must keep ourself separate from the sins of other countries, by upholding the people's choice, their freedom to worship or not, according to the dictates of their own conscience, not the religious dictates of the government and government employees, including the President, or government agents, including not for profits and businesses, receiving government funds to perform government business.

As I noted in my brief below and in a letter to the Honorable Vice Chancellor, I suspect a global war may logically be incited by the established government-religion to serve greed, war profit, under the guise of God, if this Court does not dissolve the unholy bought or bartered for, not free union of church and state. Dkt 59-60 Letter, dated December 4, 2021 and Brief at 60.

With regards to another concrete injury to me, the Vice Chancellor correctly points out, I do not want people to go to hell. I believe in Jesus, and I love others. I believe Trump misleads people I love to sin, and travel the wide path to hell, under the guise of Godliness. *Matthew 7:13-15, Matthew 7:21-23, Luke 13:23-28.*

The Vice Chancellor does not need to believe Trump misleads people to hell. Dkt 95.⁹

The Court merely must believe that I genuinely believe people will go to hell, but for Trump's conduct establishing government-religious beliefs, and that but for, directly resulting from, that religious belief stemmed in the establishment of government-religion, I am experiencing emotional distress reasonably foreseeably manifesting in the **actual, concrete** bodily harm, tears, high blood pressure when I am rightly angry by the delusional, dangerous established

⁹ 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.”); *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.”).

government-religion taught by the government, and clenching my teeth, but for the governments establishment of religion. (**Emphasis intended**). See, *Isaiah* 3:12, 9:16, *Matthew* 15:14, 24:4, 24:11, *Jeremiah* 23:13, *Micah* 3:5.

VI. Argument 2

Questions Presented: Whether Meghan Kelly should be granted permission to file a motion to substitute President Biden for President Trump in an attempt to continue this case to safeguard her fundamental freedom of free exercise of religion, speech and association from substantial government burdens, in the Chancery Court below, as meeting the burden of standing.

A. First, is there an injury? Does President Biden's enforcement of the Executive orders and E.O. 13798 run afoul of the prescribed tests for violation of the Establishment Clause of the Federal Constitution by establishing government-religion and government religious beliefs? U.S. Cons. Amend. 1.

B. Second could President Biden's enforcement of the Executive orders and E.O. 13798, constitute excessive entanglement? Dkt 59-60.

C. Third, if so, does the President's excessive entanglement by action or inaction constitute a legally recognizable burden on my Constitutional right to freely exercise my religion?

D. Fourth, if my right to freely exercise my religion is legally burdened, is such burden justified by a compelling State interest?

E. Fifth, would the relief requested alleviate my burden?

F. Whether the Court may deny my access to the courts to address my fundamental rights.

2. Standard of review: The standard of review of the Delaware Supreme Court for the Vice Chancellor's findings as to both as to law and fact, is de novo "when deciding legal or constitutional questions." *Citing, Ploof v. State*, 75 A.3d 811 (Del. 2013), as corrected (Aug. 15, 2013).

3. Merits of the Arguments: I must be granted permission to file a motion to substitute President Biden for President Trump in an attempt to continue this case to safeguard my fundamental freedom of free exercise of religion, speech and association from substantial government burdens, in the Chancery Court below, as meeting the burden of standing.

A. There is a Constitutional injury. President Biden's enforcement of the E.O. 13798 and Executive orders run afoul of the prescribed tests for violation of the Establishment Clause of the Federal Constitution by establishing government-religion and government religious beliefs.

I am a Catholic, Christian, Democrat, injured by the Unconstitutional establishment of government-religion and government-religious beliefs whose seeds of greed, not God, were planted by a slew of Executive orders based on buying God, religion, with money, by Presidents Bush Junior, Obama, Trump and

Biden, making my God, my church, the government's paid whore, that took root and broke American soil with religious dissention, persecution, violence and murders based on government-religious beliefs in the US.¹⁰ Trump merely watered, exacerbated, enticed and exploited government-religion to serve himself by, in part, fueling the illusion of God backed government, at the people's expense. Biden continues to harvest weeds of greed, not good by enforcement of Executive Orders and E.O. 13798. See *Matthew* Chapter 13 regarding seeds and weeds.

My goal is for this Court to pull out the roots of unrest, the weeds of greed stemmed under the guise of religious freedom, when it is whoredom, by barter or exchange, business, not freedom, at the cost of something more precious than money, my, and my fellow Americans' freedom to worship or not according to the dictates of our own conscience without government-sponsored persecution, based on established government-religion.

The Executive Orders require government organizations and agents to partner with churches to pay churches to perform government business for the

¹⁰ I reserve the right to use harsh language under the edification exception in the Bible, and the truthful language requirement in Court. In *Amos* 4:1, the Prophet called exploiting wealthy ladies, "fat cows." Additionally, more than one prophet called people they hoped to correct and save, whores or prostitutes. For example, see *Ezekiel* 16:34, *Jeremiah* 3:1, *Leviticus* 17:7 and *Judges* 8:33. Prophets called God's beloved people "wild asses" too. *Jeremiah* 2:24 and *Hosea* 8:9.

government, instead of government workers performing their own jobs. The churches create the illusion of charity while serving business greed. I believe people will be damned to hell for thinking business greed is charity, by even fundraising, and organized charity. Such thinking, doing, learning and teaching drives out love from the hearts of men replaced with the love of money, business greed, under the guise of God. I believe the Executive Orders tempt churches to partner with government in a bought, not free union of government-religion to serve Satan by chasing after money under the guise of God, as they exploit the needy to serve the greedy, including their own greed. God teaches us “to seek the kingdom of heaven first,” that we “cannot serve God and money, and that “the love of money is the root of all evil.” Citing *Matthew* 6:24-33, and 1 *Timothy* 6:10.

In *Matthew* 6:1-5, Jesus commands:

“Do not do your charitable deeds before men, to be seen by them.

Otherwise, you have no reward from your Father in heaven, (meaning no eternal life in heaven). When you give to the needy, do not sound a trumpet before you, as the hypocrites do in the synagogues and on the streets, to be honored by men. Truly I tell you, they already have their full reward, (meaning no reward from God in the form of eternal life). But when you give to the needy, do not let your left hand know what your right hand is doing, so that your giving may be in secret, (meaning do not get out of one

hand to receive out of the other. That is business not love). And your Father, who sees what is done in secret, will reward you (meaning grant you eternal life, should you remain in his love).

Having filed this appeal in forma pauperis, I am or likely have been eligible to receive federal funded assistance through churches, including my own Catholic Church St Anne's, or the Catholic Diocese.¹¹ I chose not to sin against God by violating Jesus's teachings in Matthew Chapter 6, by seeking such federally funded aide administered through religious organizations, misleading people to hell, under the guise of heaven, under the unholy whored cloak of government-religion. I feel sick to my stomach understanding how churches and religious organizations may be federally funded in part or in toto now. It is a far worse sin for churches to become the government's whore for hire, to serve a government function, under the guise of charity, but in truth for business. Whore is a biblical term meaning

¹¹ See, <https://www.ccwilm.org/basic-needs/energy-assistance/>, The Catholic diocese receives 100 percent funding to help the poor with energy bills. I do not think there is another entity poor people may receive this specific type of aid in the state of Delaware, per their staff. Also see, <https://www.ccwilm.org/basic-needs/>. Please note other churches in Delaware allegedly are paid to perform the government's job for them, under the guise of charity. It is just business, not charity, misleading people to hell by teaching them business is love, replacing the unconditional love in the hearts with business greed, the mark of the beast. The only funds that are distributed to Catholic Charities by parishioners is the appeal, collected at mass, distributed to the different entities. It created the illusion churches are paying for welfare out of pocket, which is not true. It is out of the tax payers' pockets.

adultery by making money, or something or someone else your savior or idol, in place of God.¹²

E.O. 13798 runs afoul of the establishment clause by allowing God's representatives, churches and religious entities to provide church and religious backing to government parties and government agents or potential government agents, and allows such government agents or potential agents to receive church and religious support by money, advertising or otherwise, creating the appearance mere government parties or government officers are backed by God, or anointed by God.

A portion of the population profess to cling to this government-religious belief. Whether their belief is based on greed or sincere belief is questionable. Yet the violence and harm based on this government-religion arising across the nation, and against me, based on religious-political beliefs in recent times is not.

Government servants are mere men, not God's anointed. I believe Jesus is the savior, not mere men. It is wrong to allow religion to back government with funding or otherwise, as opposed to individual religious people. It is also wrong to

¹² I believe privatizing government duties and supplementing with fundraisers exploits the population, increases taxes, and teaches the citizens the way to hell by teaching them to love money as their savior driving out their unconditional love for others and for God.

allow religious entities to buy or barter for government power, influence with money, support, favors or otherwise, through donations to government candidates or government parties, as this executive order permits. See, Exhibit E-Exhibit 38, *CBS News, More than 12,000 Catholic churches in the U.S. applied for PPP loans and 9,000 got them*, By Christina Capatides, May 8, 2020, Dkt 72; Exhibit E-Exhibit 39, *The Hill, Thousands of Catholic churches received PPP loans: report*, By Lauren Vella, 05/08/20, Dt 73.

The United States is a democracy, not a theocracy, with freedom of religion, not forced religion under the threat of government sponsored private and public economic, physical or social persecution, such government-religious-beliefs and government-religious-parties inherently create.

My God is not for sale for government gain. My God is not a whore for government officials to exploit like a high school mascot rallying behind their own glory and self-gain in government under the guise of Godliness, essentially making themselves their own gods, reflecting the image of the devil. See *Isaiah Chapter 14*, to see how the evil one misbehaved by seeking to make himself his own God.

The Third Circuit held, “Neither a state nor the federal government can, openly or secretly, participate in the affairs of any religious organizations or groups and vice versa.” *Doe v. Indian River Sch. Dist.*, 653 F.3d 256, 259. Here the

executive orders allow both the state and the federal government to openly and in secret participate in the affairs of religious organizations and vice versa, violating the Establishment Clause.

B. The conduct I refer to herein, the continued enforcement of E.O 13798 and the Executive Orders by Biden, constitute excessive entanglement by establishing government-religious associations and beliefs, by the partnered paid, not for, but for sale, union of church and state.

“The Establishment Clause prohibits government from establishing a religion in the sense of sponsorship, financial support, or active involvement of the sovereign in religious activity.” *Kalman v. Cortes*, 723 F. Supp. 2d 766, 769, 2010 U.S. Dist. LEXIS 65171, *1, 39 Media L. Rep. 1039.

E.O 13798 and the Executive Order’s impact in fact tempts government leaders to support religious institutions, and establish government-religion by partnering with churches in a bought for, not free union, in terms of bail outs, payment for services, loans or partnerships, with the hope or expectation of loyalty in the form of verbal or financial support. Dkt 72-73, Exhibit E, Exhibits 38-39. The Executive Orders legislating government partnering and paying churches to perform government work excessively entangles government and religion.

C. The excessive entanglement by Biden’s continued enforcement of E.O 13798 and the Executive Orders constitute a legally recognizable burden on my Constitutional right to freely exercise my religion based on political and religious affiliation and my personal religious beliefs.

“The very adoption or passage of a policy that violates the Establishment Clause represents a constitutional injury.” *Kitzmiller v. Dover Area Sch. Dist.*, 400 F. Supp. 2d 707, 708, 2005 U.S. Dist. LEXIS 33647, *1.

Biden’s establishment of government-religion by enforcement of the Executives Orders, but for, substantially burdens my free exercise of religion, speech and association in violation of *Religious Freedom Restoration Act* (42 USCS §§ 2000bb et seq. (“RFRA”), and the Equal Protections component of the Fifth Amendment applicable to Biden. I am individually injured, but for the President’s conduct establishing government-religion, as a class of one, based on perceived or projected religious-affiliation, as a democrat, Christian, Catholic, uniquely me, with me personally religious beliefs.¹³

¹³ “Religious Freedom Restoration Act (42 USCS §§ 2000bb et seq.), by its terms, addresses only free exercise of religion claims, and does not address equal protection claims arising from alleged unequal treatment of religious practices by government; thus, plaintiff can maintain equal protection claim” *Tyson v. Ratelle*, 166 F.R.D. 442, 1996 U.S. Dist. LEXIS 5697 (C.D. Cal. 1996). I seek to bring a RFRA claim for the substantial burden government-religion burdened upon my free exercise, as alleged by the facts herein, and incorporated herein by reference.

I am still experiencing emotional distress, manifesting in physical symptoms, and threat of physical harm by third parties directly incited but for the established government-religion the executive orders also created in violation of the Establishment Clause.

In addition, I face potential material loss. This is a less important injury the Supreme Court appears to value more than 1.) the freedom of conscience, replaced with bought consciences of entities who exist on cold hard cash, churches, not love. 2) injury to persons as opposed to injury to entities' potential profits, and 3) safeguarding free will to safeguard eternal life from the forced will, or controlled, not free will, of the state through its agents, including churches, under the threat of government sponsored persecution.

If I comply with application procedures to receive federal aid by churches, including Catholic Charities, I will be facilitating belief that leads to damnation in hell. In *Burwell v Hobby* 573 U.S. 682, 688-91 (2014), the plaintiff believed they would be facilitating abortions by paying for healthcare as part of their business to make money. The Supreme Court held the required payments were not required under a RESPA claim.

Burwell was about money not freedom, under the guise of freedom, as distinguished from my case. If you are in business. It is not free, or freedom. It is

for sale. Businesses receive licenses for permission to perform business. If your business requires you to force your religious will upon your employees, their free will, their freedom of religion is replaced by the employer's government backed forced will, controlled will, under the threat of government sponsored or allowed economic persecution, an employee's potential loss of job by violating an employers' religion or alleged religion. I say alleged since I suspect the mark of the devil, beast, the bottom line, greed, not God, not good, not love is the motivating factor to eliminate the employer's healthcare insurance costs.

The Supreme Court's confused thinking makes us all less free. We are all for sale in violation of the Thirteenth Amendment. Yet, I must argue people are not for sale, but are free. They are priceless, not price tags, not human capital, and chattel for those with money, power and connections to exploit to serve the bottom line.

In *Trinity Lutheran Church of Columbia, Inc. v. Comer*, 137 S. Ct. 2012, 198 L. Ed. 2d 551 (2017), "Chief Justice Roberts, held that Missouri's anti-establishment provision "punished the free exercise of religion" by putting would-be aid recipients to the choice whether to give up the aid or give up their religious natures.' Brendan T. Beery, *Free Exercise Standing: Extra-Centrality As Injury in Fact*, 93 St. John's L. Rev. 579, 598 (2019).

I too am similarly punished for free exercise of religion as a result of the Executive Orders' impact, as applied to me, by making me choose between serving Jesus, or compromising my belief in Jesus to receive government aid by churches. I chose not to ask for aid. I do not choose to disobey Jesus and mislead other people God loves to the thinking, the belief in a lie that will damn them to hell.

My religious beliefs prevent me from applying with my church for governmental funded services. "A community member should not be forced to forgo a government service to preserve his or her ability to challenge an allegedly unconstitutional religious display or activity." *Citing, Freedom from Religion Found. Inc v. New Kensington Arnold Sch. Dist.*, 832 F.3d 469, 479 (3d Cir. 2016).

In order to receive government aid, I am forced to violate my religious beliefs, by applying for or accepting benefits from a religious organization. Thus, I go without potential aid, but for the establishment of government-religion, a union, a partnership based on pay, not freedom, which is not freely established but is established in a bought or bartered for union, making us all less free. See, *Sherbert v. Verner*, 374 U.S. 398, 399, 83 S. Ct. 1790, 1791.

D. Given, my right to freely exercise my religion is legally burdened, such burden is not justified by a compelling State interest. There is no compelling interest for Government parties and government employees and potential employees to receive money or to partner with churches to govern, by in part,

paying the churches to perform the tasks the Government does not want to perform. Through the Executive Orders the Government impermissibly serves the interest of those who wield government power, to receive the apparent backing of God, and to increase waste by paying churches to perform their jobs for them.

E. Fifth, the relief requested would alleviate or eliminate the burden upon my free exercise of religion, association and speech.

Dissolving the bought or bartered for whored, not free, union of church and state by rendering the E.O. 13798, and the Executive Orders and code provisions affected by such orders as unconstitutional, and enjoining Biden from enforcing the same will reduce and likely eliminate additional injuries to me, caused but for the established government-religion. I am not safe to freely worship by living my faith due to Government sponsored incitement directly caused by the establishment of government-religion.

Although President Trump is no longer in Office, this Court can require Biden to eliminate the root of the bought or bartered for union of government-religion and government-religion, to prevent exacerbation of harm towards me, and indirectly others but for the bartered for bought union of religion and state.

F. The Court must not deny my access to the courts to address my fundamental rights, from unconstitutional burdens, applied to me in violation of the

RFRA, the Establishment Clause and the Due process component of the Fifth Amendment.

The Court must not deprive me of the opportunity to be heard. I should not be deprived of access to the courts, to prevent denial of my Constitutional rights. I must be granted leave by this Honorable Court for an opportunity to amend my complaint with the Chancery Court below, to seek nominal damages, to replace President Trump with President Biden, and by narrowing the facts to President Biden's misbehavior and impact upon me personally. See Dkt 59-60 at 64-66

“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). *Id.* “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).

There is arguably evidence the Court is seeking to deny my claim based on “potential prejudice” relating to wealth, affiliation and/or religious belief. *Id.* See, the two motions I filed with this honorable Court, incorporated herein as Exhibits A-4, and Exhibit A-5, included herein, and incorporated in toto, S Dkt 16, 18, 19,

21, 22, 23, 24, 25. “Courts are cautioned that because of the liberal pleading standard, a plaintiff should generally be granted leave to amend before dismissing a claim that is merely deficient.” Citing, *Grayson v. Mayview State Hosp.*, 293 F.3d 103, 108 (3d Cir.).

My theory is not an “indisputably meritless legal theory,” but is based on sound logic on matters of personal faith, my religious beliefs and free association and speech relating to those beliefs. I may recover under a conceivable set of circumstances susceptible of proof under the complaint. *Gagnon v. Taylor*, 1998 Del. Super. LEXIS 408, *1, 1998 WL 729625.

This Court must grant me the opportunity to be heard to safeguard my freedom to worship or not without government sponsored private or public persecution. This Court must allow me to plead to remove the establishment of government-party-religion, by rendering E.O. 13798 and the Executive Orders unconstitutional, and enjoining Biden and future Presidents from enforcement of the Executive Orders.

Dated: June 8, 2021

Respectfully submitted,

/s/ Megan Kelly
Meghan Kelly, Pro se
34012 Shawnee Drive
Dagsboro, DE 19939
(Word Count 9,517)

APPENDIX F

IN THE CHANCERY COURT OF THE STATE OF DELAWARE

Meghan Kelly,)

Civil Action No.: 2020-0809 PWG

Plaintiff)

v.)

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 United States)

Defendant.)

PLAINTIFF'S BRIEF IN SUPPORT OF HER EXCEPTIONS TO SPECIAL MASTER'S FINAL REPORT, DATED NOVEMBER 2, 2020

Dated: December 5, 2020

Respectfully submitted,



Meghan Kelly
34012 Shawnee Drive
Dagsboro, DE 19939
Bar Number 4968
Pro Se
(Word Count 14,995)

NATURE AND STAGE OF PROCEEDING

This case arises as a result of President Trump's unholy-union of government-religion, directly causing, continuous, ongoing government sponsored suppression of my free exercise of religion, speech and association under the threat of government sponsored private and/or public persecution towards, me, a non-Trump supporting, liberal, Christian, Democrat whose views conflict with Defendant's perceived or projected views in religion and government.

I initiated this case for equitable, injunctive, declaratory relief, costs, and other relief that this Court deems just, equitable, and proper.”¹

On September 22, 2020, the Court granted my petition to proceed in forma pauperis and accepted the Verified Complaint, (attached hereto and incorporated fully herein, as Exhibit A), the Exhibits to the Verified Complaint, (attached

¹I included costs in case I retained an attorney. The Third Circuit granted “attorney’s fees for nominal damages and favorable judgment on merits of her Religious Freedom Restoration Act, 42 USCS § 2000bb” claim. Citing, annotation to, 42 USCS § 1988, the statute granting attorney fees, and *Abdi Jama v. Esmor Corr. Servs.*, 549 F. Supp. 2d 602, 2008 U.S. Dist. LEXIS 32943 (D.N.J. 2008), vacated, remanded, 577 F.3d 169, 2009 U.S. App. LEXIS 17950 (3d Cir. 2009).

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.

hereto, and incorporated herein fully, as Exhibit B, internally labelled as Exhibits 1-9, outlined more specifically in the table of contents), together with Plaintiff's Motion for Temporary Restraining Order, (attached hereto, and incorporated herein fully, as Exhibit C), Plaintiff's Motion to Expedite, and Plaintiff's Memorandum of Law in Support of Plaintiff's Motion for Temporary Restraining Order and Motion for Expedited Relief, (attached herein, and incorporated fully, as Exhibit D).

Docket Item ("D.I.") D.I. 1-15, 19.

Within, the Verified Complaint, I referred to various newspaper articles or web sites I printed out, (attached herein, and incorporated fully, as Exhibit E, internally labelled Exhibits 10-42).

Attached, please find additional exhibits, (attached hereto and incorporated herein fully as Exhibit F, internally labeled Exhibits 43-54).

On or about October 5, 2020, I filed an Amended Complaint, simultaneously with, a Motion to amend the complaint to remove President Trump in his official capacity, and to indicate I may amend again should Vice President Biden get elected concerning arguments capable of repetition and evading review.² D.I. 27-34.

² Government citing to or accepting praise under John 15:13, and President's statements ending in "God bless America" for government glorification in place of God's is sin. My speech has been left restrained and unexercised as a result of

The Registrar issued subpoenas for Defendant President Donald Trump and US Attorney William Barr, but withheld the subpoena for the US Attorney for the District of Delaware, through the civil process clerk. D.I.35-36.

On October 12, 2020, I filed a Second Amended Complaint to include the United States as a party, as required under the Federal Rules of Civil Procedure. I also included the term President. Should Defendant not remain in office, I will seek to replace Defendant with President Biden under Rule 25. D.I.53.

On October 12, 2020, I filed a Motion to amend the amended complaint with a second amended complaint, and a corrective motion on October 13, 2020, (“Motion”). D.I.50, 60. In the Motion, I allude to the fact I may amend the Complaint again to seek to hold Ex. Or. No. 13798, 82 Fed. Reg. 21675, May 4, 2017, (“Executive Order”), unconstitutional. Yet, I feared it would slow down the case due to foreseeable interpleading by churches and religious organizations who make Jesus’s “father’s house into a marketplace.” Citing, John 2:16.

these specific government-religious beliefs based on deceptive propaganda, not truth, to mislead many, including government troops to violate Jesus’s teachings under the guise of following Jesus.

Just because presidents have been doing it for years does not mean it is right, or that somehow previous generations were smarter than us. We can learn from their mistakes, instead of repeating them, to come up with a more just, fair and free America today.

I believe the Executive Order misleads people I love to think the mark of the beast, also known as the evil eye, is good when it leads to harm in this life, and hell in the next without repentance. (See, Matthew 6:23, Mark 7:22, Proverbs 28:22 relating to evil eye).

I believe the evil eye is the focus on what people can get for themselves, their family or those who serve their interest without reflecting love towards those they seek worldly gain from. I believe people do evil by teaching charity, pro bono, fundraising, volunteering is good. I believe it damns people to hell by driving out love from the hearts of men, replaced with the love of money or business greed for worldly gain by barter or exchange. See Exhibit B, refer to Exhibit 2 relating to donations, volunteering, even gathering signatures serves Satan by violating Jesus in Matthew 6:1-4 misleading people to exploitation, harm and hell.

In Matthew 6:1-4, Jesus Christ says do not give seen. When you give charitable alms, do not know your left hand from your right, meaning do not give to get, no matter how small, including, trading favors, back pocket alleged good deeds, marketing, tax breaks, getting your foot in the door for a job, or the social aspect. All of these lead to harm, exploitation of those in need, and hell, by teaching people business greed is love, (the mark of the damned). Love is sacrificial, not getting, merely giving unconditionally. See, Matthew 10:8, "...You

received without paying, now give without being paid.” True charity is done in secret without reward, or it is not charity. It is just business. It is wickedly deceptive to say otherwise.

There is no shame in humbling yourself and asking for charity directly. I believe it is sin to ask on behalf of others under the guise of charity for self-gain, no matter how small, including praise of men and tax breaks. Organized charities and business fundraising violate Jesus Christ’s teachings. I believe school children fundraising for praise, pizza, or prizes, learn the way to hell, the mark of the beast, is love, giving to get is love. No, business by barter or exchange, even for praise or forced peer pressure to fit in, is business, not love. Love is unconditional. I believe all people should be respected unconditionally, unearned, regardless of race, religion or place of origin. Business is not the sin. I believe teaching business greed is love is sin. The bible teaches those who misunderstand go to hell, even children are damned to hell. See, Ezekiel 9:3-6, Luke 17:2, and John 3:1-14 to confirm children go to hell too.

Not knowing is not innocence regarding spiritual truth. It is guilt, per God. See Exhibit A at 93, Ephesians 4:18, Matthew 13, and Hosea 4:6, Acts 17:30, “In the past God overlooked such ignorance, but now he commands all people everywhere to repent.”

Teaching children young teaches them to praise their exploiters in congress, business and in charities who make individual gain off of the many, under the guise of serving them charitably, by seeking donations or giving items or money out for, in part, self-gain, via marketing, trading favors, good will or tax breaks, as they grow older. See, Isaiah 5:20.

I believe campaigning, fundraising, as well as organized charities and business and not for profit bail outs or incentives without strings attached to serve election seats is the source of our unjust and unenforceable laws. See Isaiah 10:1.

By allowing campaign finance via donations, officials in the executive and legislative branches are tempted to serve those who serve their seats, at the expense of those they are charged to serve. This is especially dangerous when they are tempted to serve religious groups who favor them, at the detriment of those who believe differently than such groups, for me, and people like me with diverse religious beliefs or for those with non-beliefs.

Some laws create the illusion of the law, but are unenforceable or are too burdensome for the injured to enforce, to the profit of those who fill the pockets of the politicians. Lawlessness seems to reign. Bad business should not be rewarded by the government. See Exhibit A at 236-292.

For example, the UCC is made to exploit customers. The manufacturers should bear the burden of risk relating to insurance to encourage them to create made to last, made to work products. The statute of limitations should be extended beyond 3 or even 10 years. Laws should not reward made to break, made to repair, or made to replace products or parts, which pollute and pick the pockets of the common man for bad services and products.

The various standards of care in business relate to professionals in an area, whose goal is to look after their own and to gain profit, not after the customer, leaving us with worse products and services under the guise of improved, sometimes with older versions no longer repairable as different, not better, versions or products are produced.

The libel and slander laws arguably chill free speech and should be ruled unconstitutional too. It allows the rich, powerful and well connected to sue truthful talkers into oblivion, or pay victims off in arbitration as they continue to harm others with products that break, kill or harm health, with no real correction from the courts.

To entangle the religious groups with this government corruption which benefits officials' pecuniary gain at the cost of losing freedom by protections under the law, would exacerbate the unholy-union of church and government to the

detriment of substantially burdening my free exercise of religion, speech and association more, especially with the threat of law suits in state courts under libel per se laws concerning business performed under the guise of religion to serve business greed, the mark of the damned, the whore, the beast. See Exhibit A, 157-211.

There is an increasing risk beneficial, just programs, like Medicare, Social Security, and welfare will be reduced, eliminated, or replaced with charity seen by churches or businesses for tax breaks, marketing or favors, I believe, misleading many more to hell by teaching them to love money driving out their love for humanity. (See Matthew 6:1-4). (Also see, Exhibits relating to my desire for just laws that care for the people, not exploit them to serve the profit of those with power, money and connections to increase the same at the common man's expense. Exhibit F at internal exhibits 43 and 46.

I studied education when I was at UD, and learned like many teachers B. F. Skinner's deceitful psychological theories. Exhibit F, Exhibit 43. He taught people merely conditionally care. They behave like loveless beasts, for rewards and avoidance of harm, what I believe is the mark of the damned, the beast, the whore, the unsaved. B. F. Skinner taught there is no such thing as unconditional love. B. F. Skinner is wrong. Jesus Christ teaches otherwise. I believe Jesus. I believe, but for B. F. Skinner's words many continue on the darkened path to eternal death,

well beyond his life time. Just like I believe many will be misled to hell beyond Trump's life time if the Courts do not place a check on the executive branch, to prevent lawlessness from reigning, everyone for themselves, their own, without regard for others, the horror, reflecting the image of Satan, "the lawless one." 2 Thessalonians 2:8-10.

One of the leading causes of death in middle school and high school kids is suicide, because teachers are taught to teach students to be workers and consumers, instead of teaching them they are valued and loved and to love one another, not to exploit each other to serve greed and gain, to somehow be worthy of love. (I believe reflecting the image of Satan). I believe people exist because they are loved period, and it is a great sin to harm their life, health or eternal life to serve business greed by barter or exchange. Exhibit A at 318.

I am disappointed in both the legislative branch and the executive branches. I believe they fail to check and balance each other since they appear to be focused on those who serve their seats.

The court should put its foot down, like a loving parent, to correct their misbehavior, to balance the branches out by recognizing, not ignoring, constitutional limits. To alleviate both the executive and legislative branches from oppressing the masses through unjust decrees or for bailing out businesses for bad

business, without strings attached, based on potential bribes called campaign donations or fundraising, the Honorable Court may consider removing the Matthew 6:1-4 violations which is the source of injustice, in a different case, by removing campaign financing and fundraising period, as a violation of 18 USC Section 201, and possibly the Thirteenth Amendment, since it enslaves the masses to pay off money used to buy support for their seats via business, not for profit and charitable bailouts without strings attached to serve.³ This Honorable Court has the power and authority, albeit in a different case, to remove the temptation of government officials to slaughter, (cutting the fat off of their labor), the sheep, (the constituents), they are charged to shepherd, (care for), in terms of requiring exploitation of their labor, and their pockets, to feed themselves and those who serve their seats, misbehaving like wolves. See Exhibit A, 91, Ezekiel 34:1-10,

³ I went through the painstakingly tedious ordeal of contacting representatives at the Department of Elections in all 50 states and districts to seek a waiver in case I should run for President, about two years ago, after I lost a state election. No state helped me with the exception of suggesting I collect signatures which also violates Jesus's teachings. See Exhibit B, refer to Exhibit 2 for an elaboration on how collecting signatures serves sin and leads to harm here. I tried to see if I could run for executive or legislative office without selling my soul to Satan, but failed. See, Exhibits F, Exhibits 50, and 51. So, here I am, asking you for help because I am helpless in seeking justice through the other two branches, at this time.

I also drafted articles of impeachment and contacted all 541 federal congress members, but failed persuading them too. I believe not giving up is the winning strategy, per Jesus's teachings. See, Matthew 7:7-12, Luke 11:5-13, Luke 18:1-8, Galatians 6:9.

Zechariah 11:17, Jeremiah 50:6, Isaiah 53:6, Jeremiah 5:31, Jeremiah 23:11-15, Isaiah 9:16, and Isaiah 3.

On an aside, I am licensed to teach. Like many teachers I had to learn various behaviorists' and psychologists' theories, most of which violate my faith in Jesus to make profit off of those in pain, under the guise of good. Psychologists negate free will by environmental, chemical, behavioral, hereditary or familial causes of alleged mental illness, discouraging the use of the power we all have to use our mind to exercise free will, by teaching it does not exist. See Exhibit F, Exhibit 43, refer to my college transcript including psychology courses.

Instead mental health professionals appear to serve the way to hell by focusing on guiding people to feel better instead of allowing the holy spirit to make them feel bad to convict them to Godly concern, to think, to analyze, not ignore, to care, to love, when they see oppressors and businessmen behave like buzzards pecking at the flesh, the pockets and labor of others to serve their own family, and own people. The natural man reflects the image of Satan to be damned to hell. The spiritual man reflects the image of God by using their brain to think, to care, to love, God, themselves and one another more than convenience, greedy gain, gluttonous materialism, and good times. ⁴ See, 1 Corinthians 2:1-16 for a

⁴ There is a difference between worldly worry and Godly concern Matthew 6:25, Matthew 6:19, Luke 12:5.

discussion of spiritual verses natural man, Also See John 3:1-14 concerning Jesus's teachings on being born again, by spirit.

Theories of psychologists tend to numb the pain, as if the pain of unhardening your heart is the sickness instead of the cure for eternal life, exacerbate people's pain for profit like Sigmund Freud, and teach there is something wrong with people when they are sad at evil, when the Bible teaches there is something right. They are the only ones spared from the second death. See Ezekiel Chapter 9:3-6, Matthew 5:4.

On or about November 2, 2020, the Master filed a final notice of recommendation to dismiss my complaint as legally frivolous relating to standing. (D.I.81, Also see, Exhibit G, Docket Entrees and Exhibit H Appendix, Table of Exhibits to ascertain which documents I cite).

STATEMENT OF THE FACTS

This case arises upon President Trump's use of religion to govern as President, in his official capacity, not only in violation of the Establishment clause of the First Amendment of the US Constitution, the Equal Protection component of the Fifth Amendment, and 42 USCS § 2000bb- § 2000bb 4, but also in violation of the religion his actions purport to support thereby, I believe, misleading people I love to hell, and substantially burdening my free exercise of religion, while acting under the color of the law as President of the United States. See Exhibit A, 157-292, relating to Trump's misbehavior violating God's law under the guise of Godliness, including but not limited to tempting people to destroy the environmental harm. ⁵ See, Exhibit A, 236-292, Exhibit B, Exhibit 8, Exhibit F, Exhibit 45, relating to the environment.

⁵ Pursuant to Genesis 2:15, man is charged with the duty to care for the Earth. Revelation 11:18 teaches God will destroy those "who destroy the earth." I believe, meaning destroy in hell. It is wrong to teach folks the way to hell via unconcern towards the environment and towards one another for comfort, convenience or coins, under the guise of heaven.

I am a Christian. I believe in God revealed to me through the father, Jesus and the holy spirit, including the holy spirit shown through people in the Bible who freely, willfully chose to do God's will above their own. See Exhibit A.

Since I do not support Trump, and claim to be a democrat, people have accused me of not being a Christian which breaks my heart and substantially burdens my free exercise of religion by leaving it restrained and at times unexercised, but for Trump's incitement towards perceived, projected manufactured dissidents, including liberals like me, as antichrist.

God is the most important thing in my life. I place pleasing him, above my own desires and the desires of mere people.

Trump's pimping out my God for his government gain foreseeably upsets me and others with firm religious beliefs that conflict with his, to the point it is affecting my health, and likely the health of others. I have no freedom to speak, associate or belief if Trump foreseeably sickens or kills me of a broken heart because of his government-religion, a.k.a. government-party-religion.

My heart hurts merely listening to Trump use my God for his own vanity, while wearing his cloak of government authority. My blood pressure has unexpectedly increased to the point it poses a danger to my life. See Exhibit F, Exhibit 52.

I believe Trump misleads many to harm and hell, under the guise of heaven by manufacturing the illusion loyalty to his administration or the Republican party is loyalty to God, and that supporting ideas which conflict with Trump or his party is antichrist. As a direct, intentional result, Trump incites people to persecute democrats, including and specifically me, a liberal, democrat, as antichrist, often leaving my free exercise of speech, association and religion left restrained or unexercised.

In a course of conduct, collectively referred to herein as an “unholy-union” of “government-religion,” Defendant creates the illusion of supporting Christianity or accepting the support or backing of God or Christianity, while acting under “the color of the law,” thereby inherently, under the threat of the cloak of government authority, suppressing the free exercise of other different beliefs, than the religious beliefs, the government through its agent Defendant appears to support, including my belief in Christianity, thereby I believe, misleading people I love to hell, and destroying separation of church and government, making us all less free, including but not limited to:⁶

⁶ Under “the color of the law” language is included in the statute waiving sovereign immunity for injunctive and declaratory relief against Federal agents like President Trump. 5 USCS § 702.

1. The appointment of personal spiritual advisor, and alleged Christian leaders to advise the President, creating the appearance of support for Christianity, or religious backing of Defendant's government authority. Exhibit A, 293-298, Exhibit E, Exhibits 27, 28, 29, 41.

2. Holding up a Bible in front of a church for a photo op after people were gassed in response to their Constitutional exercise of affiliation and speech at a protest, making my God appear to approve violence, when Jesus teaches against violence, with no exception for government. See Exhibit A 299-319, Exhibit E, Exhibit 30. Matthew 5:38-39, Matthew 26:52, Genesis 9:5, Psalm 11:5.

3. Trump hypocritically claims "Biden will hurt the Bible," after Trump held up the bible for his own vanity earlier this summer, hurting the meaning of the Bible by glorifying himself in place of God. Exhibit A 320-321, Exhibit E, Exhibit 42.

4. Trump persecutes people who exercised their freedom not to worship, by demeaning those who omitted the word God in the pledge of the allegiance, while Jesus teaches people misbehave by praying seen and using God's name in vain, for political vanity. Loyalty to government party is not loyalty to God, even if leaders misbehave by citing God to support their own glory. Exhibit A 322-328, Exhibit E, Exhibit 31.

5. Trump improperly shared his alleged prayer to God, while acting under the color of the law, creating an appearance of a connection to my God. See Exhibit A, 329-335, Exhibit E, Exhibit 32.
6. Trump created the illusion there is a war on Christmas, by liberals like me.⁷ Exhibit A 336-347, Exhibit E 33.
7. Trump created the illusion he may be the chosen one by God. Exhibit A 348-353, Exhibit E, Exhibits 34, 35, 36.
8. Defendant moved the US embassy in Israel to Jerusalem for a religious group, Evangelicals. Exhibit A 354-355, Exhibit E, Exhibit 37.
9. Trump sponsors and incites private persecution towards liberals by churches and its parishioners, buying loyalty by barter or exchange, even by praise, for a little something down the line, such as bailouts, or power to persuade politicians, at the cost of teaching some preachers and parishioners to persecute non-Trump supporting liberals like me, and including me. See Exhibit A 356-371, Exhibit B, Exhibit 9, Exhibit E, Exhibit 38-39.

⁷I believe the traditions of men, societal peer pressured holiday giving is not based on unconditional love, but conditional caring, giving to get. Mark 7:8, Mark 7:7-9, Isaiah 1:13-15. I believe man-made holiday traditions such as Christmas mislead people to hell by replacing love, God, in the hearts of men with the deception business greed, gluttony and good times is love. 1 John 4:16 "God is love."

10. Defendant tweets fabrications making it appear democrats like me are attacking the church including the tweet. "DEMS WANT TO SHUT YOUR CHURCHES DOWN, PERMANTLY. HOPE YOU SEE WHAT IS HAPPENING. VOTE NOW." Exhibit F, Exhibit 44.

11. Defendant uses his son to serve his government seat by persecuting me by persecuting Democrats as non-Christians, manufacturing a fictitious threat that liberal democrats like me oppose freedom of religion, with the intent to incite Trump's supporters to demean people like me, resulting in such persecution. Eric Trump says that his "father 'literally saved Christianity...there is a full war on faith on the other side, (meaning my democrat side). (Eric continued), 'The Democrat Party, the far left, has become the party of atheists, and they want to attack Christianity'" Citing, Exhibit F, Exhibit 49.

12. Trump signed the Executive Order which increases the temptation for government employees, including the President, to back religions financially or otherwise, in hopes to receive their backing and support in return.

Trump intensifies the unholy-union of church and government, not based on freedom but bought or bartered for whoredom of my God's name, under the façade of freedom, by exacerbating tensions relating to sex, place of origin, disease, death, religion, race, and economic strains instead of alleviating them, thereby increasing

temptations for people to sin by giving into fear, which drives out love, misleading people to hell under the illusion of government godliness. See Exhibit A, 18-292.

Trump teaches the gospel of greed, gluttony and good times leading to harm and hell under the guise of heaven or good, when it serves sin, giving into temptation. 3. ⁸

Trump whores out church to serve selfish gain reflecting the image of Satan by encouraging death in this life under the guise of godliness by encouraging people to go to church. See, Exhibit 47.

Satan brought death into the world, as Trump brings death to people in this world by increasing temptations to exacerbate the health risks during the pandemic. Wisdom 2:23-24, Hebrews 2:14, Romans 5:12.

The church is not a building, but the body of Christ is humanity. God will destroy those who destroy his temple in hell, meaning other people, regardless of race, religion or place of origin. 1 Corinthians 3:16-17, In this case God may destroy ignorant people, preachers, and Trump by increasing the probability of

⁸ I reserve the right to use harsh language under the edification exception in the Bible, and the truthful language requirement in Court. In Amos, the Prophet called exploiting wealthy ladies, “fat cows.” Amos 4:1. Additionally, more than one profit called people they hoped to correct and save, whores or prostitutes. For example, see Ezekiel 16:34, Jeremiah 3:1, Leviticus 17:7 and Judges 8:33. Prophets called God’s beloved people “wild asses” too. Jeremiah 2:24 and Hosea 8:9.

their sickness and death during the pandemic to serve the tithing of churches, and government gain through such manufactured dissention to serve government gain under the guise of godliness in this government-religion of whoring my God for government gain.

Jesus scolds the religious leaders for worshipping God in vain, meaning for their own will, their own vanity in place of God's. Mark 7:7-9.

Trump tweeted a lie by tweeting, "Dems want to shut down churches permanently." See Exhibit F, Exhibit 44.

I do not want the churches to close permanently. I use my free will, my brain, to think, to care, to love others, by supporting measures that will decrease the temptations for people to get sick and die under the guise of godly-government by eliminating desperate conditions, instead of exacerbating them for business gain.

Trump's unholy-union creates the illusion that Republicans, his party is loved by God, and liberals and democrats like me are not loved by God, when God loves everyone, even non-Christians. I am not hated by God because I am an imperfect person with a different religious or political view than Trump or his claimed party. I believe God loves everyone, even though not everyone accepts God's love and salvation from eternal death.

The President must not be permitted to share religious beliefs, under the color of the law, while wearing the cloak of government authority, and bearing its might, as such unconstitutional speech inherently threatens people with different beliefs, including me particularly and individually. His rights must be deemed more limited in order not to suppress, eliminate my freedom under the threat his words cause others to persecute me directly.

I am not an antichrist just because I choose to be a member the Democratic party.

I believe some Republicans are misguided by misbehaving dead men in the federalist organization who desire lawlessness to reign under the guise of the law, but in truth reign by those with power, money or connections like them.

They teach if it is not written, it is not law. What is written is often by lawmakers selling their work to those who serve them instead of caring for those they are charged to serve, tempting them to draft unjust decrees, that reward misbehavior. business greed, driving out love for one another, or making laws unenforceable for the common man without money, power or connections.

Essentially enslaving the many to bondage of serving the wealth and convenience of the few in violation of the Thirteenth Amendment.⁹

I have righteous Godly anger towards the thoughtless words of “twice dead” men who teach lawlessness is the law, teaching others to reflect the image of the Devil, the “lawless one,” misleading them to destruction in hell under the guise of Godliness and government. Citing, Jude 1:12, meaning damned in the second death too. We have freedom of religion in the US, not a government-religion which pimps out the name of my God for government gain. Also citing, 2 Thessalonians 2:8-9 regarding “lawless one.” See, 1 Corinthians 2:15.

Lawlessness is not freedom it is reign by those with money, power and connections, without restraint, called laws, to prevent them from exploiting the people they profess to serve, to instead serve themselves.

Trump and future government agents should not be permitted to teach the way to hell under the guise of heaven, while acting under the color of the law by

⁹ I believe the Courts have the power to save souls by just decrees, just laws, and justice in the courts teaching love for one another, and correcting folks when they hurt one another for their love of money. I see Courts as potential heroes, eternal life savers, and life savers here on earth. I believe Courts misbehave and become life takers when they value money, power and connections more than the humanity they serve and guide. For an example of a heroic judge, Justice Holland called me up and tried to save Delaware with regards to misbehavior relating to title insurance, but he retired before saving the day. Citing, Exhibit F, Exhibit 46.

the unholy-union of government-religious power. Many people rely on those in government authority, seeking guidance and obedience in all matters government agents exert public influence upon, including matters of faith, an area our Constitution forbids government partiality.

The Honorable Master misstates one of my legal theories. I do not allege Trump creates the appearance of being “a devout Christian” as the Honorable Master opined. I allege the President creates the illusion of having the support of God, as appearing as a “God head,” and, or creating the illusion that supporting Trump supports God or my religion, Christianity, and, or inversely, not supporting him somehow suppresses my own religion or makes me into an antichrist or not a Christian.

People have accused me of not being a Christian since I do not support Trump. Exhibit A 19, 20. People have accused me of not being a Christian because I do not ignore Trump’s lawlessness and misdeeds, and the victims of his sins, despite the commands in the Bible to rebuke, love like Jesus by such discipline. to correct, with mercy, to prevent condemnation in hell and harm towards victims of Trump’s sins. See, Matthew 4:17, Luke 13:5, “...unless you repent, you too will all perish,” Mark 6:12, “They went out and preached that people should repent,” Hebrews 12:6, Deuteronomy 8:5, Revelation 3:19, Colossians 3:16, 1 Corinthians 4:14, and 2 Timothy 4:2.

People have accused me of not being a Christian since I am not a member of the President's party, the Republican party.

Just recently in early November, 2020, a woman said I could not be a Christian if I supported a party that supported abortion. I gently discussed the fact, I do not support abortion and even mentioned it before God and man that I do not support abortion or the death with dignity act, because I believe it is wrong to encourage people to kill themselves or others, die and go to hell, in my Complaint against the Democrats. See Exhibit B, Exhibit 2. I want people to live and have eternal life, not die for dollars, delights, comfort or convenience.

In October 2020, I went to the Target and chatted with a man as his wife listened, and we discussed God. We both claimed Jesus Christ. He mentioned his support for "God, county and his party," during the discussion.

I indicated that I supported God, but did not support President Trump. He said "we are done here."

Other strangers have told me I cannot be a Christian and a democrat. Other times, strangers' faces become distorted like a gremlin, ugly, angry frowning with disapproval, when they discover I am a democrat, conveying their views without words, making me hesitant to continue to speak forthrightly concerning important matters. My religious exercise includes speaking and interacting with people on

important matters, teaching them they are loved and to love one another, regardless of race, religion, diverse belief or place of origin. My free exercise has been substantially burdened by Trump's encouragement for church leaders and republican political leaders to demonize liberal-democrats like me, as alleged antichrists, because of the unholy-union of the church and Republican governing party Trump has exacerbated to serve business greed, the mark of the damned. ¹⁰

In turn demonization of people in my position is encouraged by followers of Trump, Republicans and churches, where preachers teach liberals and Democrats, like me, are not Godly, and Republicans are.

Just November 20, 2020, I spoke with a man who said the mark of the beast was written on the Biden Harris signs on the bottom. I said I disagree, but applaud him for looking into political and religious matters. He said I can't talk to you.

¹⁰ The mark of children of the devil is absence of love. Christians are known by their love. John 13:35. I believe unsaved people, children of the devil, glorify the punishment and the fruits of the punishment, such as death, martyrdom, marriage, sex, child bearing, business, money or gain by barter or exchange, reflecting the image of Satan by pride, glorifying self, living for self-gain, instead of receiving edification from God's discipline to learn humility and trust in God to gain salvation, not glorifying man in place of God. See Genesis Chapter 3 concerning the punishments for original sin.

I think open discussions, learning the other side, makes us smarter and freer. Trump's unholy-union has shut down free discussion under the threat of government sponsored private or public persecution.

The Executive Order increases the temptation for both Democrat and Republican government agents to grant government support for a religion backing the government agents or the government, creating and, or maintaining a government party backed religion. I notice President elect Biden inappropriately uses his religious faith for his own vanity, political gain, too. With the acceptance of governing authority, government agents have reduced freedoms in the form of limits to prevent the government from reducing the freedoms of those they serve.

The Honorable Master correctly states that I am injured by the loss of eternal lives of others. It is my worst nightmare that Trump created a government-religion, and government-religious belief, under the guise of government and God, which I believe leads people to mark their foreheads by what they think about and their hand by how they live with the mark of the beast, the mark of the damned, under the guise of salvation, via business greed, by barter or exchange, merely conditionally caring, with no God in them, for God is love, unconditional love. Exhibit. A 79-96, 109, 113, 318, and 1 John 4:16.

I do not want people I love to harm one another to serve their own, die to be damned on judgment day, all the while thinking they are doing good, when they do evil.

I am horrified by Bible boys gone wild in my home town, and businesses like Hobby Lobby and Chick Filet, pimping out my God like a Mickey Mouse mascot to serve their profit under the guise of Godliness, teaching what I believe is the mark of the beast is the way to salvation.

The deception of accepting the mark of the beast in your heart, love of money, or bought or bartered for material gain, driving out unconditional love for humanity, under the illusion it somehow protects you from the mark of the beast troubles me. I care about other people. Per the Bible, people go to hell because of their confusion, and for misunderstanding. See, 2 Corinthians 4:4, and Matthew 13. I am called to help the blind see by shedding light, God's Word on other's feet, as a born-again disciple of Jesus. I believe the government-religion contributes to this deception as truth, misleading many to harm and hell.

Deception destroys people in hell. It is horrifying to observe Defendant's exploitation of religious belief of his and or his party's projected God ordained Government power. Defendant's self-serving deception is not worth the cost of souls or the cost of making us all less free to worship or not according to the

dictates of our conscience with the inherent threat a government-religion creates against such exercise.

Catholic charities whores my God's name for business too. True charity is done unconditionally, not for a salary or paycheck, per Jesus Christ. In real life we can get sued for libel per se for honestly criticizing businesses, even religious businesses. Libel and slander laws are unjust decrees, silencing truth, free speech, for a buck. That is not freedom of speech, but whoredom to business greed. I am so angry as more people are dying to be doomed to hell under the deception of the Donald's direction towards dollars, and distracting delights, while encouraging hardness of hearts towards one another, the sin against the Holy Spirit. I feel so sad, some people think serving sin is serving God, and somehow my Godly, as opposed to worldly concern about Trump's unholy-union, is lack of my faith in Jesus, instead of living faith.

While businesses, churches, even my Catholic Church are free to misbehave by pimping out religion, Jesus's name and one another, trading favors, selling labor, themselves, their own souls, for a buck, under the guise of Godly love to serve their desire for the Almighty dollar under the guise of religion, the Government, and particularly President Trump is not free to support some religious organizations, religions, financially or otherwise, while demeaning other religions and manufacturing deceit such as accusing liberals like me as wanting to get rid of

God. I choose to lay down my life for God, even if I appear a fool before the world.

The Honorable Master mistakenly assumes she must determine who goes to hell in order to assess whether I am injured. The Honorable Court must not determine whether my beliefs are true regarding damnation.

The Court must merely determine whether my beliefs are sincere and genuine, and that this government created religion I believe I am under, but for Defendant's unholy-union, conflicts with my beliefs, and substantially burdens my exercise of fundamental rights, including the right to exercise my religious faith according to the dictates of my conscience, not the dictates of the Defendant, without threat of government sponsored public or private persecution for exercise of such beliefs.¹¹ See Exhibit A, B regarding my religious beliefs, and exhibits C,

¹¹ 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

D, E, F regarding increasing desperate conditions to increase temptations to violate my religion, to sin, under the guise of Godly government.

With regards to my belief people are deceived by the Donald to be damned to hell should they remain under the deception of his manufactured government-religious beliefs, that goes to the severity of the burden upon me, and to causation relating to why I am persecuted. I teach the opposite of Trump, sacrificial love, not self-serving exploitation of outsiders to serve yourself and your own at the expense of harming others, under the guise of Godliness.¹² Some people think I am antichrist since I do not support Trump's government sponsored religion. My

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.

¹² *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 134 S. Ct. 2751, 189 L. Ed. 2d 675 (2014), “The “exercise of religion,” for purposes of the Free Exercise Clause and RFRA, involves not only belief and profession, but the performance of, or abstention from, physical acts that are engaged in for religious reasons.”

free exercise is chilled, and is left unexercised as a result of Trump's unholy-union of government-religion as a direct result of Trump's influence upon some of the people he misleads. Exercise of my religion is living faith, teaching the word not merely concerning the bible and God, but also teaching people about repentance and the way of love. They are loved by God. Others are loved by God too. It is wrong to harm other people God loves to serve your own or your love of money, no matter what the Trump religion sells people. My God is not for sale.

I confess I care about other people's lives, health and eternal lives. I love people, and do not desire they die to be damned to hell. Yet, elimination of my First Amendment freedom is considered irreparable for purposes of injunctive relief, even if establishment of religion misleading and deceiving people I love to harm and hell is not by this court. See, *Fulton v. City of Philadelphia*, 320 F. 661 (E.D. Pa. 2018), aff'd. 922 F.3d 140 (3d Cir. 2019), cert. granted sub nom. *Fulton v. City of Philadelphia, Pennsylvania*, 140 S. Ct. 1104, 206 L. Ed. 2d 177 (2020).

QUESTIONS PRESENTED

I. Whether I established standing to continue this cause of action by alleging, 1. I suffered an injury in fact, an invasion of a legally protected interest; 2. a causal connection between the injury and the conduct complained of, the injury has to be fairly traceable to the challenged action of the defendant; and 3. it must be likely, as opposed to merely speculative, that the injury will be redressed by a favorable decision.

1. Injury in Fact.

A. First, does the President's unholy-union of government-religion by his policies and Executive Order run afoul of the prescribed tests for violation of the Establishment Clause of the Federal Constitution, the Fifth Amendment Equal Protection Component, and the 42 USCS § 2000bb 1-4?

Second, if so, does the President's excessive entanglement of religion and state, the unholy-union, constitute a legally recognizable burden, a legal injury, on my Constitutional right to freely exercise my religion, speech, and association as a Christian liberal democrat?

Third, if my right to freely exercise my religion and association as a Christian Democrat is legally burdened (legal injury), is such burden justified by a compelling State interest?

2. Causation

A. Whether Plaintiff shows a causal connection between Trump's actions and the substantial burden on Plaintiff's free exercise of religion, since the alleged suppression of her free exercise of religion, in the form of persecution, was inflicted by persons other than Trump in response to Plaintiff's lack of support for President Trump or his choices, membership in the Democratic party, or support of a Democratic views, while maintaining her faith in Jesus Christ. (See, the D.I. 81, Final Report, Foot note 28).

B. Second, whether Plaintiff actually, and demonstratable suffered, suffers and continues to suffer a substantial burden, but for the President's excessive entanglement of religion and governing political gain.

3. Redressability.

Whether judicial relief would alleviate the burden upon Plaintiff's free exercise of religious beliefs.

II. Whether my case falls under the exception to mootness doctrine for matters of public importance that are capable of repetition but evading review.

III. Whether this dispute qualifies under another exception of the mootness doctrine, as capable of repetition but evading review.

IV. Whether dismissal of my case would deny me of access to the courts to address my fundamental rights, and whether this Court must grant me leave to amend to address shortfalls in the Complaint.

ARGUMENT

I. I established standing to continue this cause of action by alleging, 1. I suffered an injury in fact, an invasion of a legally protected interest 2. a causal connection between the injury and the conduct complained of, the injury has to be fairly traceable to the challenged action of the defendant; and 3. it must be likely, as opposed to merely speculative, that the injury will be redressed by a favorable decision.

1. Injury in Fact

A. The President's unholy union of religion and government through his policies and Executive Order run afoul of the prescribed tests in violation of the Establishment Clause of the Federal Constitution, the Fifth Amendment Equal Protection Component, and the 42 USCS § 2000bb 1-4.

In *Fulton v. City of Philadelphia*, 320 F. Supp. 3d 661, 690, 2018 U.S. Dist. LEXIS 116866, *57-58, 2018 WL 3416393, the Eastern District Court of Pennsylvania held, "The Supreme Court has provided two tests for deciding whether government action runs afoul of the Establishment Clause: the "endorsement test" and the Lemon test." Citing, *Doe v. Indian River School Dist.*, 653 F.3d 256, 282-83 (3d Cir. 2011).

The Defendant violates the Establishment Clause under both tests. Under the Lemon test, the Executive Order must be for a secular purpose. Gaining support of religion-based organizations to be tempted to support those religious groups and religions, as opposed to individuals, who support them is not a secular purpose, but a self-serving purpose for government gain at the cost of making me and other Americans less free, 2. The executive Order must not excessively entangle government with religion. The excessively entangles religion and government in an unholy-whored union giving birth to government bought or bartered for government-religion under the chilling threat of persecution against those who exercise a different belief, like mine, or non-belief than the government sponsored religion, which eliminates freedom of religion to forced religion. 3. The Executive order must not have a primary effect that advances or inhibits religion. The primary effect of the Executive Order has inhibited my free exercise of religion, and advances religious beliefs that advance Trump as a God head or God backed. It's weird. People have fallen for the illusion that Trump is Godly ordained in government, in an unholy-union of church and state. Trump is exploiting and encouraging this deception to the detriment of chilling my free speech, affiliation and exercise of religion. The Executive order is unconstitutional. Under the guise of protecting freedom of religion, it is eliminating freedom by selling it to only those who can pay.

In, *Trump v. Hawaii*, 138 S. Ct. 2392, 2399, 201 L. Ed. 2d 775, 779, 2018 U.S. LEXIS 4026, *1, 86 U.S.L.W. 4602, 27 Fla. L. Weekly Fed. S 503, 2018 WL 3116337, the Supreme Court held:

“The First Amendment provides that Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof. Judicial precedent recognizes that the clearest command of the establishment clause is that one religious denomination cannot be officially preferred over another.”

The President clearly prefers his and his party’s alleged, manufactured, perceived or adopted religious-government beliefs over my belief in Jesus Christ, as a liberal, Christian democrat. See Exhibit E, Exhibits 10, 11, 27-29, 31-39, 41-42.

The Executive Order clearly tempts government officials to prefer religious organizations who support them, over other organizations with diverse beliefs or non-beliefs too.

In fact, since the executive order was implemented, I have noticed an increase in the number of preachers online bad-mouthing liberals like me as not following Jesus, which makes me sad. People in my home town tend to listen to some of these preachers. People in my home town in turn bad mouth democrats like me as antichrists, which makes me sad. Some people in my home town make jokes that are no laughing matter because they go beyond jokes to beliefs.

“The Establishment Clause of the First Amendment restricts government capacity to favor a religion, or religion in general, (in the form of limits).” *Brown v. Borough of Mahaffey*, 35 F.3d 846, 850, 1994 U.S. App. LEXIS 27407, *10-11.

“The Establishment Clause forbids ... the preference of a religious doctrine or the prohibition of theory which is deemed antagonistic to a particular dogma.” *Kalman v. Cortes*, 723 F. Supp. 2d 766, 769, 2010 U.S. Dist. LEXIS 65171, *1, 39 Media L. Rep. 1039.

“The Establishment Clause prohibits government from establishing a religion in the sense of sponsorship, financial support, or active involvement of the sovereign in religious activity.” *Id.*

The Executive Order’s impact in fact tempts government leaders to support religious institutions in terms of bail outs, with the hope or expectation of loyalty in the form of verbal or financial support. See Exhibit E, Exhibits 38-39.

“The very adoption or passage of a policy that violates the Establishment Clause represents a constitutional injury.” *Kitzmiller v. Dover Area Sch. Dist.*, 400 F. Supp. 2d 707, 708, 2005 U.S. Dist. LEXIS 33647, *1.

The Executive Order and Trump’s policy of persecution is a constitutional injury.

The Constitution does not grant Trump a license to demean those with diverse political and religious beliefs like me.

Nevertheless, the President attacks liberal-democrats in general terms, liberal-democrats like me, villainizing me in the eyes of some of Trump's supporters, and people who appear like me, by deceit, saying we want to take away God and the Bible, in utter disregard for Constitutional limits upon his power.

I do not seek to take away God or the Bible. The Word of God is in my heart. I seek to live it with the strength of the holy spirit through me, by spreading truth and seeking justice with mercy, for correction to prevent condemnation and harm in life here too. See, Matthew 23:11, regarding greater commands of "justice, mercy and faithfulness," more important than monetary or material laws per Jesus. Also see, John 3:21, 1 Thessalonians 2:4, John 12:43, Acts 5:29, regarding obeying God's will, not our own will or other people's will, which leads to harm in this world and damnation.

Yet, Trump has impassioned some republicans to believe liberal-democrats like me are antichrists directly causing a substantial burden upon my free exercise of religion when I interact with them. I believe I am the Word when I lay down my life to do God's will, in place of my own worldly desires. It is not me, but God through me, through the guidance of the Holy spirit which reminds us of Jesus's

teachings. 2 Corinthians 3:2-3 provides, “You yourselves are our letter, written on our hearts, known and read by everyone. You show that you are a letter from Christ, the result of our ministry, written not with ink but with the Spirit of the living God, not on tablets of stone but on tablets of human hearts.” Exhibit A, 389. See, John 14:26, Jesus said, “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 said to you.”

Yet, strangers stop interacting with me concerning God, when they discover I am a democrat. Some accuse me of not being a Christian which makes me heart break.

I am ashamed to God to admit at times, I even withhold my speech concerning the Word of God when I listen to people’s insults towards people like me, their glorification of the business greed and family under the guise of God and the Republican party, and Trump, “as the best thing that (they say) ever happened to our country.” They do not know I think otherwise. Since they persecute those who believe as I do, I am sadly increasingly silenced.

The government sponsored public and private distortion of the bible and God to serve government, in place of God, or under the guise of God, including the vanity of Trump, as President, and the Republican governing party, substantially

burdens my free exercise of religion, speech and affiliation, based on my diverse belief. My free exercise has been chilled, restrained, and not freely exercised, but unexercised, as a result of such deception of a God backed party and religion, based on excessive entanglement of religion and government.

By the collective behavior forming the unholy-union including but not limited to the behavior above, Trump also violates the Establishment Clause under the Endorsement test.

In *Kitzmiller v. Dover Area Sch. Dist.*, 400 F. Supp. 2d 707, 708, 2005 U.S. Dist. LEXIS 33647, *1, the U.S. District Court for the Middle District of Pennsylvania held:

“As the endorsement test has developed through application, it is now primarily a lens through which to view "effect," with purpose evidence being relevant to the inquiry derivatively. The United States Supreme Court has instructed that the word "endorsement" is not self-defining and further elaborated that it derives its meaning from other words that the court has found useful over the years in interpreting the Establishment Clause. The endorsement test emanates from the prohibition against government endorsement of religion and it precludes government from conveying or attempting to convey a message that religion or a particular religious belief is favored or preferred. The test consists of the reviewing court determining what message a challenged governmental policy or enactment conveys to a reasonable, objective observer who knows the policy's language, origins, and legislative history, as well as the history of the community and the broader social and historical context in which the policy arose.”

The message of the challenged conduct, Trump's policy of persecuting perceived, projected or manufactured non-religion or a false "war on religion," based on my political affiliation, as a liberal-democrat endangers my life, and my free exercise of speech, affiliation and religion, under the threat of government sponsored public or private persecution, social, economic, violent or otherwise.

A "reasonable, objective observer who knows the policy's language, origins, and legislative history, as well as the history of the community and the broader social and historical context in which the Trump's policies and Executive Order arose would understand the purpose of Trump's message is to persecute non-Trump supporters on religious grounds, while garnering religious support for his governing position. Id.

The effect is Trump succeeded to do both with a section of our population.

Trump's purpose of government-religion is to gain support for himself and the Republican party, those who support him, thereby supporting himself. Trump also purposely exploits the name of my God to demean liberal democrats including me as antichrist, to serve his government power based on religious persecution.

Defendant creates the illusion that liberals like me are Godless, raging war on Christianity, with the purpose of inciting part of his base to demean liberals

such as and including me. Some people believe Trump. Thereby they persecute me as Godless.

The Third Circuit Court of Appeals held,

“Neither a state nor the federal government can set up a church. Neither can pass laws which aid one religion, aid all religions, or prefer one religion over another. Neither can force nor influence a person to go to or to remain away from church against his will or force him to profess a belief or disbelief in any religion. No person can be punished for entertaining or professing religious beliefs or disbeliefs, for church attendance or nonattendance. ... Neither a state nor the federal government can, openly or secretly, participate in the affairs of any religious organizations or groups and vice versa.” *Doe v. Indian River Sch. Dist.*, 653 F.3d 256, 259, 2011 U.S. App. LEXIS 16121, *1.

The United States through Trump set up a Trump/Republican form of government-religion whose policies both verbal and economic prefer those religious heads and organizations who may help their election seats.

In *Salvation Army v. Department of Community Affairs*, 919 F.2d 183, 185, 1990 U.S. App. LEXIS 19352, *1 the Third Circuit held,

“Association for religious purposes is in some circumstances protected by the second sense of freedom of association, the freedom of expressive association. An individual's freedom to speak, to worship, and to petition the government for the redress of grievances cannot be vigorously protected from interference by the State unless a correlative freedom to engage in group effort toward those ends are not also guaranteed. According protection to collective effort on behalf of shared goals is especially important in preserving political and cultural diversity and in shielding dissident expression from suppression by the majority. Consequently, the U.S. Supreme Court has long understood as implicit in the right to engage in

activities protected by U.S. Const. amend. I a corresponding right to associate with others in pursuit of a wide variety of political, social, economic, educational, religious, and cultural ends.”

The Third Circuit further held,

“In order to present a justiciable controversy in an action seeking a declaratory judgment to protect against a feared future event, the plaintiff must demonstrate that the probability of that future event occurring is real and substantial, of sufficient immediacy and reality to warrant the issuance of a declaratory judgment. Where the plaintiff seeks a declaratory judgment with respect to the constitutionality of a state statute, even where the attack is on U.S. Const. amend. I grounds, there must be a real and immediate threat of enforcement against the plaintiff. Moreover, this threat must remain real and immediate throughout the course of the litigation. The rule in federal cases is that an actual controversy must be extant at all stages of review, not merely at the time the complaint is filed. Where an intervening event removes these conditions, the court must not address the now-speculative controversy.” *Id.*

The threat is real and immediate against me by Trump or President elect Biden, should the transfer of power take place, should this Court fail to grant injunctive, declaratory relief, including but not limited to, declaring the Executive Order Unconstitutional, and declaring federal employees more limited in their free exercise of religious speech in order not to chill the freedoms of the people they serve.

The President passed the Executive Order under the legal authority of the same statute which is the subject of this dispute, the Religious Freedom Restoration Act.

Sovereign immunity is waived pursuant to Pursuant to 5 USCS § 702 in this action. President Trump is not immune because he has **no discretion** to disobey the same statute he uses as a sword to cut through our Constitutional freedoms, that I use as a shield to protect my freedom, and the freedoms of others through me. Cf. *Corus Group PLC v. ITC*, 352 F.3d 1351, 1353, 2003 U.S. App. LEXIS 24901, *1, 25 Int'l Trade Rep. (BNA) 1865, (“Where the President of the United States has **complete discretion** whether to take an action in the first place, courts are without authority to review the validity of an agency recommendation to the President regarding such action.”)(emphasis intended).

The test for the Religious Freedom Restoration Act pursuant to 42 USCS § 2000bb-1 provides,

“(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.”

The Government through Trump has substantially burdened my free exercise of religion, with no compelling government interest or use of any least restrictive means to support such compelling interest.

The Religious Freedom Restoration Act (42 USCS §§ 2000bb et seq.), only addresses Religious claims, not equal protection claims arising from alleged unequal treatment of religious practices by government. *Tyson v. Ratelle*, 166 F.R.D. 442, 1996 U.S. Dist. LEXIS 5697 (C.D. Cal. 1996). So, Equal protections claims must be pursued under the Fifth Amendment separately.

Note, my pleading needs legal amendments relating to my equal protection claims, not relating to the legal frivolous argument proffered by the Honorable Master relating to standing.

For example, the “applicable to or pursuant to the [Fifth] Amendment” and the via the [Fifth] Amendment” phrase the Honorable Master kindly directed my attention to should be struck. (See, D.I.81, Exhibit A at 19, 355, Count I, 436-438, Count II, 450, Count III, 477). If permitted, I should either remove or revise the references to the 5th in the Counts and relevant paragraphs to plead, the President’s discriminating words and deeds selectively persecutes liberal or radical-democrats like me, based on my affiliation and religion, including accusations of non-belief, as a liberal, Christian, democrat suppressing my free exercise of religion,

association and speech, under the threat of government sponsored public and private persecution in violation of the equal protection guarantee under the Fifth Amendment, to serve Trump's government authority, without justification necessary for a compelling government interest.

“The U.S. Supreme Court's approach to Fifth Amendment equal protection claims has always been precisely the same as to equal protection claims under the Fourteenth Amendment.” *Sessions v. Morales-Santana*, 198 L. Ed. 2d 150, 151, 2017 U.S. LEXIS 3724, *1, 137 S. Ct. 1678, 85 U.S.L.W. 4337; Citing, *Weinberger v. Wiesenfeld*, 420 U. S. 636, 638, n. 2 (1975).

I believe in Jesus and do not desire to take bibles away despite the President's words concerning so called radical-liberals like me or the radical-left. Per *Wilmington Christian School, Inc. v. Board of Education*, 545 F. Supp. 440, 440, 1982 U.S. Dist. LEXIS 14188, *1 “Any classification which serves to penalize the exercise of a constitutional right, unless shown to be necessary to promote a compelling government interest, is unconstitutional.”

Trump classifies radical-liberal-Democrats like me as antichrists in an attempt to penalize my exercise of free speech, association and exercise of religion to serve his seat, and encourage support for persecution against liberal Christian democrats like me.

Trump's words incite some of his supporters to persecute perceived, projected, or manufactured dissidents, sometimes, socially, economically, or violently. Exhibit F-Exhibit 54, Exhibit E-Exhibit 7.

Trump knows words matter. That is why Trump persecuted the NFL players for their peaceful communication that it is wrong for government agents to kill little black children. The misbehaving police officers' unconscious beliefs, not using their brains to analyze, not ignore, to think, to care, to love, instead of to cowardly fear, and destroy what they fear instead of love correct and protect is not justification for the disparate of blacks within the criminal judicial system. Id. Trump instills a cowardly wimpy-ness by government employees stemmed in an unconscious fear and satanic pride, not courageous love, mercy and humility towards those with diverse backgrounds.

Trump knows words matter. That is why he persecuted the words of the press, that shed light and truth on different angles of what Trump was selling us as truth, deception. Id.

Trump knows his words matter. Trump intentionally uses his words to incite people to persecute those who disagree with Trump, including me.

Trump's words directly and intentionally caused persecution towards me, as a perceived, projected or manufactured dissident in one of the classes of folks he

chose to persecute, as an antichrist. Words become ideas. Ideas become beliefs. Beliefs are the basis of our conduct. Trump's words directly caused persecution towards me. His words matter. He knows words matter. That is why he desires to exacerbate unjust decrees such as libel laws to whore freedom of speech to sell it to enslavement of the many to the powerful, well connected, and the wealthy. See Exhibit F-Exhibit 54.

Trump violates the Equal protection component of the Fifth Amendment by persecuting me individually, as a person in a class of people he persecutes, and for exercising my fundamental rights, without compelling justification.

The Court must not ignore Trump's unconstitutional words and deeds. He is not above the law, nor below the law. Under the Constitution, his freedoms are reduced in the form of limits in order to uphold, protect and safeguard the freedoms of those he serves. With the acceptance of the cloak of government power, those in office have reduced freedom under the First Amendment in order to make the common man more equal, which is quite beautiful and humbling.

B. The President's unholy-union of religion and government, constitute a legally recognizable burden, a legal injury, on my Constitutional right to freely exercise my religion, and freedom of association as a Christian liberal democrat.

But for such unholy propaganda accepted and or customarily proffered or sponsored or accepted by government agents and employees, I am not freely, but restrictively, able to exercise my religion through association, speech and conduct to serve God by shedding light on his word upon others to guide their steps from harm, under the threat of being called unpatriotic or unchristian or ignored or persecuted. My free exercise of religion is not free, but is restrained and unexercised because of Trump's deception serving Trump and the Republican party serves God.

My injuries are real, concrete, articulable, imminent, not speculative, conjectural or hypothetical.

I do not remember anyone ever telling me I was not a Christian until President Trump ran for office. But for President Trump's unholy-union, I would not be accused of not loving God. His burden has left a deep weight on my heart. While the Court cannot eliminate the scars of his piercing words and deeds, the court may lighten the burden on my heart and unable me to more freely exercise my religious beliefs. This Court can reduce the pain.¹³

¹³ I am a little scared about compromising my physical safety in exchange for exercising my religious belief via speech and conduct, seeking justice, mercy with faithfulness, via Matthew 23:11. See Exhibit A, 95, 286, Exhibit E, Exhibits 16, 23-25, relating to evidence of Trump increasing the temptation for people to become cowardly self-protective, defensive by use of violence, instead of

C. There is no compelling government interest to justify Defendant's legal burden upon my right to freely exercise my religion and association as a Christian Democrat.

Defendant's First Amendment rights are more limited by the Constitution, reduced in order not to chill the freedoms of those Defendant serves, including my free exercise of religion, speech and association to prevent the inherent threat of persecution, his insult against alleged antichrist liberal democrats causes towards me personally, granting those he deceives a license backed by his government authority to persecute me.

courageously loving enemies. Also see, Exhibit A 210-229, Exhibits E, Exhibits 17-19 and 40, demeaning women like me as something to look at, use or do, as things instead of as people to respect. At one time I had giant signs on my car that said "Serve your county, not your seat. Impeach" and "No one is above the law. No one is Below the Law. Impeach." But strangers made comments about shooting me. I received ugly notes under my windshield relating to my political stickers. Someone threw a white substance at my car, and I received so many middle fingers by cute white-haired old ladies in their cars, as I drove, that I became scared and took the stickers off. I took the stickers off months before I filed this complaint, I forget exactly when. I am concerned about being physically harmed based on my religious and political beliefs and seek the protection from danger by this Honorable Court. An order for injunctive and declaratory relief would alleviate my concern for government sponsored private violent persecution too, based on my belief in Jesus as a radical, liberal, Christian democrat. It would reduce the persecution of diverse religious groups stemmed in government officials, including Defendant, instigating or ignoring the unrest between diverse groups, instead of uniting them as Americans.

Monetary or Trump's and Government party's self-serving gain by loyalty or otherwise by religious organizations permitted to donate is certainly not a compelling interest. Money is not speech. If money is speech, then speech is not free, but is bought or bartered for, by only those with the ability to pay.

Likewise, demeaning liberal, democrats like me, accusing people with my association, to be anti-Christian to gain support for his government authority, election, and, or party are not compelling interests to support the burden upon my free exercise of speech, association and religion.

2. Causation

A. The facts evidence a connection between Trump's actions and the substantial burden on my free exercise of religion and association as a liberal Christian democrat, even though the alleged suppression of my free exercise of religion, in the form of persecution, was inflicted by persons other than Trump in response to my lack of support for President Trump or his choices, my membership in the Democratic party, or my support of Democratic views, while maintaining my faith in Jesus Christ. (See, the D.I. 81, Final Report, Foot note 28).

The Delaware Supreme Court in, *Keegan v. University of Delaware*, 349 A.2d 14, 16-17, 1975, 14 (Del. 1975), cert. denied, 424 U.S. 934, 47 L. Ed. 2d 342, 96 S. Ct. 1148 (1976) held, "If the purpose or effect of a law is to impede the

observance of one or all religions or is to discriminate invidiously between religions, that law is constitutionally invalid even though the burden may be characterized as being only indirect." Citing, *Braunfeld v. Brown*, 366 U.S. 599, 607, 81 S. Ct. 1144, 6 L. Ed. 2d 563 (1961), quoting, at 374 U.S. 398, 404, 83 S. Ct. 1790, 10 L. Ed. 2d 965; *Sherbert v. Verner*, 374 U.S. 398, 10 L. Ed. 2d 965, 83 S. Ct. 1790 (1963).

Trump's words and deeds affect those he serves, and influences their conduct and beliefs. His words became permission for some of his followers to repeat and use towards me, as they did, demonizing me as not being a Christian because I do not support Trump or his party. I am a Christian.

Trump's words, and behavior, including persecution of perceived, projected or manufactured dissidents, (in this case, liberal democrats like me, including me, as antichrists or anti-patriotic), encourages some of his supporters to do the same, by verbal, economic, social and sometimes violent means, as I argue in the articles of impeachment relating to Freedom of the Press and freedom of speech attached hereto in Exhibit 7.¹⁴

¹⁴ Trump's persecution of the press chilled my freedom to submit newspaper articles, to live my religion. I drafted the attached Exhibit F, Exhibit 48, to submit to the papers, but changed my mind. I must safeguard the freedom of the press from further insult and potential government persecution from Trump at the cost of

The President directly caused people's words and conduct to pierce through my heart, despite the fact the President did not speak them directly to me. The president directly authorized people to cruelly persecute and demean me as unworthy to talk or associate with when they learn of my association because of Trump's shameless demeaning statements concerning liberal democrats like me.

Trump intended to instill animosity towards me and other liberal radical democrats to serve himself and those who serve him, thereby serving himself.

It is foreseeable Trump's words would encourage such a result, actual persecution towards me individually, as a liberal in a highly Trump supporting county.

The President modelled attacks against liberals as non-Christians in his official position, under the color of the law, deceiving those he misleads into thinking mimicking the President's misbehavior is good, when it is bad.

The President's words and deeds are seen as orders by some of his supporters to act. The President need only to inspire others to act as he commands, to directly injure me.

not being free to exercise my speech and belief, but leaving it restrained and unexercised.

Trump's words persecuting liberals as anti-Bible or anti-Christian, under the guise of the law, directly sponsored public or private persecution towards me, like an invisible string, puppets of his power are pulled towards persecuting me personally, as a radical, Christian liberal, democrat by Trump's words.

Trump intended to exploit his manufactured version of Christianity to incite his supporters to persecute radical liberal democrats, including me based on the deceit we, I, am an antichrist, in an attempt to serve his election seat, and power as President.

Trump's policy of intentionally inciting persecution verbal, economic, violent or otherwise, successfully abridged my free exercise of speech, religion, and association under fear of harm, even physical harm, my heart has been hurting in my chest, even thinking with tears in my eyes, about people accusing me of not being Christian because I do not support Trump.

B. I actually, and demonstratable suffered, and continue to suffer a substantial burden, but for the President's excessive entanglement of religion and governing political gain.

"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, *.

“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

I will likely continue to suffer loss of First Amendment Freedoms if this Honorable Court fails to act, even if President Trump is removed on January 20, 2020, which cannot be guaranteed despite Biden’s win.

If the actual transition from President Trump to President-Elect Biden takes place, the harm to me is still the same. Though, admittedly the wounds will be from a different government agent, by one affiliated with the same party and religion. The temptation to exploit religion to serve government gain or the President elect’s gain remains, should the Court not remove the temptation, by penalizing, not rewarding by ignoring, government religion, governing in the name of religious faith creating an unholy-union of government and religion which glorifies man in place of God, under the guise of God.

Both men use my God’s name for their own vanity, for their own government gain, using their personal espoused or projected religious beliefs to gain government authority, at the expense of exacerbating the unholy-union, of a government-party-religion, or government-religious-belief.

Biden uses religion to serve his government gain too, and misbehaves by another set of conduct not ripe for discussion.

Further, as discussed below, this case is capable of repetition and likely to evade review. It appears Trump will likely distract and delay any criminal law suits filed against him should he actually leave the white house, and run again in 2024 in hopes to be judgment proof. He will likely encourage and sponsor continuous persecution against me, and others he sees as dissidents in the future.

3. **Redressability.**

A. Injunctive and declaratory relief would alleviate the burden upon my free exercise of religious beliefs, and prevent exacerbation of my wounds as I heal.

However, I respectfully request leave to amend the Complaint to seek additional relief. The Executive Order should be ruled unconstitutional as contributing to the temptation for both Democrat and Republican leaders to establish a party-religion that serves their election seats.

The Court must allow me to argue to remove the temptation to prevent additional, foreseeable, real, imminent harm that will likely be used by those in the legislative and executive branches, to the detriment of pitting religious groups against one another, making us all less free to worship or not according to the

dictates of our own conscience under the threat of government sponsored public or private persecution.

Judges have the power to stop rewarding misbehavior by choosing to hear cases where the common man, like me, is harmed by artificial entities, the federal government, and the President. You have the power to save me, save America, and save the world. I understand the Court is only empowered if asked properly. It is not the fault of the Court should I fail.

I merely ask for the opportunity to be heard, to seek justice, knowing there is no guarantee. After all, that is what makes America great the opportunity at justice. That opportunity, not guarantee, is what makes our country already great. Justice must be fought for or injustice is guaranteed. I choose to fight, with words not weapons, to maintain, and preserve our imperfect system of checks and balances, which affords correction, with mercy, to uphold, not destroy, the three branches when people within them abuse and misuse power for self-gain and glory, at the expense of reducing the freedoms of those they serve. None of us are gods, not even the President Trump, despite the weird claim he is God's chosen one. See Exhibit E, Exhibit 34.

I believe wise men use words. Weak men use weapons. I believe the wisdom of the Court's guidance can strengthen the weak, and reduce the temptation for

Americans to turn to violence. There have been attacks on churches, synagogues and diverse religious groups during Trump's administration.

Trump lights the fuel for the fires of hell by igniting religious persecution against me, and other groups by his encouragement and by his executive order.

Please put out that flame.

II. My case falls under the exception to mootness doctrine for matters of public importance that are capable of repetition but evading review. See, *State Farm Mut. Auto. Ins. Co. v. Davis*, 80 A.3d 628, 632–33 (Del. 2013); *MPT of Hoboken TRS, LLC v. HUMC Holdco, LLC*, No. CIVIL. 8442-VCN, 2014 WL 3611674, at *9 (Del. Ch. July 22, 2014); *Kahn v. Kolberg Kravis Roberts & Co., L.P.*, 23 A.3d 831, 836 (Del. 2011).

“There is a recognized exception to the mootness doctrine when the appeal raises matters of public importance that are capable of repetition but evade review.” Citing, *Smith v. State*, 198 A.3d 176 (Del. 2018).

“A trial judge's legal conclusions are reviewed de novo.” *Kahn v. Kolberg Kravis Roberts & Co., L.P.*, 23 A.3d 831 (Del. 2011)

This appeal is related to matters of public importance, preserving fundamental rights, including my free exercise of religion, speech and association from government suppression.

This appeal also relates to the imminent public threat of increasing the establishment of government agent religions, government party religions, and the danger of igniting government political government party fighting between different religious organizations that will likely cause more bloodshed than we have already seen against religious groups, or by religious extremists the past 6 years in the United States and globally.

Our government should not be permitted to misbehave by using religion to reign like other countries, including Israel.¹⁵ We must respect people's free exercise of conscience, including my own, to worship or not according to our own conscience our own free will, not forced will of others, which is not freedom but enslavement to the religious wills of the few under the threat of social, economic, or violent persecution.

We must keep ourself separate from the sins of other countries, by upholding the freedom to worship or not, according to the dictates of our own conscience not the dictates of the government and government employees like the President.

¹⁵ Israel reigns by violence or threat of violence, requiring two-year service of every citizen in the army, under the guise of God and government, an unholy-union. Israel violates the Torah, the Book they profess to govern under by persecuting Muslims and Palestinians when God says "And you are to love those who are foreigners, for you yourselves were foreigners in Egypt." Deuteronomy 10:19. See Romans Chapter 9, Not all Israel is Israel, it is not by bloodline.

The issues are capable of repetition yet evading review.

President Trump may run for office in 2024. He will likely continue to exploit Christianity in an attempt to serve government gain, his election seat.

Trump faces potential law suits once his presidency ends. Trump and his family have been involved in thousands of law suits, over his many years in life. He is so old, and more experienced than many attorneys. It is foreseeable he will manipulate the courts and a potential presidency to escape correction by courts. Trump will likely delay to defeat opponents in any future law suits, driving up costs, and time to defeat his opponents after his presidency, should he actually step-down Jan. 20, 2020. He will likely delay the cases until 2024 in hopes he may argue he is judgment proof should he become President again. A delay is likely to result as the pandemic worsens the next 1-3 years. The courts may partially close down.

I must be permitted to seek to remove the temptation for Trump to make a mockery of the courts and my God by preventing him from exacerbating the unholy-union of religion and state to serve his election seat in the future.

Even if Trump decides not to remain in office, or to run again in 2024, it is likely Biden and other federal employees will exploit religion under the Executive Order, and by alleged faith-based policies, suppressing and supporting the religions

that serve their government power in the immediate future. I will likely face the same Constitutional injury, albeit by a different President.

III. This dispute qualifies under another exception of the mootness doctrine, as capable of repetition but evading review.

In *United States v. Sanchez-Gomez*, 138 S. Ct. 1532, 200 L. Ed. 2d 792 (2018), The United States Supreme Court held, “A dispute qualifies for the exception to the mootness doctrine for a controversy that is capable of repetition, yet evading review only if (1) the challenged action is in its duration too short to be fully litigated prior to its cessation or expiration, and (2) there is a reasonable expectation that the same complaining party will be subjected to the same action again.”

Here, (1) the challenged action may be too short to be fully litigated against President Trump since President Elect Biden is replacing him, and (2) there is an expectation that I will be subjected to the same action again, albeit by a different President, based on my different religious and political beliefs, speech and association than Biden; or by President Trump again, should he remain in office or run for President in 2024.

This Court must allow this case to move forward to prevent continued and future abuse.

IV. The Court must not deny my access to the courts to address my fundamental rights, but must grant me leave to amend to address shortfalls in the Complaint.

The Court must not deprive me of the opportunity to be heard, merely because I inartfully pled my case, in my desperate desire to act quickly, albeit imperfectly, to prevent the continued substantial burden on my free exercise of religious beliefs speech, and association as a liberal Christian democrat.

If this Court deems my complaint defective, I still should not be deprived of access to the courts, to prevent denial of my Constitutional rights. I must be granted leave by this Honorable Court to amend my complaint to address all the Honorable Court's concerns.

“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).

“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).

There is arguably evidence this Court is seeking to deny my claim based on “potential prejudice” relating to wealth, affiliation and/or religious belief. See Exhibit 55.

“Courts are cautioned that because of the liberal pleading standard, a plaintiff should generally be granted leave to amend before dismissing a claim that is merely deficient.” Citing, *Grayson v. Mayview State Hosp.*, 293 F.3d 103, 108 (3d Cir.).

V. Conclusion:

“In the initial review process mandated by statute is the requirement that the Court determine whether the complaint is factually frivolous, legally frivolous or malicious. Del. Code Ann. tit. 10, § 8803(b). These terms are defined as follows: “legally frivolous” shall mean a claim based on an indisputably meritless legal theory.” *Gagnon v. Taylor*, 1998 Del. Super. LEXIS 408, *1, 1998 WL 729625

“Should the court decide to grant a motion to proceed in forma pauperis, its next step is to determine whether the complaint is factually frivolous, legally frivolous, or malicious. Del. Code Ann. tit. 10, § 8803(b). The purpose of this review is to determine whether service of process will issue or the complaint will be dismissed as factually frivolous, malicious or legally frivolous. All well-pled matters are accepted as true to determine whether the petitioner can recover under

any conceivable set of circumstances susceptible of proof under the complaint.”

Marvel v. State, 2014 Del. Super. LEXIS 638, *1, 2014 WL 7009516

“If the complaint is not frivolous, then service of process may be issued in order for the case to move forward.” *Id.* Del. Code Ann. tit. 10, § 8803(c).

I demonstrated evidence of standing, injury in fact, causation and redressability, to protect my fundamental right to freely exercise my religion and speech according to the dictates of my conscience, and to associate as a liberal Christian democrat, without government sponsored persecution.

My theory is not an “indisputably meritless legal theory,” but is based on sound logic on matters of personal faith, my religious beliefs and free association and speech relating to those beliefs. I may recover under a conceivable set of circumstances susceptible of proof under the complaint.

This Court must grant me the opportunity to be heard to safeguard the freedom to worship or not without government sponsored private or public persecution. This Court must allow me to plead to remove the establishment of government party religion, the republicans’ government sponsored version of Christianity, and remove the temptation from the Democratic party from foreseeably doing the same by rendering the Executive Order unconstitutional, granting injunctive, and granting the declarative relief requested.

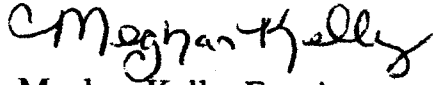
If I should fail, that is on me, not the Court. Please allow me to try to stand up for my faith in Jesus, in democracy, in justice, in our courts, as an imperfect radical, liberal Christian, democrat who places her trust in a perfect God, and a court system, with checks and balances, including appeals.

We are all winners, when we do the right thing, even if we fail. Allowing me to potentially fail against the most powerful man in the world, instead of protecting me from potential embarrassment is not helping me or the courts. I appreciate the Honorable Master's guidance in her determination before Defendant has an opportunity to attack my pleadings.

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.

Dated: December 5th 2020

Respectfully submitted,

Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
Pro Se, Bar No 4968
(Words 14995)

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

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

REGISTER IN CHANCERY
GEORGETOWN DELAWARE
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
President Donald J. Trump Praeceipe

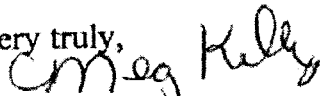
Dear Honorable Clerk of Court:

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).

President Donald J. Trump
The White House
1600 Pennsylvania Avenue NW,
Washington, DC 20500

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

REGISTER IN CHANCERY
GEORGETOWN DELAWARE
2020 OCT 12 P 2:09

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Civil process clerk Praeipce

Dear Honorable Clerk of Court:

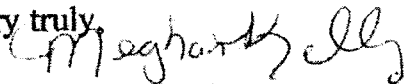
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Civil process clerk
for the US Attorney's
Office for the District of Delaware
U.S. Attorney's Office

**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

REGISTER IN CHANCERY
GEORGETOWN DELAWARE
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
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

M.K.
~~1313 N Market Street~~
~~Wilmington, DE 19801~~ *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

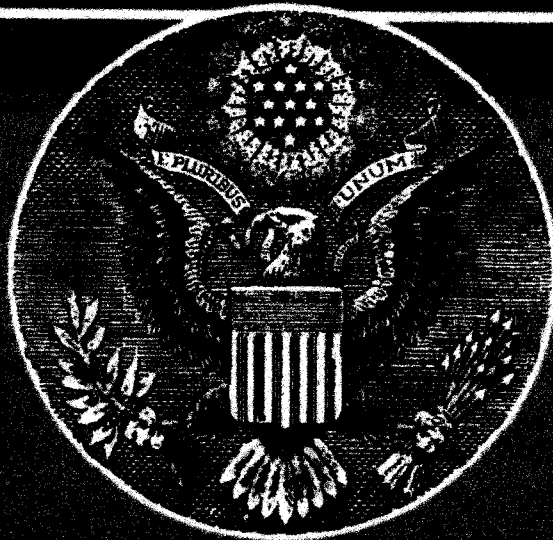
Dagsboro, DE 19939

APPENDIX H

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 secret
function

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

Coin to
Car
who put
at 1948
to out by
to
of

Keynes
Biggest
with

Disguised as loans

stealing it requires you pay it back with interest. You are robbed as a slave to artificial debt

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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 indentured servants.

That's what
Be The Fed R. d...
creates money out of
nothing for a profit

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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 offshore account have
no private tax. interest, so it
is safe from debt forgiveness
losses. (B) Understood

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
finance

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.

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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 Caroll 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

Gov can loan money out of nothing to people

Incest government Making gov enslaved by evil sin of the love of money driving out love for those they are charged to govern

They instead exploit and use them to gain profit.

Same as now Unjust gain on the dollar plus interest out of nothingness



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.

Danger of private currency

The danger of eliminating the Dollar which the gov not the Fed. Reason should concern

The Gov should govern guide and care for the people. Gov has no authority to print government bonds. We need to get their hands off the

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
Peel's

1- Roy W. Jastram, *The Golden Constant* (New York: Wiley, 1977), p. 113.

Same source of the Great Depression
and Recession of 2008. Debtors help
the common man by devaluing
the dollar, harming the banks by diminishing
their profit. The gold standard
can.

Creating money out of nothing for
the U.S. to borrow and over 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

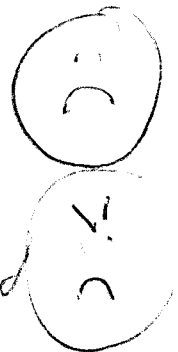
It is an incredible fact of history that, in spite of the general and recurring failures of the Bank of England during these years, the central-bank mechanism was so attractive to the political and monetary scientists that it became the model for all of Europe. The Bank of Prussia became the Reichsbank. 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
Start of Nothing to
serve greed not good



patron...
Cause Reserves...
2008...
The common...
the bank...
Bust...
7 positions...
nothing...
debt...
bankruptcy...
peers...
Retirees...
will lose...
all...
The game...
does not...
stop it with...
just laws...
Justice...
the...
~~the...~~

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 for
Bankers increased unjust profit

~~Jefferson~~
~~to the trade of money lender~~

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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

~~scribble~~

Usury is
against
the bible
teaching

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

Rent everything
Who the
Empire
400 Ind
Real
Is DECEPTION
EVIL

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

\$ created out of nothing

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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 taxes to serve the bankers profit and 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
taxes to care for the
people and fully fund
Gov. not enslave people
artificial increase gov
of the Fed Res.
Bank.

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 legalized 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
6
created money

THE CREATURE COMES TO AMERICA

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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.
gov. \$ credit

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

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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.

EFiled: Sep 22 2020 12:57PM
Transaction ID 65953103
Case No. 2020-0809-



EXHIBIT

1



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DEPUTY BAR COUNSEL

November 28, 2018

PRIVATE AND CONFIDENTIAL

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

Re: File No. 2018-2051
Respondent: Brett M. Kavanaugh

Dear Ms. Kelly:

Not require discretion re: burner ☹️

I acknowledge receipt of your correspondence dated November 15, 2018 concerning Brett M. Kavanaugh.

This office investigates complaints against Maryland attorneys that allege violations of the Maryland Attorneys' Rules of Professional Conduct. Maryland Rule 19-711(b)(2) provides, in part, that Bar Counsel "may decline a complaint submitted by an individual who provides information about an attorney derived from published news reports or third party sources where the complainant appears to have no personal knowledge of the information being submitted."

Based upon my review of your complaint, it appears that you do not have personal knowledge of the information submitted and that your complaint is derived from published news reports and/or third party sources. As such, I am declining the complaint pursuant to Maryland Rule 19-711(b)(2), and the file is now closed.

Please refer to the Frequently Asked Questions section of our website available at courts.state.md.us/attygrievance for additional information about the limitations of our jurisdiction.

Thank you for bringing this matter to our attention.

Very truly yours,

Lydia E. Lawless



OFFICE OF DISCIPLINARY COUNSEL

October 30, 2018

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Disciplinary Counsel

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Deputy Disciplinary Counsel

Senior Assistant Disciplinary Counsel
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CONFIDENTIAL

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

**Re: Kavanaugh/Kelly
Undocketed No. 2018-U548**

Dear Ms. Kelly:

We have reviewed the disciplinary complaint that you filed against the Honorable Brett Kavanaugh, which this office received on October 5, 2018. This office does not have jurisdiction to review complaints against members of the judiciary.

It appears The Supreme Court of the United States has forwarded complaints against Justice Kavanaugh to the Judicial Council of the United States Court of Appeals for the Tenth Circuit. You may wish to file your complaint at the following address:

Office of the Circuit Executive
1823 Stout Street
Denver, CO 80257
(303) 844-2067

Thank you for your concerns.

Sincerely,

Becky Neal
Senior Assistant Disciplinary Counsel

BN:AW

EXHIBIT

2

EFiled: Mar 03 2020 10:00AM EST

SUPPLEMENTAL INFORMATION PURSUANT TO RULE 3(A)
OF THE RULES OF THE COURT OF CHANCERY



The information contained herein is for the use by the Court for statistical and administrative purposes only. Nothing stated herein shall be deemed an admission by or binding upon any party.

1. Caption of Case: Meghan Kelly, Plaintiff v The Democratic Chair, Erik Prosser - Schramm a.k.a. Erik Schramm; individually and in his capacity as the Chairman of the Democratic Party for the State of Delaware, Anthony Albence, Kathleen Jennings, The Delaware Department of Elections, Sussex County Department of Elections, Kent County Department of Elections, New Castle County of Elections, the Democratic Party of the State of Delaware.

2. Date Filed: 3/2/20

3. Name and address of counsel for plaintiff(s):

Prose. Meghan Kelly
34012 Shawnee Drive
Dagsboro, DE 19939

4. Short statement and nature of claim asserted: Defendants require as a condition precedent that Meghan Kelly violate her religious beliefs in Jesus by conforming with the filing fee and signature requirements under 10 Del C. § 3103(a)(1)(a)(b) in order to be placed on the ballot as a democratic candidate for the US House of Representatives seat, in violation of Meghan Kelly's First Amendment Rights, applicable to Defendants pursuant to the 14th Am. under this class of case, as applied to Meghan, including her rights of free exercise of religion, speech, association, and the right to run for office without disobeying Jesus, essentially selling her soul.

5. Substantive field of law involved (check one): to Satan

- Administrative law
- Commercial law
- Constitutional law
- Corporation law
- Trade secrets/trade mark/or other intellectual property
- Labor law
- Real Property
- 348 Deed Restriction
- Zoning
- Trusts, Wills and Estates
- Consent trust petitions
- Partition
- Rapid Arbitration (Rules 96,97)
- Other

6. Related cases, including any Register of Wills matters (this requires copies of all documents in this matter to be filed with the Register of Wills):

N/A

7. Basis of court's jurisdiction (including the citation of any statute(s) conferring jurisdiction):

10 Del C § 341

8. If the complaint seeks preliminary equitable relief, state the specific preliminary relief sought. TRO is

that Defendants be restrained from completing the ballot preparation process without including the name of Meghan Kelly as a democratic candidate for the US House of Representatives for the upcoming primary.

9. If the complaint seeks a TRO, summary proceedings, a Preliminary Injunction, or Expedited Proceedings, check here . (If #9 is checked, a Motion to Expedite must accompany the transaction.)

10. If the complaint is one that in the opinion of counsel should not be assigned to a Master in the first instance, check here and attach a statement of good cause. _____

Meghan Kelly 4968
Signature of Attorney of Record & Bar ID

EFiled: Mar 03 2020 10:00AM EST
Transaction ID 64781595
Case No. 2020-0157-



IN THE CHANCERY COURT OF THE STATE OF DELAWARE, SUSSEX COUNTY

)
)
 Meghan Kelly)
)
 Plaintiff,)
)
 v.)
 The Democratic Chair, Erik)
 Raser-Schramm, a.k.a. Erik Schramm)
 Individually, and in his capacity as)
 The Chairman of the Democratic)
 Party for the State of Delaware,)
 Anthony Albence, individually, and)
 in his capacity as The Election)
 Commissioner of the State of)
 Delaware Department of Elections,)
 Kathleen Jennings, individually, and)
 in her capacity as Attorney General of)
 the State of Delaware, the Delaware)
 Department of Elections, Sussex)
 County Department of Elections, Kent)
 County Department of Elections, New)
 Castle County Department of)
 Elections, and The Democratic Party)
 of the State of Delaware, a.k.a.)
 The Delaware State Committee, a.k.a.)
 The State Executive Committee, a.k.a.)
 The Democratic Party State Executive)
 Committee, a.k.a. The Executive)
 Committee of The Democratic party)
 Defendants.)

Civil Action No.:

**PLAINTIFF'S CASE FOR CHRIST,
 PLAINTIFF'S COMPLAINT AGAINST DEFENDANTS FOR THEIR
 VIOLATION OF THE EQUAL PROTECTIONS CLAUSE, IN THIS
 CLASS OF ONE, UNDER THE 1ST AMENDMENT APPLICABLE
 TO THE DEFENDANTS VIA THE 14TH AMENDMENT, FOR
 DEFENDANTS UNLAWFUL APPLICATION OF 15 DEL.C. § 3103,
 CONDITIONING PLAINTIFF'S RIGHT TO RUN TO OFFICE,**

**ON THE EMILINATATION OF OTHER
FUNDAMENTAL RIGHTS, AS APPLIED TO PLAINTIFF**

Meghan Kelly, by and through her own representation, Attorney Meghan Kelly, Esquire, brings this Verified Complaint, and contemporaneously therewith, *Plaintiff's Temporary Restraining Order*, and states as follows:

THE PARTIES

1. Meghan Kelly (also referred herein as, "Meghan," "Plaintiff," "I," or "me," or "my" or "myself" also "she" and "her") is an adult resident of the state of Delaware, residing at 34012 Shawnee Drive, Dagsboro, DE 19939.

2. Defendant Erik Raser-Schramm, in his individual capacity, and in his official capacity as Chairman of the Democratic Party a.k.a. Democratic Chair ("Party Chair" and collectively, "Defendants") is a Delaware resident. The Party Chair may be served at the Democratic headquarters, a.k.a. his place of business, at, The Democratic Party of the State of Delaware, 9 E. Commons Blvd., Suite 2, New Castle, DE 19720. He may be served at C/O, The Democratic Party of the State of Delaware, 9 E. Commons Blvd., Suite 2, New Castle, DE 19720.

3. Defendant Election Commissioner of the State, Anthony Albence, (Individually "Commissioner" and collectively, "Defendants"), in

his personal capacity and in his capacity as Election Commissioner, is a resident of the state of Delaware, whose place of business is at 905 S. Governors Ave Suite 170 Dover DE 19904. He may be served at 905 S. Governors Ave Suite 170, Dover DE 19904.

4. Defendant Kathleen Jennings, (Individually "AG," and collectively "Defendants"), in her personal capacity and in her capacity as the Attorney General for the State of Delaware, whose place of business is located at Carvel State Building 820 N. French St., Wilmington, DE 19801. She may be served at Building 820 N. French St., Wilmington, DE 19801.

5. Defendant Delaware Department of Elections (Collectively, "Defendants"), has an address of 905 S. Governors Ave Suite 170 Dover DE 19904.

6. Defendant Sussex County Department of Elections (Collectively, the "Defendants"), has an address of 119 N Race St, Georgetown, DE 19947.

7. Defendant Kent County Department of Elections (Collectively, "the Defendants"), has an address of 905 S. Governors Ave Suite 170 Dover DE 19904.

8. Defendant New Castle County Department of Elections (Collectively, the Defendants"), has an address of 820 N French St Ste 400, Wilmington, DE 19801.

9. Defendant Democratic Party of the State of Delaware, a.k.a. the Delaware State Committee, a.k.a. the State Executive Committee, a.k.a. the Democratic Party State Executive, Committee, a.k.a. the Executive Committee of the Democratic Party, (the "Party" and the "Committee" and collectively, the "Defendants"), The Delaware Democratic Party located at 9 E. Commons Blvd., Suite 2, New Castle, DE 19720.

JURISDICTION

10. This Honorable Court has jurisdiction over Plaintiff's claims pursuant to *10 Del. C. Section 341*.

11. This Honorable Court has personal jurisdiction over Defendants because Defendants are Delaware residents.

12. Defendants regularly conduct government business in this state and claims against Defendants arise from Defendants' government business transactions in the state of Delaware.

FACTS

I. PROCEDURAL AND LEGAL FACTS

13. This case arises upon the Defendants' unconstitutional condition

precedent requiring Meghan Kelly to violate her religious beliefs, her belief in Jesus Christ's teachings, by conforming with the filing fee and or signature requirements pursuant to *15 Del.C. § 3103 (a)(1)(c),(d)*, in order to be placed on the ballot as a democratic candidate for the U.S. House of representative seat in the state of Delaware for the upcoming election, in violation of Meghan Kelly's first Amendment Rights, applicable to the Defendants pursuant to the Fourteenth Amendment under the Equal Protections Clause of the Constitution, in this class of one, as applied to Meghan, including her right(s) of free exercise of religion, speech, association, and right to run for office without disobeying Jesus, thereby compromising her faith and in doing so, essentially selling her soul to Satan to gain the world. (See Exhibit 1, *15 Del. C. § 3103*)

14. The Constitution preempts conflicting state and local laws and regulations.

15. The Defendants must overcome strict scrutiny to defeat Meghan Kelly's claims, in this class of one, under the Equal Protections Clause Applicable to Defendants under the Fourteenth Amendment.

16. The Equal Protections applies where a law treats a person or class of persons differently from others. An Equal Protections claim, may be brought with as few members as one. (See, *Village of Willowbrook v. Grace*, 528 US 562 (2000)).

17. Where a law limits fundamental rights, strict scrutiny will be applied, and the law, or other government action, will be upheld only if it is

necessary to promote a compelling or overriding interest.

18. All fundamental rights including the rights I seek to uphold here, including but not necessarily limited to, the right to run for office related to the right to vote, according to the dictates of my own conscience, not the dictates of the government, or agents acting with under the cloak of government authority or power, and the freedom to worship or not according to the dictates of my own conscience, not the dictates of the government or agents acting with under the cloak of government authority or power, the freedom to speak or not to speak according to the dictates of my own conscience, not the dictates of the government or agents acting with under the cloak of government authority or power, and the freedom to associate or not, according to the dictates of my own conscience, not the dictates of the government or agents acting with under the cloak of government authority or power are at issue.

19. The Party's and the Party Chair's conduct is so entangled with the government's function, to be considered government conduct.

20. The Party and Party Chair must be considered as agents of the government, acting with under the cloak of government authority or power.

21. With the cloak of government power, the Constitution, and our laws derived from the Constitution, limit the freedoms of those in government, or acting under the cloak of government authority, such as the Party and the Party Chair, in order not to chill the freedoms of those they serve. The Constitution in this manner makes the common man more

powerful than those in positions of government authority.

22. So, I understand, once I am in office I will have fewer freedoms to speak about my belief in Jesus Christ than I do now in order not to chill the freedoms of those I hope to serve. I am just not willing to disobey Jesus to gain an election seat.

23. The Party Chair has the power to waive fees. (See, *Bartley v. Davis*, No. CIV.A. 8561, 1986 WL 8810, at *1-2 (Del. Ch. Aug. 14, 1986), *aff'd*, 519 A.2d 662 (Del. 1986), (The Honorable Chancery Court noted, “This [filing fee] requirement has long been a method to effectuate the above purposes and past political practice, according to the Chairmen of the Delaware Democratic and Republican Parties, has permitted this requirement to be waived.”). (See, Exhibit 2).

24. The Honorable Delaware Supreme Court, on appeal, noted that the party Chair only has statutory authority to waive such fees prior to the filing deadline. (“Attempted filing fee waiver of democratic state chairman, acting for democratic state committee after notification date, was invalid. 15 Del.C. §§ 3103(c), 3106.” *Bartley v. Davis*, No. CIV.A. 8561, 1986 WL 8810, at *5 (Del. Ch. Aug. 14, 1986), *aff'd*, 519 A.2d 662 (Del. 1986), Citing, *Bartley v. Davis*, 519 A.2d 662 (Del. 1986)”). (See, Exhibit 3).

25. The Party Chair and the Party has chosen not to exercise their authority to grant such waiver as mandated under the Constitution, in utter disregard to Meghan Kelly's religious waiver request, thereby essentially persecuting her based on her faith in Jesus Christ.

26. Similarly, the other Defendants, including but not limited to the Commissioner and the Delaware Department of Elections also refuse to comply with the Constitution by waiving the filing fee and signature requirements by entering her filing form as complete, thereby essentially persecuting Meghan Kelly based on her free exercise of religion.

27. The Honorable Third Circuit Court, in *Belitskus v. Pizzigrilli*, 343 F.3d 632 (3d Cir. 2003) held, “State’s power to regulate elections must be exercised in a manner consistent with the Equal Protection Clause of the Fourteenth Amendment. *U.S.C.A. Const. Art. 1, § 4, cl. 1; U.S.C.A. Const. Amend. 14.*”). (See, Exhibit 4).

28. “When First and Fourteenth Amendment rights are subjected to severe restrictions under state election regulation, the regulation must be narrowly drawn to advance a state interest of compelling importance; however, when a state election law provision imposes only reasonable, nondiscriminatory restrictions upon the First and Fourteenth Amendment rights of voters, the State’s important regulatory interests are generally sufficient to justify the restrictions. *U.S.C.A. Const. Amends. 1, 14*”); *Id* (Indigent candidates’ “as applied” equal protection challenge to Pennsylvania’s mandatory filing fee requirements was not moot under “capable of repetition, yet evading review” exception to mootness doctrine, although election in which they ran had been held; challenge was too short in duration to be fully litigated prior to its expiration, and given lack of evidence to the contrary, it was reasonable to assume that the candidates

would once again seek waiver of mandatory fees due to indigency. U.S.C.A. Const. Amend. 14; 25 P.S. § 2873(b.1).” This case is distinguished since the sole issue is based on Meghan Kelly’s free exercise of her religious beliefs, which also affects her free exercise of speech, association and rights associated with her candidacy for office in this case. Yet, this Court’s analysis of the “capable of repetition, yet evading review” doctrine applies to the case at hand). *Id.*

29. On or about October 28, 2019, Meghan Kelly sent the State Chair, a representative of the Democratic party, Jesse Chaderon (“Jesse”), the Party through the State Chair and Jesse, the Delaware Department of Elections an email through a representative of the Delaware Department of Elections, Kenneth A. McDowell (hereinafter referred to as “Bo,” in his capacity as an agent of the Delaware Department of Elections, and not in his personal capacity), and additional people not relevant to this case, my request for a waiver from signature and or filing fee requirements, so as not to violate my religion, freedom of speech, and freedom of association, in order to be placed for on a ballot for the upcoming election for the US House of Representatives, via an email containing 4 attachments, including a letter to the Honorable Democratic Chair Erik Raser-Schramm, officially making this request. (See, Exhibit 5, the Email and the attachments thereto

including, Exhibit 5, A, the Letter and attachments to the Honorable Party Chair, Exhibit 5, B, (*excluding the attachments to the letters in 5A and 5B and attaching the same as Exhibits 21-29 herein to conserve paper and removing the old exhibit pages and removing the old exhibit pages *), the US Supreme Court letter and attachments, Exhibit 5, C, The US Supreme Court Response, Exhibit 5, D, the Attorney Grievance Commission of Maryland's determination relating to Justice Kavanaugh).

30. On October 28, 2019, Bo kindly responded back to my Email to confirm, I was no longer seeking to run for President of the United States. (See, Exhibit 6, Bo's email, Exhibit 6, A, Emails to Defendant Delaware Department of Elections relating to Plaintiff running for President, Exhibit 6, B, an Email to Jesse and the Party and the Party Chair through Jesse relating to running for President.).

31. I emailed Bo, the ACLU, Jesse, and people unrelated to this case, to inform them to please withdraw my previous request for a waiver of signature and fee requirements to run for President of the United States. (See, Exhibit 7)

32. On or about October 29, 2019, Jesse kindly replied to my email stating he "Just wanted to acknowledge receipt of your email. I will get back

to you once I've had the chance to discuss this with the State Party Executive team" (See, Exhibit 8).

33. On or about October 29, 2019, Bo kindly took time to talk with me on the phone, as he has so often generously has done throughout the last few years. He kindly indicated the Party Chair must grant me a waiver.

34. I sent Bo the attached email to confirm my understanding that I must hold off until a determination is made by the Party Chair. (See, Exhibit 8).

35. I followed up on or about Nov 18, 2019, with an email to Jesse and the Party, and the Party Chair to check on the status of the Democratic Chair and Committee's decision. (Exhibit 9).

36. Jesse requested clarification. I provided clarification concerning my waiver in response to Jesse, the Party, and the Chair on or about November 22, 2019. (Exhibit 9).

37. On or about January 28, 2020, I sent an email to Jesse and the Party Chair, Bo, and unrelated parties requesting that they "Please provide a response!" (Exhibit 10)

38. I received an official response in the mail, dated February 3, 2020, from the Party through the Party Chair, stating:

"The Delaware Democratic Party (the "Party") is in receipt of your October 28, 2019 letter requesting a waiver of certain filing fee and

signature requirements. In keeping with current party practice and to maintain the integrity of the primary process, the Party declines to reduce, modify or waive any filing fees for any candidate. We note that you may contact the Delaware Department of Elections for additional information regarding statutory requirements and the ability to seek a waiver thereof from that office in certain circumstances." (Exhibit 11)

39. On or about February 11, 2020, I sent the Delaware Department of Elections, via Bo, the Party's determination via email, and again sought a waiver of both the filing and or signature requirements from the Delaware Department of Elections,' in light of the fact such requirements violated my faith in Jesus Christ's teachings. (Exhibit 11, Exhibit 12).

40. On or about February 13, 2020, I followed up, and sent Emails to the Defendants, where I tried to explain, in another way, how collecting signatures violates my faith. (Exhibit 13).

41. On or about February 15, 2020, I completed the filing form, and signed it before a notary. (Exhibit 14).

42. On or about February 16, 2020, I sent the filing form via email to the Party, the Party Chair, Jesse, Bo, the Commissioner, via email. (Exhibit 14, Exhibit 15).

43. On or about February 17, 2010, I called the Commissioner to confirm receipt and to request a waiver of both signature and filing fee requirements so as not to violate my faith in Jesus Christ. The Commissioner

denied my request for a waiver. (Exhibit 16, a follow up Email confirming the conversation where the Honorable Commissioner confirmed receipt).

44. I attempted to persuade them via emails, and calls, to help them understand how the filing requirements violate my faith. (Exhibit 17, includes a variety of emails).

45. I also attempted to show the Defendants how well suited I am for the Democratic House of Representative seat by sending them various emails reflecting some of my efforts in proposing changes in the federal law and on garnering support to impeach on the 4 full separate articles of impeachment I drafted and a 5th one I started to draft. (See, Exhibit 18).

46. I am not ashamed of pleading with the Defendants to grant me a waiver. So, I do not have to disobey Jesus. (See, the Parable of the judge who lacked compassion. (See, Luke 18:1-8); (Also see, the funny parable of the man who kept bothering his neighbor in the middle of the night, until his neighbor gave him bread. Luke 11:5-13); (Also see, Luke 11:9, Matthew 21:22, Matthew 7:7 and James 4:3,)).

47. On or about February 23, 2020, I sent a number of emails to the Defendants where I demanded the Delaware Department of Elections, and the County Department of Elections and the Commissioner register my filing form as filed, as of the date received or in the alternative before the

filing deadline, without the condition precedent that I disobey Jesus Christ by conforming to the signature or filing fee requirements. (Exhibit 19).

48. I have not received a response to my demand.

49. I think the Department of Elections blocked my number. I attempted to call Bo, Kent County Department of Elections, Sussex County Department of Elections, and New Castle County Department of Elections. Unfortunately, it appears I have been blocked, as the "Your call cannot be completed at this time. Please try again later..."

50. Sadly, I failed to persuade the Defendants to register my form as filed.

51. So, I filed the Complaint in this matter, in an effort, *inter alia*, to secure the inclusion of Meghan Kelly's name as a democratic candidate for the United States House of Representatives seat for the State of Delaware for the upcoming election.

52. Pursuant to 15 Del.C. § 3101, "(1) Notification of candidacy shall be on or before 12:00 noon of the second Tuesday in July." (See, Exhibit 20).

53. That leaves very little time to respond to the pleadings.

54. That leaves very little time for me to provide notice to the public to gain their vote via non-compromising means such as newspaper articles, Facebook, and walk and talks.

55. I seek to run as a Democrat for the US House of Representative's seat in the state of Delaware.

56. I will likely face competition in the primary by Delaware's current democratic representative, in the U.S. House of Representatives, should this Honorable Court kindly grant me relief.

57. The Defendants refused to accept my filing form as registered, entered, filed and/or complete so as to assure me that I will be placed on the ballot for the upcoming election.

58. On or about October 28, 2019, I submitted the email, and attachments, including the letter to the Honorable Chair Erik Raser-Schram (hereinafter "Initial Waiver Request" or (IWR)," letter to the US Supreme Court, Court stamped Receipt, and ODC response from the Attorney Grievance Commission of Maryland relating to Justice Kavanaugh. (See, Exhibit 5, the Email and the attachments thereto including, Exhibit 5, A, the Letter and attachments to the Honorable Party Chair, Exhibit 5, B, (*excluding the attachments to the letters in Exhibits 5A and 5B and attaching the same as Exhibits 21-29 herein to conserve paper*), the US

Supreme Court letter and attachments, Exhibit 5, C, The US Supreme Court Response, Exhibit 5, D, the Attorney Grievance Commission of Maryland's determination relating to Justice Kavanaugh).

59. In the Initial Waiver Request, I noted "(A) caveat (relating to donations), I would be willing to accept donations from the democrat(ic) party as they cannot buy me or influence me since I am already a Democrat." (Id.).

60. I have since realized that donations from the democrat party also violate Jesus Christ's teachings and lead to corruption, as I communicated to Defendants. (See Exhibit 17, included communication along with other emails).

61. I attempted to explain how both filing fee and signature requirements violate my faith in Jesus Christ as I pleaded with the Defendants to grant a waiver, so as not to violate my freedom of speech, religion and right to run for office, by conditioning such rights on eliminating another Constitutionally protected right, as applied to me.

62. I should not have to be forced to sell my soul to Satan as a condition precedent, to run as a candidate in an election.

63. I should not be forced to disobey Jesus in order for an opportunity to gain an election seat.

64. The Defendants violate my freedom to worship or not according to the dictates of my conscience, not the dictates of the government's convenience, or the dictates of the convenience, profit and the power of a few who prefer to buy or barter candidates to serve their own personal agenda at the expense of the voters, the people they are charged to care for either by law, or by proclamation of the Party.

65. The Defendants violate my *freedom*, by such unconstitutional condition precedent as applied to me.

66. I define *freedom as free will* to choose: to think or ignore, to care or harden your heart to, to love or not. I choose to think, care, love God, accessible through Jesus, God, the father, and the Holy Spirit, not by mere words alone, but by faithfully doing his will, even if I am the only one.

I. PLAINTIFF'S RELIGIOUS BELIEF

67. Meghan Kelly repeats and incorporates by reference all of the above paragraphs and all of the below paragraphs, and the Exhibits the paragraphs refer to therein as admissible under nonhearsay and hearsay exceptions, including but not necessarily limited to, probative fact, state of mind, belief, admission by party opponent, as though set forth herein in the first instance.

68. My personal religious beliefs are in issue. So, I am providing additional facts concerning these relevant issues

69. I am a Christian, and I find guidance in the Bible.

70. Pursuant to the Bible, Jesus says, "The greatest among you is your servant." (Citing, Matthew 23:11). Accordingly, living to serve self is not great.

71. In fact, I believe the root of corruption in both business and government is serving those who serve you, thereby serving yourself, instead of the people you are supposed to serve.

72. I believe living for self, and your own family, your own community and for those who affect, serve and benefit you, thereby living for self, without regard to others reflects the image of Satan. (Please see, Isaiah 14:13-14, Satan wanted to live for himself. He wanted to be his own God. Satan did not want to lay down his love for God, by in part loving others as himself, even outsiders, even the least of these. (Also see, Ezekiel 16:49, People were damned to hell for their unconcern "they did not help the poor and needy."); (Also see Matthew 13:18-19 "the worries of this life, the deceitfulness of wealth and the desires for other things come and choke the word, making it unfruitful," meaning those people will be burnt up in hell.); (Further see, Luke 17:26-34 where Jesus also gave us examples of people

merely caring for their own family and their own needs, working, buying and selling, eating and drinking, marrying and given into marriage before they were destroyed to be damned to hell for giving into tempting distractions of making money and making merry, and, or the anxieties of life while failing to understand the true purpose of life and eternal life, loving God and loving others as yourself, not exploiting others, outsiders to serve your greed); (Also see, Matthew 7:21 "Only those who do the will of God, go to heaven.); (Also see, Matthew 16:24, Luke 9:23, Matthew 10:38, and Mark 8:34, regarding true followers must stop doing what they desire to do, and do what God desires instead. Loving others even if it is painful.)

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

74. I believe people sin against God when they merely serve their own children and families, and those who serve or affect them, instead of all the people they are appointed to serve in their position of life.

75. Jesus said even evil people care for their children. (See, Matthew 7:9-12, "Which of you, if your son asks for bread, will give him a

stone? Or if he asks for a fish, will give him a snake? If you, then, though you are evil, know how to give good gifts to your children...").

76. Jesus said even those without God love those who love them, and greet those who great them. (See, Luke 6:32-35, "if you love those who love you, what credit is that to you? Even sinners love those who love them. And if you do good to those who are good to you, what credit is that to you? Even sinners do that. But love your enemies, do good to them, and lend to them, expecting nothing in return. Then your reward will be great, and you will be sons of the Most High; for He is kind to the ungrateful and wicked"); (See also, Romans 12:14); (See Matthew 5:44-45, "But I tell you, love your enemies and pray for those who persecute you, that you may be sons of your Father in heaven."); (Matthew 5:46-47, "If you love those who love you, what reward will you get?... And if you greet only your people, what are you doing more than others? Do not even the pagans do that?").

77. I believe God calls us to love God foremost and to love others, even those outside of our own, even our enemies, as ourselves. (See, Matthew 22:36-40, The greatest command in the bible is to love God. Subordinately, Love others as yourself. All commands are weighted on these.).

without God in their hearts have an emptiness they attempt to fill with fleeting fancies, fleeting feelings, fleeting funding or other idols in place of God's love).

82. I believe some Republicans in office teach the image of Satan, the lawless one, as good by teaching everyone for themselves under the facade of responsibility, without love or concern for outsiders or those beyond their own, misleading those they serve to harm and hell. (Citing, 2 Thessalonians 2:8).

83. It makes me sad because I believe some Republicans in office violate the First Amendment and God's laws by using God's name for their own vanity, meaning their own purpose in place of God's purpose, to serve power and profit under the guise of God thereby misleading people to harm and hell.

84. Sadly, I believe people go to hell for their confusion. Satan, the lower case god of this world, confuses to kill eternally. Pull 2 Corinthians, Chapter 4 to confirm.

85. So, I seek to draft laws to alleviate confusion as to what is good and evil, to correct not to condemn, to prevent harm in this life and eternal life.

86. I also seek to be in a position to impeach President Trump since it is likely he will win by cheating, election hacks.

87. The prophets in the Old testament, John the Baptist, Jesus and the apostles all bravely and courageously confronted leaders who did evil, by serving themselves instead of those they were charged with serving.

88. The Holy Spirit, via God, via my conscience, teaching me to care, to love, is leading me to do the same as the prophets, to correct the President by seeking a position that will allow me to impeach him, in hopes to heal not only the victims of the harm he causes, but to heal his ugly heart with God's truth in love, not deception. God loves other people too, even your enemy, people of other political affiliations, races, religions, and places of origin, even if they do not know God, even if they have not accepted God's love. President Trump sins against God and man by harming others to serve self. (Daniel 13:45 "God stirred up the Holy Spirit of a young boy named Daniel."); (See, Genesis 41:38, Exodus 31:3, Numbers 11:17, Numbers 11:25); See, Deuteronomy 34:9. "The holy spirit is also called the "spirit of Wisdom,"); (See, Judges 3:10 The Holy Spirit is also called the "**spirit of the Lord**" The holy spirit works the same in the Old testament too. It is the same God.); (Also see, Romans 8:14 "**those who are led by the Spirit of God are children of God.**,"(emphasis intended)); (Also see,

Psalm 51:13, Wisdom 1:5, See the entire book of wisdom too, See, Matthew 1:18); (See, Matthew 12:32 "And whoever speaks a Word against the Son of Man will be forgiven; but **whoever speaks against the holy Spirit will not be forgiven, either in this age or in the age to come.**" (emphasis intended)); (See, Matthew 28:19 "Go therefore and make disciples of all nations, baptizing them in the name of the Father, and of the Son, and of the **Holy Spirit.**"); (See, Mark 13:11, Mark 12:36, Mark 3:29, Matthew 3:11, John 14:26, John 16:13, John 14:17, Ephesians 1:13, 1 John 4:6); (And see, John Chapter 3, Regarding being born again, being born of flesh in human life and of **spirit** receiving eternal life the same as Moses and Daniel did in the Old Testament.).

89. In Ezekiel Chapter 34:1-10, God scolds leaders, shepherds who take advantage of the sheep to serve themselves instead of caring for them. "Woe to you shepherd of Israel who only take care of yourselves! Should not shepherds take care of the flock? You eat the curds, clothe yourself with wool and slaughter the choice animals, but you do not take care of the flock..." Id. (Also see, Jeremiah 23:1, and Zechariah 11:17).

90. My religious beliefs prevent me from gathering money or signatures in adherence to the requirements under 15 Del.C. § 3103.

91. Even if I had the money to pay my religious beliefs prevent me from paying the filing fee.

92. Payment of the filing fee violates my freedom not to speak and freedom not to encourage conduct, payment and use of money that I believe leads myself and other people to harm and hell. I believe it is wrong.

93. I believe paying the filing fee is a sin against God.

94. I will not collect donations or signatures from individuals or lobbyists as this violates my religious beliefs against partiality and favoritism, serving those who serve me, thereby serving myself, by potential invisible strings attached to such donations.

95. I am a Democrat because they love people, not money. Democrats tend to serve people, not greed. I believe people go to hell for seeking money in place of God. (See Matthew 6:24, and Luke 16:13, "You cannot serve God and money."). (Also See, See, Luke 19:45-48, Malachi 3:1-3, Matthew 21:12-13, Mark 11:15-19, John 2:13-17, Jesus chased people out of the temple for stealing the real treasure, people's eternal lives.); (See. Matthew 23:15, Jesus told the leaders they were making their followers twice as worthy of hell as they were since the leaders taught them to focus on money instead of God.)

96. I would be a misleader, not a leader, if I taught people to serve greed instead of teaching them to care for one another since I believe serving greed leads many to hell. (See, Acts 8:20, "Peter answered: 'May your money perish with you, because you thought you could buy the gift of God with money!"). People are more valuable than money. God commands us to love people not money. In John 13:34, Jesus said "A new command I give you: Love one another. As I have loved you, so you must love one another."

97. I am a leader because I think for myself after analyzing facts and laws. I will seek to do what is in the best interest of the American people, not what immediately pleases some of their immediate desires only to harm them down the line. That is wrong. I take responsibility for my decisions made on behalf of others, and I will not be influenced by money or support.

98. I was correct when I wrote to the Party Chair, "I do not believe the Democratic party will support me though I support their love for people and the environment over profit. I am against two positions the party heads seem to support." in the October 28 letter. (Exhibit 5, B).

99. By their failure to grant me a waiver, thereby persecuting based on my religion, this powerful group of a few, the Party, indicated they do not respect or support my freedom of religion.

100. With regards to two issues that the powerful few support since it supports their pockets, I do not encourage or support abortion and the death with dignity acts. I believe they harm people, or potential people not only here, but in eternity too. I would be a bad leader if I led people I served to harm people or themselves for mere temporary ease, comfort or profit.

101. I am against abortion. I do not believe they go to heaven. I believe they were robbed of the opportunity to be born of flesh and born of spirit. (See John Chapter 3:3-8, "Jesus replied, very truly I tell you, no one can see the kingdom of God unless they are born again. ... Jesus answered, very truly I tell you, no one can enter the kingdom of God unless they are born of water and the Spirit. Flesh gives birth to flesh, but the Spirit gives birth to spirit..."). Accordingly, the potential people not only lost life in this life, they lost eternal life too. (Also see, Ezekiel Chapter 9 Children can choose a way of life leading to hell too).

102. I am also against the Death with Dignity Acts. Many people may make mistakes, even professionals and experts such as doctors and health care professionals. None of us are gods. They may misunderstand or

may lie for money or convenience. So great injustice may result. Ignorance or error will not reverse the harm done.

103. Further, I believe people may go to hell for killing themselves. It is not loving to encourage those you serve to die and go to hell out of convenience, comfort, or martyrdom for the temporary convenience for themselves or other people, or to save money. People are more valuable than money, things or comfort. There are two examples of people who killed themselves and went to hell in the bible. King Saul in the Old Testament, and Judas Iscariot.

104. Pursuant to 1 Samuel 31:4, "...Saul took his sword and fell on it." Saul killed himself. In 1 Chronicles 10:13 provides, "Saul died because he was unfaithful to the LORD; he did not keep the word of the LORD..." I do not believe he went to heaven because of these words.

105. The other example is Judas Iscariot. In Matthew 27:1-10, Judas said sorry, confessed his sin, gave the 30 shekels back. Unfortunately, he gave into despair instead of repenting by faith and trust in God's love and mercy. He killed himself instead of living to love God and love those God loves, everybody even our enemies.

106. In John 17:12, Jesus says, "he was doomed to destruction." So, I do not believe Judas escaped Satan's goal damnation.

107. I believe we live or die for God. Citing, Romans 14:8. Those who live and die for self or for mere people instead of God do not go to heaven.

108. I believe Jesus was not kidding when he said you who love mother and father more than me are not worthy of me. You who love son and daughter more than me are not worthy of me are not worthy of me. (Citing, Matthew 10:37).

109. I believe Jesus was not kidding when he said unless your “righteousness exceeds that of the scribes you will” not go to heaven. Matthew 5:20. I believe our righteousness exceeds that of the scribes by our trust in God.

110. The Bible teaches, Abraham believed what God said. His belief was attributed to righteousness. Citing, Genesis 15:6. Abraham listened to God to the point he was willing to sacrifice his own son.

111. I believe this righteousness was attributed to Lot when he listened to God’s word through messengers, the angels. He did not even turn around when his wife turned into a pile of salt. (See, Genesis 19:26).

112. In the Parable of the ten virgins in Matthew 25: 1-13 Jesus tells a story of ten virgins traveling to a marriage feast. All ten virgins had lamp oil. Five ran out, and asked those who had oil to give them some. Those

with oil responded rightly by telling those without, no, go buy your own or we will not have enough ourselves. They did not even say sorry. Those who bought the lamp oil did not get back in time and were locked out of the marriage feast, meaning they went to hell.

113. I believe Jesus teaches us by this parable that: yes, we love others, and yes, we love ourselves, but we love God more, and live for God foremost not for self or others. Id.

114. Thus, we should obey the greatest command to love God by living for God and subordinately to love one another. Love does not encourage harm in this life and eternal life for mere material convenience. (See, Romans 13:10).

115. I am against the Death with Dignity Acts because I believe the most important time of our lives is at the end pursuant to the Bible. In Ecclesiastes 7:1, “the day of death better than the day of birth.” In Ezekiel, the Bible says if you do good all of your life and turn away from the good, none of the good will be remembered. In Ezekiel, it says if you do evil all of your life and turn away from the evil, none of the evil will be remembered. (See, Ezekiel 18:21-24, Also see Ezekiel 33:12-16). Further, in the Parable of the Sower in Matthew Chapter 13, only those who understood and kept

Democratic groups, as it would create the appearance of influence and favoritism in violation of the bible's teachings as we are called to serve everyone's best interests, not merely those who support us, or pay us with money or benefits such as signatures. We are not supposed to buy or barter for via collecting signatures or pay for party or people's favor, loyalty or support for allowance on the ballot either. That is a sin against God. (See, James 2:1, "do not show favoritism."); (James 2:9, "But if you show favoritism, you sin and are convicted by the law as transgressors."); (Deuteronomy 16:19, "Do not deny justice or show partiality. Do not accept any bribes, for a bribe blinds the eyes of the wise and twists the words of the righteous."); (Proverbs 18:5, "Showing partiality to the wicked is not good, nor is depriving the innocent of justice."); (Proverbs 24:23, "These also are sayings of the wise: To show partiality in judgment is not good."); (Malachi 2:9, "So I in turn have made you despised and humiliated before all the people, because you have not kept My ways, but have shown partiality in matters of the law."); (Job 34:19, "who shows no partiality to princes and does not favor the rich over the poor, for they are all the work of his hands?"); (Job 13:10, "Surely He would rebuke you if you secretly showed partiality.").

125. Paying the filing fee and/or accepting signatures or donations from individuals or groups, even democratic groups, creates an expectation of a return in violation of God's instructions. In Romans 13:8 the Bible teaches: "Owe nothing to anyone except for your obligation to love one another..." The acceptance of money from individuals and lobbyists creates an appearance that I am bought. The paying of the filing fee allows the Party to use the fee to buy the support of candidates or for candidates. That violates the bible's teachings on impartiality.

126. I believe it is wrong (a sin against God) for the Party to pay a team to support their interest or candidates.

127. I believe it is wrong (a sin against God) for the Party to donate to candidates, as it is likely to lead to buying of favors and influence in violation of my faith in God.

128. The filing fee is used to buy votes, by buying support. That is wrong. Votes should not be bought.

129. I believe it is wrong for candidates to teach people wrong by teaching the voters they earn support with money.

130. I seek to gain support with true leadership, love for others, by service to others by presenting my plans to take care of Americans relating to healthcare, social security, and the environment.

131. I believe the vote is the only non-corrupt, impartial means to show support or lack thereof.

132. No one knows how anyone votes, except them and their God unless they disclose it.

133. Thus, the right to vote, and to run for office without conditioning such right on eliminating another fundamental right, must be protected.

134. On an aside, to alleviate your fears, I understand there are not only checks and balances within the three branches of government, there are also internal checks and balances within each of the individual branches.

135. With the acceptance of the cloak of government authority, I understand my rights will be more limited in order to uphold the rights of those I hope to serve.

136. My rights to speak out on my faith will be more limited in order to uphold the religious freedoms of the American people should I be elected.

137. Americans should worship or not according to the dictates of their own conscience, not the dictates of the government.

138. I will treat everyone with respect regardless of religion, race, gender or place of origin. I am not scared to love outside of my own. I am commanded to.

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139. Since, I do not wish to violate the Bible's teachings on impartiality, I respectfully, request Defendants filing fees and/or signature requirements be waived under 15 Del.C. § 3103.

**III. POLITICAL PAST, A GLIMPSE OF CORRUPTION,
BARTERING & BUYING CANDIDATES, SERVING POWER AND
PROFIT INSTEAD OF PEOPLE**

140. I am a registered democrat.

141. I previously ran for office in 2018 for the State House of Representatives Seat for the 38th District as a Democrat.

142. I paid the filing fee during that time, and accepted donations from Democrats during that time. (See Exhibit, 31).

143. Due to religious reasons, in 2018, I only accepted donations from the formal Democratic groups.

144. In 2018, people told me we would get our filing fees back because that was the custom.

145. In 2018, no one running in Sussex received their filing fee back per the County Democrats.

146. In an Email attached hereto as Exhibit 32, dated September 18, 2018, I responded to Jane Hovington's determination and or the Sussex County Democrat's determination that no Sussex County Candidates would receive their filing fee back:

"Hi Dolce, Thank you for stepping up to help us. I am not accepting donations from anyone, but the Democratic party groups for religious reasons. I am a Christian. I do not want to violate Matthew 6 and support the false praise of President Trump for his alleged charitable works.

People in Sussex support him, though his conduct is not praise worthy. He is misleading so many people I love.

We should lay a foundation for success not only for this election, but for future elections. I'm disappointed the Democratic Party for the state has not helped me either. I grew up in Sussex. I was raised here. The reason why so many do not support our party is because they do not believe we support them. My neighbors lament that the democrats only care about upper Delaware, not lower Delaware. We have more people running on the democratic ticket this year than other years. If Sussex Democrats are merely concerned with the federal and Presidential elections, that actually may confirm the false beliefs of my neighbors and hurt the democrats down the line.

Democrats care about everyone, we are the party of inclusion. We care about the North, upper Delaware, and the South, lower Delaware, and everything in between.

Please help me, help you bring the blue back. Please help the other candidates too.

Thank you,
Meg" (See, Exhibit 32)

147. The County Democrats indicated they would support the national and federal elections not the county seats. They would not return the filing fees back like they allegedly did in prior years.

148. In addition, the 38th District kindly helped me by a donation. (See, Exhibit 33).

149. Yet, the 38th District misstated the amount the group was allowed to contribute to be a lower amount than the \$3,000.00, allowed limit per candidate.

150. I sent the 38th District members an email to correct the miscommunication of the amount candidates were allowed to receive was \$3,000.00 from democratic groups not a lesser amount. (See Exhibit 34)

151. I believe the fact the County Democrats did not support local candidates and the misstated lower fee of campaign limits evidences both the County Democrats and the 38th District Democrats were compromised into serving those who serve them, supporting those who support their pockets, or personal interests, not who will do what is right.

152. This is an example of why I believe the filing fees, and donations contribute to the corruption in politics, while also violating Jesus Christ's teachings. The fees and donations teach people to reflect the image of Satan, serving those who serve them thereby serving themselves, instead of seeking to do what is right, not self serving.

153. Please note, the emails relating to the 2018 examples, was before I became wiser. more educated and learned the corruption relating to paying filing fees was a wrong. It is a sin.

154. Sadly, I learned that Democrats try to buy different democrats too, thereby compromising their integrity and their eternal souls.

155. Thankfully, I believe there is no condemnation in Christ, so long as I turn away from the sin of paying the filing fee and accepting

volunteers or checks from the Democratic Groups too, and turn towards God's will.

156. I have since 2018, realized that paying the filing fee would violate Jesus Christ's teachings, and be a sin against God.

157. I have since 2018, realized that accepting volunteers, and donations, even volunteering signatures from the Democratic organization or others violate Jesus Christ's teachings too.

158. During 2018, I told the members of the 38th Democrats I would not take donations or give donations from individuals.

159. Many participants in the 38th District appeared to be involved in other groups and entities that asked for donations. Yet, I would not buy votes by giving money to those who purport to support me thereby sinning against God by supporting myself. Nor, would I accept money or volunteers from such group thereby allowing myself to be bought, or to become biased, or compromised by the desire to serve myself at the expense of those I hoped to be charged with serving.

160. I am priceless, not a price tag.

161. People are priceless not price tags, to be bought or bartered for with filing fees, donations, signatures, and such thereby compromising their integrity to do what is right instead of what is self serving.

162. Such groups have narrow interests, not necessarily focused on serving people outside of their own with additional and different interests, yet important too.

163. Thus, when members of groups, such as the Party, give donations to candidates, they compromise the candidates' ability to serve those they are charged to serve with the temptation to serve those who serve their seat instead.

164. I faced disdain and persecution related to my religious beliefs because of the unusual manner I campaigned back in 2018.

165. One of the head Democrats demeaned me in front of everyone at a meeting, Dr. Mohammad Akhter. (See, Exhibit 35, Also see Exhibit 38, regarding information relating to conflict with major campaign contributors to both parties, the healthcare industry, and the apparent agenda that Dr. Mohammad Akhter purported to support).

166. Even more insultingly, I discovered most of the people at the meetings did not read my campaign material or the few articles I drafted in the local paper, the Coastal Point

167. I believe some of the powerful democratic members only cared about what they could personally get out of me, and not anything beyond that, including how well I could serve. (Reflecting the image of Satan. (See,

Isaiah 14:13-14.); (Cf, Matthew 23:11 "The greatest among you is your servant." Servants of self are not great. They mislead and deceive those they purport to serve to serve themselves instead. Good leaders teach those they serve to be great too, by teaching them to serve one another not exploit and harm one another to serve greed.).

168. In 2018, I was invited to a meeting by official members of a Democratic group, where I thought the Democrats of the 38th District were offering their support, financial and otherwise because they said they were going to help me out. Instead, to my horror, they asked me not to run for the 38th House District Seat after I expended my time, effort and own personal funds on material. (Exhibit 35).

169. The powerful few democrats who chose to be involved in party picking in the 38th District thought they could buy my seat by offering to return my filing fee, and offering an alternative to run for another office, such as the Recorder of Deeds, with a waiver of filing fees.

170. They were wrong to think I was running to gain power. I ran because I wanted to make a positive difference in the lives of those I had hoped to serve via drafting and amending laws to serve people and to protect them from exploitation by those who serve greed. Mere power is not what I seek,

171. I contacted Jane Hovington, a big whig in the Sussex Democratic Party, concerning her lack of support or knowledge of my legislative agenda. (Exhibit 36, concerning emails and the attachments thereto, relating to our communications).

172. To my horror, many of those within the party did not educate themselves about local candidates, including myself. It seemed like a mere job that some were paid to care about, and their concern did not go beyond their paid support.

173. At one instance at the Democratic headquarters, I tried to calm down a member (herein referred to as "the Member") of the Democrats after she called Robert Arlett ugly words.

174. I said we should adhere to Michelle Obama's saying "When they go low. We go high."

175. The Member responded by pointing her finger at the door of the headquarters for me to get out, while indicating she had more experience and I knew nothing because of my youth.

176. I left the Democratic headquarters.

177. I forget the Member's exact words, but I communicated with Jane Hovington ("Jane"), who observed this event concerning this event.

178. Instead of comforting me after such harsh remarks, Jane instead sympathized and thus encouraged the misbehavior based on the Member's fleeting feelings, instead of encouraging the Member to control her feelings (instead of allowing them to control her), and to respect others, including me, regardless of age and apparent experience in politics.

179. I forget what the exact words the Member said, but I followed up with the attached email to Jane Hovington in addition to contacting her by phone, from a number I no longer have.

180. I sent Jane the scripture regarding let no one demean you because of your youth, with a picture of the attendees at the meeting where the event occurred. The lady sitting next to me, wearing the Carper shirt, was the lady who forced me to leave. I do not know her name, but it is notable I saw her picture is on a sign on Route 26 near Hockers, advertising the health industry. This is the industry I desire to draft laws to prevent the massive killing and bad care I have learned about throughout history, and via recent history, by inter alias its contribution to the addiction crisis and the alleged molestation of babies by Dr. Bradley in Delaware. (Exhibit 37).

181. Jane openly professes her faith in Christianity. So, I did not fear offending her by citing the Bible.

182. I also sent the attached emails to Jane concerning her, and thus the Democrats, lack of support for my campaign. (Exhibit 36).

183. On the day of the election, I visited all of the voting stations in the 38th District in lower Delaware.

184. To my horror, most of the voting stations only handed out the attached anti corruption handout, not the handout with my platform. So, the stations did not allow voters to read about the good I hoped to do. Instead, they merely were able to read my anticorruption hand outs that cited the Bible and the fact I would not participate in fundraising events due to my belief in Jesus Christ's teachings. So, it made me look unusual and possibly weird or offensive to those who do not believe the same on the most important day, election day. (See, Exhibits 21 and 22).

185 In fact my anticorruption handout did upset someone early on.

186. Prior to the election in 2018, I received free training in Dover where someone looked at my material and scolded me. She was offended by my quote from Jesus Christ on the anticorruption brochure relating to the fact I was not going to attend fundraising events. She said she was going to support me, but was no longer supporting me because of the quote. She was so angry at me. (See, Exhibit 21).

187. Sadly, I amended my brochures to change the word temple into "places of worship" or something similar, since she was Jewish. I did not desire to offend her. I merely desired to obey Jesus Christ by not participating in fundraising.

188. The anticorruption handout originally included, in part:

"I was thinking about doing fundraising at restaurants, but changed my mind when someone asked me to go to a dinner fundraiser because it would be good for my campaign.' I immediately thought of the scripture. "Everything they do is done for people to see...They love the place of honor at banquets and the most important seats in the **temple**; they love to be greeted with the respect in the marketplaces..." Matthew 23:5-7. "(emphasis intended).

189. I changed the handout to replace "temple" with "[places of worship]" in a revised handout providing, in part:

"I was thinking about doing fundraising at restaurants, but changed my mind when someone asked me to go to a dinner fundraiser because it would be good for my campaign.' I immediately thought of the scripture. "Everything they do is done for people to see...They love the place of honor at banquets and the most important seats in the **[places of worship]**; they love to be greeted with the respect in the marketplaces..." Matthew 23:5-7. " (See Exhibit 21, emphasis intended).

190. I felt sad for changing Jesus Christ's words based on the discomfort it caused others, and one lady specifically.

191. On election day in 2018, as I visited each of the voting stations in the 38th District in Delaware, I also saw the boards I created for each of

the stations were knocked down. So, people could not read the newspaper articles or brochures I placed on the boards.

192. I lost the election in 2018. I had little support from the Democrats. Though some offered to hand out papers for one day, but required my mother and I to perform their job of handing out all the Democrats papers to certain listed locations. So, they used me for their personal agenda instead of supporting me, which reflects the corruption in politics. (See Exhibit 44, a picture of one of the people offering to hand out my material with my mother, only in exchange that I hand out other Democrats stuff, thereby reflecting the corruption in politics (while violating the Bible's teachings), by doing what is self serving, not what is right.)

193. Jesus, in Matthew 6 teaches "Do not give your (charitable) alms seen. Do not be like the hypocrites." When you give charitable love "do not know your left hand from your right hand," meaning do not give out of one hand to get out of the other. Giving to get something in return, such as asking folks to volunteer signatures or donations or to door knock, in exchange for something, such as supporting their personal desires instead of what is best for the people, not only compromising the integrity of the candidates running for office, it also misleads and deceives people to harm and hell, under the guise of good.

194. Jesus teaches do not charity give seen period. I believe people are damned to hell because of the deception volunteering, including volunteering signatures, volunteering donations, fundraisers, girl scout cookie sales, car washes, alleged charitable races, school pizza drives, donations to organized groups or organized charities, go fund me pages and the like wrongly teaches people.

195. It is no small sin. Teaching giving to get, is unconditional charitable love, wrongly drives out the love from the hearts of man, the God from the hearts of man because "God is Love", and replaces it with the love of money, or the desire to serve self, instead of unconditionally loving and respecting others, without requiring they earn it.

196. This evil done under the guise of charitable good teaches people wrong. The Bible teaches people go to hell because they learn wrong, and do not unlearn deception as truth. People go to hell because of their hard-hearted ignorance, misunderstanding, and for not knowing truth. Not knowing is not innocence. It is evidence of guilt, not caring to know, caring to love. Even children may be damned to hell on judgment day. To confirm, pull Ezekiel Chapter 9. (See, Isaiah 44:18 regarding "stupidity and ignorance" that damns); (Also see, Ephesians 4:18, Romans 1:21); Also see, Matthew 13 the Parable of the Sower, only those who understood were

fruitful, not to be burnt up, meaning damned to hell for eternity); (See Isaiah 9:16, "For the leaders of the people mislead them, and those they guided are led astray.").

197. People wrongly learn giving money seen, or volunteering seen, or volunteering signatures is good, and somehow contributes to good, even though I believe it contributes to corruption, and thus contributes to evil. People praise those who volunteer signatures, volunteer time, and donations as good, as making a difference.

198. Meanwhile, I think giving charity or volunteering signatures or otherwise seen or conditionally is evil. I believe the vote is the only noncorrupt, uncompromised form of voicing support.

199. Poor people may not have the resources to volunteer such as vehicles or gas money. Poor people may not have the money to donate. So, people who are misled into thinking giving seen is good wrongly learn to think poor people cannot be good because they do not contribute or give seen.

200. The next thing you know, people are condemning the poor they hypocritically profess to be helping by charity, by evil thoughts and words, calling them names or thinking they are bad, lazy deadbeats and the like.

201. By giving charity seen, I believe people sin against God and man and mislead people to harm and hell by teaching the world business is charitable love.

202. There is no sin in mere business.

203. The sin includes misleading, wrongly teaching people by example, by the example Defendants require I adhere to under 15 Del.C. § 3103, that business is love and thereby replacing the unconditional love in the hearts of men with the love of money or the desire to be served instead of to serve.

204. Since, Jesus teaches you cannot serve God and money, I believe such deception misleads people to hell. It is not okay.

205. Paying the filing fee would be a sin against God by such bad example.

206. I believe the filing fee money will be used in activity I believe misleads and deceives others to hell. I do not want to encourage conduct that communicates something evil is ok thereby harming those I seek to serve.

207. The freedom of speech, includes my freedom not to speak by communicating what I believe is a satanic, eternal life-threatening message

by paying the filing fee or asking people to volunteer donations or signatures only to compromise their eternal souls.

208. I believe the filing fee may also be used to pay people, prostituting them to support whoever they are paid to support, by door knocking, calling people, and other tasks, all I see as paid corruption, in violation of my religious beliefs. (Reflecting the image of Satan under the guise of good.). Far worse, the money may be used to help pay for other candidates' materials and campaigns, in a sense, buying the candidates loyalty to serve those who support or fund the candidates' campaigns instead of serving those they are charged to serve. Teaching the candidates to I believe reflect the image of the devil misleading them to hell should they not repent.

209. I contacted all 541 members of the Federal Congress by various diverse means in an attempt to garner support for impeachment. (Exhibit 40).

210. I personally drafted 4 drafts of articles of impeachment to impeach President Trump on. (See Exhibit 18).

211. I started a 5th Article of impeachment. (See Exhibit 18).

212. I sent the articles to most of the House Judiciary Committee. (See Exhibit 40, This Exhibit includes additional Emails to the Judiciary Committee).

213. I also emailed, and mailed them out to a few other members, including but not limited to Representative Rochester, Senator Coons, and Senator Carper.

214. I hand delivered copies of the articles to Representative Rochester's office in Sussex County as well.

215. I even faxed various members of congress the articles too.

216. I spent hours calling members of congress about impeachment.

217. I also called members of congress to confirm whether they received a post cards I sent to all 541 members.

218. Many of the staffers had no idea what I was talking about.

219. Both Senator Coons and Representative Lisa Rochester responded to my communications indicating it was not the appropriate time to impeach. (See, Exhibit 41).

220. I learned the leaders, or shall I say those I believe to be misleaders in congress, wasted people's time, which is more precious than gold, by encouraging people to merely feel like they were contributing or

making a difference by investing hard work, and effort to contact those in office.

221. I discovered many congressmen and congresswomen focused on looking good, making people feel good without actually doing good, which I believe is no good.

222. So, I will not waste people's time by encouraging people to contact me when I know I will be working hard. So, I will not have time to read their hard work, should I hold a public seat.

223. I contacted President Obama more than once and received boilerplate responses. If you look at the attached Exhibit 42, you will see the same letter sent to me twice. In one letter President Obama called my Linda by mistake. So, I think they send letters out without actually reading what voters send in. I hope others do not waste time contacting representatives like I did. (See, Exhibit 42).

224. I believe many leaders in congress teach people to praise evil as good, by praising what serves their seat by serving those who donate and volunteer for them, instead of what is right. That is wrong. I do not want to be like them. I choose to be who I am, "not conformed to the world, but transformed by the renewing of my mind." (Citing Romans 12:2).

225. I remember reading about someone in the paper who was involved in the chicken business, who donated 1.8 million to cancer center, when he **may** have caused the pollution creating the cancer by his involvement in certain tasks in the chicken industry, thereby profiting two wrong doers, overcharging health care providers who at times conceal and kill, instead of heal, and people who profit off of the life threatening pollution they cause by such marketing, bought good will, and trading and or buying favors or bartering for political loyalty. (emphasis intended).

226. I believe such charity as the donation to a cancer center I read about in the paper, violates Matthew 6 and misleads people to harm and hell.

227. Throughout American history, I believe politicians and charities such as the Rockefellers have served Satan and have caused harm and eternal damnation to many under the guise of good.

228. I keep myself separate. Scripture says "Be holy because (God) is holy. Jesus says be perfect like your heavenly father is perfect. That means do not sin just because everyone else does. Evil is still evil, even when the masses are misled into believing evil is good. (See, Leviticus 20:26, Leviticus 11:44, Leviticus 19:2, Leviticus 21:8, 1 Peter 1:16, relating to be Holy because I (God) am Holy, See, Matthew 5:48 Jesus commands "Be perfect, therefore, as your heavenly father is perfect." Also see, 2

Corinthians 6:17 "separate yourself from them" meaning do not sin like they do.).

229. I think some Delaware democrats and republicans in office may be bought with donations or support by those who profit off of wrong doing, poisons or poisoning, like hospitals who profit off of sick people, polluting chicken plants, polluting farms, polluting factories and Artesian who profit off of dirty water, while committing Matthew 6 violations, creating conduct that I believe not only harms people, but damns them to hell.

230. I believe it is satanic when people only will help you if you compromise your soul, instead of doing what is right, because it is right, or when they only seek what is self serving and sell whatever that is to the masses under the facade of right.

231. I am repulsed when leaders sometimes plead ignorance when foreseeable harm results. Yet, ignorance is not innocence. Leaders often ignore the foreseeable harm. They choose not to care, or far worse pretend not to know when they do because they exploit economic, social and political strains for their own gain instead of alleviating strains to care for the people they are charged to serve.

232. I do not believe the same way as others. I do not think the same way. I should not be persecuted for my diverse religious beliefs.

233. I experienced persecution from people from Republicans too, including my opponent Ron Gray during the burying of the hatchet parade per the attached email. Representative Ron Gray and his three companions were so mean to me that I started to get teary eyed. I jumped out of the very slow-moving convertible during the parade. Honorable Senator Coons Secret Services men, Officer Hughes, and Senator Steve Smyk kindly rescued me that sad day. (Exhibit 43).

234. I sent Jane an Email concerning the above referenced mistreatment during the 2018 parade. I sent her pictures of Ron Gray and I smiling before I entered the vehicle and it became ugly, pictures of Steve Smyk without me, a picture of me in Ron Gray's vehicle, and a picture of me in Steve Smyk's vehicle. (Exhibit 43).

235. Even though I am a democrat, Senator Smyk showed me great kindness and showed the world true leadership by loving those outside of his own, as did the heroic Officer Hughes who is respectful to all people, and Senator Coons' secret service men, including Shawn.

236. Doing the right thing takes courage because many people often want what is self serving immediately, not what is right.

237. I believe we are commanded to be the light of the world because we know God. Others do not know God. So, we are to shed light

on other people's feet to prevent harm here and damnation into eternity. God loves other people too.

238. I believe the entire command summed up is to love God and love one another. Yet I think people confuse praising sin, flattery, encouraging fleeting feelings or fancies or providing false assurance or saying "do what you want," instead of saying do what is right, as love. Hurting yourself or others is not good because God loves you and loves others too even non-Christians. So, it is a sin against God. See, Matthew 22:36-40, Also see, John 13:34, John 15:17.

239. Yet people want to do what they want to do, without love for God, others or at times even themselves, thus reflecting the "lawless one" Satan, leading to harm and hell. (Citing, 2 Thessalonians 2:8).

240. Scripture teaches me to "Have nothing to do with the fruitless deeds of darkness, but rather expose them. It is shameful even to mention what the disobedient do in secret. But everything exposed to light becomes visible and everything illuminated becomes clean." Citing Ephesians 5. I believe this means that the darkness is transformed into light, saving by transformation the wrongdoers into right-doers thereby saving their souls by such painful correction. I believe we are called to guide those in darkness

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to love people, not material things, money or merriment to the extent they hurt precious people God loves to gain the world.

241. I am not willing to exchange my soul to gain the world or a place on the ballot by teaching darkness is light by collecting donations or signatures or paying the filing fees, and that light is darkness by choosing not to love God enough not to make my personal case for Jesus Christ. (See, Matthew 16:26. Jesus says "For what profit is it to a man if he gains the whole world, and loses his soul? Or what will a man give in exchange for his soul?"), (Also see, Isaiah 5:20 "Woe to those who call evil good and good evil, who put darkness for light and light for darkness, who put bitter for sweet and sweet for bitter.")

242. I believe leaders should care about other people more than serving their seats or winning an election. (Matthew 23:11).

243. When leaders care about winning and serving themselves more than the people they purport to serve, they mislead those they serve to reflect this same image, the image of Satan too, misleading them to harm and hell.

IV. PLAINTIFF'S FUTURE INTENT

244. I also intend to run as a Democrat in future races, beyond 2020.

245. I have a desire to run for office in order to draft just laws to serve God.

246. Jesus Christ indicated "justice, mercy and faithfulness" are greater, more important, commands than rules relating to mere material things or money. (Matthew 23:23).

247. Throughout scripture in the Bible and by the grace of God through the Holy Spirit, I learned the difference between unjust decrees and just laws.

248. Unjust laws teach people to love money, profit and pleasure to the extent people are willing to harm, and exploit others to serve greed.

249. This not only causes economic harm, and potential harm to human life and health, it also causes eternal harm. " You cannot serve money and God." (Luke 19:45). Those who serve greed go to hell.

250. Unjust leaders teach people to focus on money and merriment, fleeting feelings, fleeting fancies and fleeting funding. They teach people to reflect the image of Satan by living for self and for those who affect them, thereby living for self like Satan, without reflecting love, (the image of God because "God is Love"), to others outside of their own or God (because God loves other people too). Per Isaiah 14-13-14, Satan wanted to be his own God.

251. I believe people who live for self and their own families and their own people without love for others or God because God loves others

too are sadly children of the devil, not yet adopted by the God that loves them and seeks to save these confused kids from the misbehaving dad, the devil, who seeks to harm them, others and damn them to hell. (See Matthew 13:38 regarding "children of the evil one"); (See, John 8:44 and 1 John 3:10 Regarding "children of the devil"); (See, Ephesians 2:2 regarding "obeying the devil"); See, Romans 8:15 and 8:23, Ephesians 1:5, Galatians 4:5, relating to adoption from the bad dad that damns).

252. Unjust leaders teach people to reflect the image of Satan, called the "lawless one" by wrongly teaching everyone is for themselves, their own, without laws teaching people to care about (love) others. (Citing, 2 Thessalonians 2:8).

253. Just laws teach people to care about one another by correcting folks in court when they harm others to serve greed.

254. Laws are a tool judges and lawyers may use for good or evil, for justice or injustice, for love of humanity or for the love of money, a.k.a. greed.

255. I think of judges like Judge Clark, of the Court of Common Pleas, as super heroes, eternal life savers, because he corrects people and never condemns them. Like a loving father I heard him scold a defendant saying " I know you can make better choices. I am disappointed. You

know better." Judge Clark encourages faith, not despair, hope, not discouragement, building up with correction, not tearing down with condemnation. He saves lives and eternal lives and reflects what I think a super hero is.

256. I hope to draft laws to correct wrong doers in hopes to transform them into right doers, and to also heal victims of the wrongdoers misdeeds.

257. I desired to run for office back in 2018, because no legislator would fix the problems I presented to them, with the solutions I presented.

258. I was not able to unhardened the legislators' hearts to get them to care outside of themselves.

259. Specifically, I discovered misbehavior relating to out of state title companies who practiced law without a license, costing Delaware a lot of untaxed revenue and allegedly causing mistakes in the chain of title in real estate transfers, per other lawyers too.

260. I contacted various legislators for help on this issue.

261. Only one law maker seemed to be interested in helping me.

262. Sadly, he seemed to be interested in me personally. When I said no thank you regarding a personal relationship, he stopped helping me.

(See Exhibit 45).

263 I made it clear my request for legislative help was only a professional interest for a specific purpose, not a personal relationship.

264. I drafted an Article in the Coastal Point shedding light on this problem and offering a solution in the July 6, 2018 issue of the Coastal Point, called *Candidate discusses title companies' issues* . (See, Exhibit 46).

265. To date, no one has fixed the misbehavior relating to the out of state title companies practicing law without a license, thereby costing Delaware additional revenue that could be used to help the schools instead of increasing taxes and thereby forcing more Delawareans into foreclosure.

266. On an aside, I also contacted every single School District in this state and the General Assembly with a proposal to save the schools without increasing taxes. (See, Exhibit 47).

267. Only Senator Steve Smyk kindly responded with support for my proposal to save the schools. I was so touched by his compassion for the schools, especially since he is a Republican, and I am a Democrat. Note, this was before the parade where this Senator allowed me to ride in his vehicle instead of Representative Ron Gray's.

268. My belief in serving God by seeking justice, seeking what is right, unconditionally, even if it does not help me, admittedly makes me

different from other politicians. I am not easily manipulated by money, power or fear.

269. I have a fire in my belly to drive out darkness with light, injustice with justice, hate with love, ignorance with truth, and death with life.

270. That fire will not die should someone else gain the seat in 2020.

271. So, I seek a waiver from the Defendants in future elections as applied to me too.

272. I have never met anyone else who believes the same as I. So, I doubt anyone else will reject, money, volunteers, or signatures. Thus, I am seeking a waiver from Defendants, for a future election, limited to me, as a class of one, under the Equal Protections Clause, as well.

**COUNT I DEFENDANTS VIOLATE THE EQUAL PROTECTIONS
CLAUSE AS APPLIED TO MEGHAN KELLY'S
FREEDOM OF RELIGION**

273. Meghan Kelly repeats and incorporates by reference all the above paragraphs and all the below paragraphs, as though set forth herein in the first instance.

274. The Fourteenth Amendment prohibits states from depriving any person of life, liberty, or property without due process and **equal protections of the law**. (emphasis intended).

275. Any state law that conflicts with the Constitution under the equal protections clause, as applied, is preempted, unenforceable and unlawful to so apply.

276. Defendants deprive me of **equal protections of the law** by the unconstitutional condition precedent as applied to me, in this class of one, by requiring that I condition my right to the free exercise of my religion or the surrender of my right to seek office. (emphasis intended).

277. The application of the filing fee and or signature requirements clearly under 15 Del.C. § 3103, violate my unique religious beliefs in this class of one.

278. The Defendants refuse to remove, waive, or exempt me from the requirements under 15 Del.C. § 3103 that conflict with my religion, thereby essentially punishing me for my belief in Jesus Christ by denying the benefit of the ability to run for office without violating my religion.

279. Defendants unlawfully discriminate against me by persecuting me based on my religious beliefs in Jesus Christ by requiring I disobey Jesus

Christ to qualify to run for office as a Democrat in the US House of Representatives in the upcoming election.

280. Defendants unconscionably require I sell my soul to Satan by disobeying Jesus for the opportunity to gain a seat in the US House of Representatives by mandating adherence to 15 Del.C. § 3103.

281. I communicated my religious beliefs to Defendants.

282. Yet they refuse to comply with the equal protections clause by their stiff necked enforcement of 15 Del.C. § 3103, as applied to me.

283. My life, liberty and pursuit of happiness is protected under the constitution.

284. Life, liberty and pursuit of happiness are more precious than money and is afforded greater protection under our Constitution than mere money.

285. The Liberty interest to worship or not is according to the dictates of my own conscience, not the dictates of Defendants' convenience, profit and power or the dictates of the Party's convenience, profit and power, as they exercise activities that are so traditionally the exclusive prerogative of the state that they constitute state action even undertaken by a private individual or individual. Running an election for public office has been found to be such an exclusive public function. (See, Terry v Adams, 345 US

461, County political group whose candidate almost runs unopposed in primary and general election cannot discriminate.).

286. Defendants require I adhere to the dictates of their convenience, profit and power, rather than uphold my fundamental rights from Defendants' abuse and persecution of me based on my different religious belief by essentially preventing me from the ability to run for office because of my belief in Jesus Christ.

287. The Constitution limits Defendants' conduct and application of laws, to prevent such abuse. It does not give them a license to abuse or persecute.

288. The First Amendment provides "Congress shall make no law respecting an establishment of religion, or **prohibiting the free exercise thereof.**" (emphasis intended).

288. Defendants are punishing me, on the basis of my religious beliefs by denying benefits to, and, or imposing burdens upon me in order to be placed on the Democratic ballot in the state of Delaware, in violation of the free exercise clause, as applied to me, in this class of one.

289. Defendants violate my First Amendment right to the free exercise of my religion, applicable to Defendants by the Fourteenth Amendment, in that Defendants condition my right to the free exercise of

my religion or the surrender of her right to seek office, by unlawful application of 15 Del.C. § 3103.

290. Defendants unlawfully discriminate against me based on my religious beliefs in Jesus Christ by requiring I disobey Jesus Christ to qualify to run for office as a Democrat in the US House of Representatives in the upcoming election.

COUNT II DEFENDANTS VIOLATE THE EQUAL PROTECTIONS CLAUSE AS APPLIED TO MEGHAN KELLY'S FREEDOM OF SPEECH

291. Meghan Kelly repeats and incorporates by reference all the above paragraphs and all of the below paragraphs, as though set forth herein in the first instance.

292. Defendants' forced payment of filing fee and/or signature collection requirement(s) pursuant to 15 Del.C. § 3103, is requiring forced speech repugnant to my belief in Jesus Christ.

293. Such forced speech requires I disobey Jesus.

294. Freedom of speech includes freedom not to speak. (See, West Virginia State Board of Education v Barnette, 319 U.S. 624 (1943), The government cannot require people to salute the flag or display other measures with which they disagree.); (Also see, Wooley v Maynard, 430 US 705 (1977), A motorist could not be punished for blocking a portion of

his license plate that conflicted with his beliefs.); (Also see, *Tinker v Des Moines Independent Community School District*, 393 U.S. 503 (1969), This extends to symbolic acts such as wearing arm bands to protest the war. Students could not be forced to remove their bracelets to essentially feign support for something they opposed.).

295. The Defendants by requiring I compromise Jesus Christ's teachings, in order to adhere to a mere regulatory measure, 15 Del.C. § 3103, thereby require I **communicate** a message I believe leads those I hope to serve to harm and hell, or relinquish my right to run for office, violate my freedom of speech.

296. The Filing fee is not benefiting me and I believe it harms those I hope to serve. (Distinguish from cases where the government may require a fee for a program that benefits the person such as Board of Regents University of Wisconsin v Southworth, 529 U.S. 217 (2000).).

297. The Defendant requires I pay a fee for the purpose of the fee, in part, to subsidize speech that I finds offensive, in violation of my freedom of speech applicable to the Defendants under the First and Fourteenth Amendments.

298. None of the filing fee, Defendants require to be paid to the Party, benefits me personally.

299. In fact, I believe the filing fee will be used by Defendants to fund speech to harm me and others by misleading those I seek to serve to harm and hell by buying candidates to serve the few personal desires of a few powerful members Democrats, the Party. I believe that any and all such spending teaches people to violate Jesus Christ's teachings under the facade of good.

300. Defendants deprive me of **equal protections of the law** by an unconstitutional condition precedent as applied to me, in this class of one, which requires that I condition my right to the free speech or the surrender of my right to seek office.

COUNT III DEFENDANTS VIOLATE THE EQUAL PROTECTIONS CLAUSE AS APPLIED TO MEGHAN KELLY'S FREEDOM OF ASSOCIATION

301. Meghan Kelly repeats and incorporates by reference all the above paragraphs, and all of the below paragraphs, as though set forth herein in the first instance.

302. Defendants violate my First Amendment right to the free exercise of my affiliation, and/or right to run for office made applicable to the states by the Fourteenth Amendment, in that Defendants condition my right to the free exercise of her religion or the surrender of her right to seek

office with the blessing of the Party and Party Chair, by unlawful application of 15 Del.C. § 3103

303. I am a Democrat, in part, because they support and safeguard for laws that teach respect for all people regardless of religion, gender, age, race, origin or place of origin.

304. The Defendants, the Party and the Party Chair violate what the Democrats stand for by their refusal to grant me a waiver, exempting me from the filing fee and or signature requirements, under 15 Del.C. § 3103, although the Party and Party Chair are empowered to do so, and in this case required to do so as not to violate my belief in Jesus Christ under the equal protections clause.

305. The Defendants have no compelling interests in requiring the signature requirement or filing fee be paid under the statute, other than their corrupt use of the money to serve their own power and profit.

306. The Democratic party is the party of inclusion and diversity, where the members respect the diverse views of others.

307. The Party and the Party Chair's determination does not reflect the beliefs of all Democrats, including my own.

308. I should not be forced to conform my speech to the dictates of a few, the Party, and the Party Chair, to associate as a Democrat, in order to be placed on the ballot, by supporting speech I find offensive.

309. Defendants deprive me of equal protections of the law by an unconstitutional condition precedent as applied to me, in this class of one, which requires that I condition my right to the freedom to associate as a democrat by complying with the Party's and the Party Chairs requirements under 15 Del.C. § 3103, or the surrender of my right to seek office.

310. In addition to or in the alternative of, Defendants deprive me of the equal protections of law, in that Defendants by enforcement of 15 Del.C. § 3103, conditioned my right to seek office to conform to the bartered, bought, biased profit and power of the few powerful Democrats in the Party, instead of respecting the diversity of those within the Democratic party, by in this case, respecting my diverse beliefs as a loyal lifelong Democrat, to the party, not the few people in power in this party or their ever changing positions.

**COUNT IV DEFENDANTS VIOLATE THE EQUAL PROTECTIONS
CLAUSE AS APPLIED TO MEGHAN KELLY'S
FREEDOM TO RUN FOR OFFICE**

310. Meghan Kelly repeats and incorporates by reference all the above paragraphs and all of the below paragraphs, as though set forth herein in the first instance.

311. By refusing to place Meghan Kelly on the Democratic ballot for the US House of Representatives, without conditioning such right by eliminating one of her other fundamental rights, the citizens will be denied a choice. That injury is irreparable.

312. While, the Supreme Court has found that the interest of running an efficient election supports a requirement that candidates obtain a reasonable number of signatures to get on the ballot, that does not take into account the fact gathering signatures violates my personal belief in Jesus Christ, so as to violate my freedom of religion under the First and 14th Amendments, as applied to me. *Norman v Reed*, 502 US 279 (1992).

313. The vote is the only non-corrupt form to show support for candidates running for office, and must be protected in general, and specifically in this case from the corruption relating to bartering for signatures or buying of support to gain the mere opportunity to serve the public in office.

314. Defendants violate my First Amendment rights, applicable to Defendants, by the Fourteenth Amendment, in that Defendants condition my

right to right to seek office, on the surrender of my free exercise of my religion, speech, and or affiliation., with no least restrictive alternatives as applied to me.

315. Meghan Kelly, a person, a class of a person of one, of a different unique religious belief should not be forced to choose between the exercise of my Constitutionally protected rights or the relinquishment of the right to run for office without violating such fundamental rights protected under the Constitution.

316. The right to vote, and to run for office without conditioning such right on eliminating another fundamental right, must be protected, against Defendants unlawful application as applied to me.

317. The Defendants and the state have less of an interest in governing party activities than in governing elections in general. See, *Eu v San Francisco County Democratic Committee*, 489 US 214 (1989).

318. The Defendants do not have a compelling reason to enforce 15 Del.C. § 3103, against me, in this class of one, so as to violate my freedom of religion, association, religion, and related rights.

319. The Defendants do not leave alternative choices less burdensome to my freedom religion, association, religion, and related rights.

320. Defendants enforcement of 15 Del.C. § 3103 against Meghan Kelly is not necessary for an important or compelling interest.

PRAYER FOR RELIEF

WHEREFORE, Meghan Kelly respectfully requests that this Honorable Court:

1. Enter an Order to permanently enjoin and restrain Defendants from enforcement of the filing fee and signature requirements under 15 Del.C. § 3103 against Plaintiff, so as not to violate Plaintiff's religious beliefs;
2. Enter an Order of a Writ of Mandamus requiring Defendants to exempt Plaintiff from the filing fee and signature requirements under 15 Del.C. § 3103 in future elections, so as not to violate Plaintiff's religious beliefs in future elections;
3. Enter an Order requiring Defendants to place Meghan Kelly's name on the Democratic Ballot for the U.S. House of Representatives for the upcoming 2020 primary for the State of Delaware, and if applicable, the general election;
4. Enter an Order requiring Defendants shall, at their earliest convenience add Meghan Kelly to the absentee ballots for the U.S. House of

Representatives for the State of Delaware, and, if applicable, shall mail such revised absentee ballots to all persons previously provided absentee ballots, is granted in this matter.

5. Enter an Order awarding Plaintiff costs, to the extent authorized by law and other such relief as the Court deems proper and just, if applicable.

Dated: 3/2/20

LAWYER

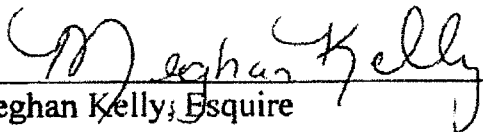
/s/Meghan Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
(772)332-9719
pro se
Bar Number 4968

EFiled: Mar 03 2020 10:00AM EST
Transaction ID 64781595
Case No. 2020-0157-



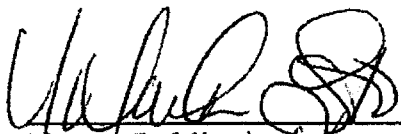
VERIFICATION

I, Meghan Kelly, Esquire, on behalf of myself, verify that the facts set forth in the foregoing *Verified Complaint of Meghan Kelly*. are true and correct to the best of my knowledge, information and belief.

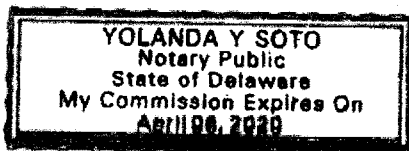


Meghan Kelly, Esquire

SWORN TO AND SUBSCRIBED before
Me this 28 day of Feb., 2020.



Notary Public
Printed Name: Yolanda Yvonne Soto
My Commission Expires: April 6, 2020



EXHIBIT

3

Sent from my iPhone

Begin forwarded message:

From: "Balke Jeannie (Courts)" <Jeannie.Balke@state.de.us>
Date: February 22, 2012 at 11:59:29 AM EST
To: Meg Kelly <meghankellyesq@yahoo.com>
Subject: RE: Sponsor for the United States Supreme Court

I called to check on the spelling of your name on the wall of the Supreme Court -- I was told it has been corrected. Have a nice day!

-----Original Message-----

From: Meg Kelly [<mailto:meghankellyesq@yahoo.com>]
Sent: Tuesday, February 21, 2012 3:10 PM
To: Balke Jeannie (Courts)
Subject: RE: Sponsor for the United States Supreme Court

Dear Ms. Balke,

Thank you so much for checking with Justice Ridgely. Additionally, thank you for your suggestions.

I appreciate your time and help.

On a separate matter, I had the pleasure of being admitted to the DE bar by the Honorable Henry DuPont Ridgely. Unfortunately, I was concerned that my request to be admitted by affirmation as opposed to being sworn in was not honored. I made a special request with Ms. Holland, and yet it was not honored.

I know it sounds silly but I am a Christian and I actually believe in the bible. So, I've felt guilty years later because the bible provides, "Above all, my brothers, do not swear-- not by heaven or by earth or by anything else. Let your 'Yes' be yes, and your 'No' be no, or you will be condemned." NIV James 5:12.

The bible further provides, "Do not swear at all: either by heaven, for it is God's throne; or by the earth, for it is his footstool: or by Jerusalem ... Simply let your 'Yes' be 'Yes,' and your 'No,' be 'No' anything beyond that comes from the evil one." NIV Matthew 5:34-37.

To make matters worse, my name was misspelled on the wall of the Supreme Court. I know there's nothing I can do about how I became licensed in DE, but I was hoping I could somehow fix my name on the wall of the Supreme Court.

I have a family full of successful attorneys, and I am but a peon, still starting out. I can't believe I am related to the Mark Braden who coined the term "soft money." And my cousin Ikey Adams works where the President met his wife, Sidley Austin, and my deceased Grandpop has a plaque at Pittsburgh Courthouse as the infamous public defender "Battle Ship Bob." Nonetheless, I am proud to be the first female attorney in my family, and it would mean the world to be to correct the spelling of my name. So, I could someday show my future children and grandchildren that they can do anything if they stay determined. I brought it up with Ms. Holland a couple of times, but to the best

of my knowledge it has not been corrected.

Thanks again for asking Justice Ridgely for help. I appreciate your kindness.

Very truly,
Meg Kelly, Esq.

ps. It's silly that we swear on the bible, when the bible instructs us not to swear. Could you ask the judges whether they would consider swearing in witnesses and admittees by using the term "do you swear or affirm." That way it may prevent heartbreak and regret. Thank you.

— On Mon, 2/20/12, Balke Jeannie (Courts) <Jeannie.Balke@state.dc.us> wrote:

From: Balke Jeannie (Courts) <Jeannie.Balke@state.dc.us>
Subject: RE: Sponsor for the United States Supreme Court
To: "Meg Kelly" <meghankellyesq@yahoo.com>
Date: Monday, February 20, 2012, 2:43 PM Hello Meg - I wanted to get back to you to let you know that Justice Ridgely will only sponsor those attorneys that he knows personally -- usually through clerkships. Perhaps you could contact the U.S. Supreme Court Clerk's office to get of list of those that may be able to sponsor you. Best of luck to you!

-----Original Message-----

From: Meg Kelly [<mailto:meghankellyesq@yahoo.com>]

Sent: Wednesday, February 15, 2012 1:17 PM
To: Balke Jeannie (Courts)
Subject: Sponsor for the United States Supreme Court

Dear Honorable Henry DuPont Ridgely,

I am seeking to be admitted before the United States Supreme Court,

and I am hoping you will be willing to be one of my sponsors.

Would you please consider sponsoring my admission before the United States Supreme Court?

Thank you so much for your time and consideration.

Very truly,

Meg Kelly, Esq.
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
302-537-1089
Licensed DE, DC & PA

DE Bar # 4968

EXHIBIT

4

MEGHAN MARIE KELLY, ESQUIRE
34012 Shawnee Drive
Dagsboro, DE 19939
(302) 537-1089

The Honorable Peter B. Jones
Family Court of the State of Delaware
The Family Court
22 The Circle
Georgetown, DE 19947

December 10, 2009

Dear Honorable Peter B. Jones:

Thank you for taking time to meet with on December 9, 2009. Per your kind suggestion, I respectfully request that the Family Court of the State of Delaware in and for Sussex County remove my name from the rotating list of attorneys who are required to represent clients in family law proceedings due to religious reasons.

The practice of family law is against my religious beliefs. I am a Christian, and I find guidance in the Bible. The Bible provides: “[W]hat God has joined together, let man not separate.” *Citing*, NIV Mark, 10:9, and *Citing*, NIV., Matthew 19:6; *also see*, NIV., Malachi 2:16 (“I hate divorce”); NIV Genesis 2:20 (“man will ... be united to his wife, and they shall become one flesh); and, 1 Corinthians 7:10-11, (“A wife must not separate from her husband.” ... “And a husband must not separate from his wife.”).

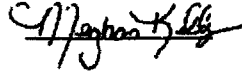
In November, to my horror, I was appointed to a guardianship proceeding. I believe such a proceeding contributes to separating “what God has joined together,” because instead of the child bringing the parents together, the guardianship proceeding usually separates a child from one of the parents, and reinforces any division between a couple.” *Id.* Accordingly, it contributes to the break of a union that God has made.

Since, I didn't want to contribute to the destruction of a union created by God, I attempted to find another attorney who could replace my appointment with no success. As a result, I contacted this Honorable Court and communicated my views and this Honorable Court kindly relieved me of the appointment.

I respectfully request that I be relieved of all appointments relating to family law proceedings. Thank you for your time and consideration.

Very truly,

Meghan Kelly, Esquire

A handwritten signature in cursive script that reads "Meghan Kelly".

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939
(302) 537-1089

The Honorable Chandlee Johnson Kuhn
Family Court of the State of Delaware
New Castle courthouse
500 N. King Street, Suite 9445
Wilmington, DE 19801

October 10, 2012

Dear Honorable Chandlee Johnson Kuhn:

Thank you for excusing me from a recent appointment in October 4, 2012. I respectfully request that I also be removed from all future appointments relating to family law due to religious reasons.

The practice of family law is against my religious beliefs. I am a Christian, and I find guidance in the Bible. The Bible provides: “[W]hat God has joined together, let man not separate.” *Citing*, NIV Mark, 10:9, and *Citing*, NIV., Matthew 19:6; *also see*, NIV., Malachi 2:16 (“I hate divorce”); NIV Genesis 2:20 (“man will ... be united to his wife, and they shall become one flesh); and, 1 Corinthians 7:10-11, (A wife must separate from her husband.” “And a husband must not separate from his wife.”).

I believe that any proceeding contributing to the separation of “what God has joined together,” the destruction of marriage, is against my personal Christian beliefs. In addition to divorce proceedings, participating in guardianships and termination of parental rights proceedings also conflict with my religious beliefs because instead of the child bringing two parents together, such proceedings usually separates a child from one or both of the parents, and reinforced any division between the couple. *Id.* Accordingly, it contributes to the break of a union that God has made.

Since, I do not wish to contribute to the destruction of a union created by God, I respectfully, request that I be relieved of all appointments relating to family law proceedings. Thank you for your time and consideration.

Very truly,

/s/Meghan M. Kelly
Meghan Kelly, Esquire
DE Bar Number 4968
34012 Shawnee Drive
Dagsboro, DE 19939

EXHIBIT

5

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939
(302) 537-1089

The Honorable Henry DuPont Ridgely
Supreme Court of Delaware
502 South State Street
Dover, DE 19901

RE: INFORMAL COMMENTS ON CLE

October 1, 2012

Dear Justice Ridgely:

Thank you for participating in the CLE. I enjoyed it immensely. However, I had some concerns.

I was concerned by the appearance of some of the speakers' partiality towards Delaware attorneys. Every attorney that comes before a Delaware Court should be treated the same regardless of where they are from. The Court should not take a Delaware attorneys word over an out of state attorneys word solely on the illogical basis that the Delaware attorney is from Delaware.

I was also concerned about the comment that a judge let an out of state attorney practice pro hac vice because they were from a "respectable firm." I think all attorneys should be held by the same standard regardless of the size or reputation of the firm. They should be looked at as individual attorneys who will potentially have influence within the courts in this state.

On the other hand, I was very impressed by your graceful demeanor. You did not show partiality, nor did you support the above referenced remarks. Instead you sat back silently like a wisdom filled father observing all behavior. Thank you for being a good model for judges and attorneys.

Unfortunately, I have seen partiality towards Delaware attorneys in my practice. In fact during my first appearance in this state a judge accused me of being a "Philadelphia lawyer," as if this was a bad word.

I also worked with Delaware lawyers who grew up in other states, and I was surprised that some lawyers treated me differently because I grew up here. They would treat me with respect, lend me forms offer to meet me for lunch etc...Conversely, I recall how some Delaware attorneys mistreated my former non-native colleague by condescendingly describing "how things are done in Delaware" and "the Delaware way." I recall with disappointment that some Delaware lawyers even used bad language to discuss the Delaware way. I think such language and partiality makes Delaware attorneys look bad. Although it's nice to be given preferential treatment because of where I grew up it does not make it right.

On a personal note, one of the reasons why I became a lawyer was my faith, Christianity. Under my faith, Jesus Christ was executed for no lawful purpose. Instead he died as a result of the passion of the people instead of logic and reason under the law. That is wrong. The judicial system should remain impartial, and individuals should not face such irrational persecution. Nonetheless, this is not the case in our world. That is why I went to law school. And that is why I think it's important to bring my concerns relating to partiality before this Honorable Court to you.

You are the law and all attorneys including myself will strive to adhere to this Honorable Courts wishes. Further, you are the law for all of the lower courts as well. Accordingly, all judges will also strive to adhere to your wishes. Will you please consider discussing the importance of being impartial to your peers?

Thank you for being a good role model and for making a positive impact on Delaware attorneys and Delaware Courts, and thank you for considering my comments.

Have a good week.

Very truly,

/s/Meg Kelly
Meghan M. Kelly
34012 Shawnee Drive
Dagsboro, DE 19939
(302) 537-1089
DE #4968

EXHIBIT

6

Sent from my iPhone

Begin forwarded message:

From: Meg Kelly <meghankellyesq@yahoo.com>
Date: March 31, 2017 at 10:21:23 PM EDT
To: Meg Kelly <meghankellyesq@yahoo.com>, Matty R Kosiorek <matthewkosiorek@comcast.net>
Subject: Fwd: DEFEATING ISIS/ISIL

Sent from my iPhone

Begin forwarded message:

From: Meghan Kelly <meghankellyesq@yahoo.com>
Date: September 3, 2015 at 10:07:42 AM EDT
To: "Wescott, Jymayce (Carper)" <Jymayce_Wescott@carper.senate.gov>
Subject: Re: DEFEATING ISIS/ISIL

Thank you! You are wonderful!

Very truly,
Meg

Sent from my iPod

On Sep 3, 2015, at 9:58 AM, "Wescott, Jymayce (Carper)" <Jymayce_Wescott@carper.senate.gov> wrote:

Busy morning – Thanks: I will pass on to our DC office.

JWescott
Jymayce Y Wescott
Constituent Services Director
Office of US Senator Thomas R. Carper
12 The Circle
Georgetown DE 19947
302 856-7690
302 856-3001 - Fax

Connect with Senator Carper online:

[<image001.png>](#) [<image002.png>](#) [<image003.png>](#) [<image004.png>](#)

From: Meg Kelly [<mailto:meghankellyesq@yahoo.com>]
Sent: Thursday, September 03, 2015 9:17 AM

To: Wescott, Jymayce (Carper) <Jymayce.Wescott@carper.senate.gov>
Subject: Fw: DEFEATING ISIS/ISIL

Thank you for your kindness and open mind Jymayce.

Per our discussions, my cousin Tim is in the Middle East, and is in charge of a prison camp. I think more violence may be fuel to ISIS's flame. Thank you for forwarding this information to the Honorable Senator Carper.

Best regards,
Meg Kelly, Esq.

Licensed DE, DC, PA, US Supreme Court

<http://www.skadden.com/professionals/tim-t-mastrogicomo>

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

From: Meg Kelly <meghankellyesq@yahoo.com>
To: WRDE <charleswatson@wrde.com>
Sent: Friday, July 10, 2015 10:14 PM
Subject: DEFEATING ISIS/ISIL

How do we defeat ISIS, not with blood, but with education. More blood will be fuel for their fire since people are being deceived that they are doing God's will by killing others and, if they should die they will go to heaven.

You have the power to prevent deception with the truth.

Last month, ISIS allegedly killed 27 Muslims during a Muslim holiday which prohibits violence, (at a mosque). ISIS is using God's name in vain, for it's own vanity and purpose by manipulating youngsters, and poor people to fight, fund and feed it's organization. ISIS is not adhering to the Koran. ISIS is like the mob. They adhere to no true religion that loves any God. They are their own Gods. People give the aid nations send to them to ISIS so they are not killed. It is logically incomprehensible that this cycle continues.

Let's educate people concerning ISIS's use of the name of God for their own purpose (NOT GOD'S). Please consider talking about this in order to prevent such deception and brainwashing. Would you be willing to talk about ISIS's use of God's name in vain (similar to the church's use during the crusades, Spanish Inquisition and arguably colonization for profit not for Christ, as acknowledged recently by our Pope recently)?

CSPAN had a program where witnesses explained that ISIS stole artifacts from countries and tried to sell them. Days later, on the regular news I saw alleged threats from ISIS and evidence of the destruction of certain artifacts. This is a brilliant way to increase demand and sell/save the artifacts for more money. CSPAN would permit you to use clips of the witnesses if you made a request.

Contact.IC-SPAN.org

Contact | C-SPAN.org

Contact Main Office 400 N. Capitol St., NW Suite 650 Washington, DC 20001
(202) 737-3220 (Mon-Fri 8:30am-5:30pm ET) Program Inquiries & Suggestions

Viewer Inquiries :

Visit us at www.c-span.org

Preview by Yahoo

I don't think bloodshed will logically solve threats to our Nations security or prevent harm to people in other countries.

As a result, it's also a bad idea to train others to fight as we cannot control them and more blood will not bring peace. I have heard politicians request the US send weapons and train certain Sunnis (they believe a caliph can come from someone outside the lineage of Muhammed) so they can fight ISIS an alleged sect of Shites (they believe the caliph must come from the lineage of Muhammed).

Say the trained Sunis succeed. They have been killing people of the same faith who allegedly love the same God because they disagree about who should lead their people. What's stopping the potential trained fighters from killing people with more fundamental differences like Jews and Christians if they are so willing to kill people of the same faith?

I think you have more power to stop violence through education than anyone else. Please think about it.

I imagine last months massacre at the mosque gave ISIS a lot of bad press, as today on yahoo news saw member of ISIS allegedly providing food to the poor. See, <http://news.yahoo.com/offers-mix-brutality-charity-during-ramadan-053544476.html>

If ISIS in fact did this, it was probably an attempt to create positive publicityer last months poor decision.

I am sad about such unnecessary deaths. Will you please think about reporting on this? I have loved ones out there, and I do not want our troops to be in harms way unnecessarily.

Thank you,
Meg

EFiled: Sep 22 2020 12:57PM EDT
Transaction ID 65953103
Case No. 2020-0809-



EXHIBIT

7

**SAVE FREE
SPEECH
ARTICLE OF
IMPEACHMET**

§ 227. Wrongfully influencing a private entity's employment..., 18 USCA § 227

United States Code Annotated

Title 18. Crimes and Criminal Procedure (Refs & Annos)

Part I. Crimes (Refs & Annos)

Chapter 11. Bribery, Graft, and Conflicts of Interest (Refs & Annos)

18 U.S.C.A. § 227

§ 227. Wrongfully influencing a private entity's employment decisions by a Member of Congress or an officer or employee of the legislative or executive branch

Effective: April 4, 2012

Currentness

(a) Whoever, being a covered government person, with the intent to influence, solely on the basis of partisan political affiliation, an employment decision or employment practice of any private entity--

(1) takes or withholds, or offers or threatens to take or withhold, an official act, or

(2) influences, or offers or threatens to influence, the official act of another,

shall be fined under this title or imprisoned for not more than 15 years, or both, and may be disqualified from holding any office of honor, trust, or profit under the United States.

(b) In this section, the term "covered government person" means--

(1) a Senator or Representative in, or a Delegate or Resident Commissioner to, the Congress;

(2) an employee of either House of Congress; or

(3) the President, Vice President, an employee of the United States Postal Service or the Postal Regulatory Commission, or any other executive branch employee (as such term is defined under section 2105 of title 5, United States Code).

CREDIT(S)

September 23, 2016

Coastal Point

35

IRSD: Bracelets at high school just a joke in 'poor taste'

Parents told they shouldn't be concerned

By Laura Walter
Staff Reporter

Indian River School District officials said this week that the blue bracelets making their way around Indian River High School on Sept. 19 were nothing more than a bad joke.

Several students were distributing blue rubber bracelets printed with the words "Kill yourself" and a swastika, ac-

ording to district officials.

"I think there were three kids who ordered these things — like 200 of them. I think they were trying to be funny," said IRSD Assistant Superintendent Mark Steele.

The students reportedly dispersed bracelets to other classmates. Counselors and administrative staff members then spent several hours collecting the bracelets back. They also met with the students involved and their parents, Steele said.

"We wanted to make sure there was nothing deeper here than just a couple

kids making a dumb mistake," he said.

There was "absolutely no meaning to it at all," Steele asserted, noting that the counselors spoke with the teenagers, just to be sure. Most students laughed it off as they turned the bracelets in, Steele said, and the day ended well.

"We don't have anything parents should be concerned about," he added. "They got ahead of it pretty quickly. I would refer to it as a poor-taste joke."

It can be frustrating for schools trying to promote a safe atmosphere, since "schools try to do everything possible, and then you just get companies that'll

print anything," Steele said.

However, counselors are there for any student having trouble or feeling depressed.

"If there's anything there, anybody feels the need to talk to a counselor — by all means, talk to a counselor." Parents with questions or concerns are being encouraged to call their student's principal or an assistant principal.

Online resources are available by visiting www.irsd.net/home, selecting the "Parents and Students" tab, and clicking "Bullying and Suicide Prevention Resources."

DSP Explorers program to hold open house Sept. 27 at Central

The Delaware State Police Explorers program consists of young men and women who have an interest in law enforcement.

The group participates in fingerprinting young children at community events, works the missing children's area at the State Fair, and many more community events. They also offer opportunities for the National Law Enforcement Exploring Conference and the Federal Leadership Academies, as

well as Delaware State Police Cadet Program.

The Explorers program teaches a variety of police procedures, including fingerprinting, evidence collection and patrol procedures.

"We strive to lead them down the right path and stand as positive role models. We also plan to instill leadership, responsibility, integrity and commitment," DSP representatives noted. Every Explorer Post is overseen and

run by Delaware State Police troopers.

Minimum qualifications include a 2.0 grade point average, and Explorers must be mature, clean-cut, as well as clean-shaven, with no criminal convictions. This is not a discipline program. The age range is 14 to 20 and at least in ninth grade. The program consists of high school and college students.

Open houses for the program are planned at DSP troops statewide this month, with the first

Troop 4 (Georgetown) and Troop 7 (Lewes) at 6 p.m. on Tuesday, Sept. 27, at Sussex Central High School in Georgetown.

All interested students should be prepared to submit a \$50 program registration fee at the open house. Checks or cash are accepted. They will also need a copy of last year's grades. For those younger than 18, a

Dining

Continued

vegetables, and seven

Guest Column

Kelly: Chilling free speech is not cool

By Meghan Kelly, Candidate
Delaware House of Representatives,
38th District

My name is Meghan Kelly. I am an attorney running for the House of Representatives in the 38th District's Tuesday, Nov. 6, 2018, election.

As I candidate for a state position, I have witnessed people in positions of authority misuse their authority to unconstitutionally chill the freedom of political speech. This is no small matter. An attorney can sue people to correct such chilling of 1st Amendment rights, but what will that do? They can take all of their possessions and money. None of that — not all the money in the world — is worth as much as the freedoms we have here in our nation.

Men fought wars for the freedoms we all hold dear. Mere money cannot buy their lives back. Men did not die for money. The American dream is not about finding a job, buying a home, providing for and raising a family. People all over the world aspire for that.

The American dream is much more than merely making money, providing for your family and surviving. What

makes the United States of America the dream of so many is Americans' universal respect of other people's freedoms when they step foot on our land.

What makes America great is the people. What makes America great is Americans' universal respect for the freedoms of speech, assembly, religion and association, regardless of race, religion or place of origin.

When people in positions of authority choose not to behave like Americans by respecting the rights of others (emphasis intended), that is when America becomes less great. And yet, I have hope and faith that the people will courageously and kindly confront such behavior with correction, not with more bad behavior.

I am writing about one instance where my freedom of speech was quashed. I attended a celebration for a town. When I arrived beforehand, someone working the event said they knew who I was and talked politics, demeaning my party. I attempted to respond to the discussions, but the mayor and other agents of the Town requested that I didn't.

I told the mayor his request was unconstitutional, but I complied. I was instructed by those with the blanket of

authority not to discuss politics at the party. They mentioned the other candidate could not attend.

A couple hours later, I attended the Town's party at the town hall — open to the public, thereby creating a limited public forum. Solicitors of various groups sat with pamphlets, including a church, at the celebration. I did not ask for a table or a place to sit with those handing out materials. I merely desired to respond to political statements and questions.

Yet, I complied with the mayor's request, making it clear that such request was not constitutional.

The mayor's position of authority made his personal requests to refrain from exercising American freedoms more dangerous than a normal citizen.

We all have limits to our freedom of speech, but people in government, and those with authority, have even more limits in exchange for such power, to preserve the freedoms of those they serve. Otherwise, unconstitutional government restraints may inhibit the freedoms of those they serve, by causing fear of persecution.

The constitutional rights and standards differ relating to the type of

See KELLY page A15

Kelly

Continued from page A14

forum where the speech is limited. Is it a private forum, public or limited public forum? Municipalities may use their police power to draft reasonable regulations for the public safety relating to private property. However, private property that is opened up to the public is converted to a limited public forum, where content based speech is not easily limited.

In 1980, the U.S. Supreme Court held that a large shopping store could not limit the freedom of speech, regardless of how disagreeable the speech was to the owner of the grocery store, under the facts of that case. In that case, a private forum was opened up to the public during certain hours, just like many stores are opened to the public. Thus it became a limited public forum where speech is under greater protection than a private forum.

My speech was quashed on public property, opened up to the public for a public event.

The constitutional standards differ not only with regards to the forum, where the freedom of speech may have been infringed upon, but it also differs concerning whether it was restrained by conduct-based restrictions or content-based restrictions.

Conduct-based speech may be limited in a limited public forum by time, place and manner restrictions under a relatively easier standard than the content-based restrictions. Content-neutral restrictions must advance important interests unrelated to the suppression of speech, and must not burden substantially more speech than necessary to further those interests.

In 2010, our Third Circuit ruled it was unconstitutional for a mall to discriminate against noncommercial speech in favor of commercial speech, as this was content-based not content-neutral speech.

Content-based restrictions are presumptively unconstitutional. The government must prove such restriction is necessary to serve a compelling state interest, and is narrowly drawn to achieve that end. Mere open debate

concerning political speech does not meet that standard. The freedom to speak freely about politics and other important issues, such as religion, without persecution of the government, is why many people desire to come to America.

There are limits to our freedom of speech, such as false advertising, defamation and obscenity.

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

I keep thinking to myself, men died for this freedom. No amount of money or power is as precious as those men's lives, and the freedoms they bravely fought for. If men are willing to die and kill for this, I should have the courage to confront and correct people in authority so as to honor those men, and to remind the world that they mattered, and to protect what they fought for, not money, but freedom. You can't buy that. It is priceless.

Thank you for honoring our brave

by honoring the freedoms they fought for, including the freedom of speech.

Fenwick
Fox's Pizza Den

Try Our
NEW MENU ITEMS
Using Fresh Local
Produce & Fresh
Local Catch!

Lunch Special

September 23, 2016

Coastal Point

IRSD: Bracelets at high school just a joke in 'poor taste'

Parents told they shouldn't be concerned

By Laura Walter
Staff Reporter

Indian River School District officials said this week that the blue bracelets making their way around Indian River High School on Sept. 19 were nothing more than a bad joke.

Several students were distributing blue rubber bracelets printed with the words "Kill yourself" and a swastika, ac-

ording to district officials.

"I think there were three kids who ordered these things — like 200 of them. I think they were trying to be funny," said IRSD Assistant Superintendent Mark Steele.

The students reportedly dispersed bracelets to other classmates. Counselors and administrative staff members then spent several hours collecting the bracelets back. They also met with the students involved and their parents, Steele said.

"We wanted to make sure there was nothing deeper here than just a couple

kids making a dumb mistake," he said.

There was absolutely no meaning to it at all," Steele asserted, noting that the counselors spoke with the teenagers, just to be sure. Most students laughed it off as they turned the bracelets in, Steele said, and the day ended well.

"We don't have anything parents should be concerned about," he added. "They got ahead of it pretty quickly. I would refer to it as a poor-taste joke."

It can be frustrating for schools trying to promote a safe atmosphere, since "schools try to do everything possible, and then you just get companies that'll

print anything," Steele said.

However, counselors are there for any student having trouble or feeling depressed.

"If there's anything there, anybody feels the need to talk to a counselor — by all means, talk to a counselor." Parents with questions or concerns are being encouraged to call their student's principal or an assistant principal.

Online resources are available by visiting www.irsd.net/home, selecting the "Parents and Students" tab, and clicking "Bullying and Suicide Prevention Resources."

DSP Explorers program to hold open house Sept. 27 at Central

The Delaware State Police Explorers program consists of young men and women who have an interest in law enforcement.

The group participates in fingerprinting young children at community events; works the missing children's area at the State Fair; and many more community events. They also offer opportunities for the National Law Enforcement Exploring Conference and the Federal Leadership Academies, as

well as the Delaware State Police Cadet Program.

The Explorers program teaches a variety of police procedures, including fingerprinting, evidence collection and patrol procedures.

"We strive to lead them down the right path and stand as positive role models. We also plan to instill leadership, responsibility, integrity and commitment," DSP representatives noted. Every Explorer Post is overseen and

run by Delaware State Police troopers.

Minimum qualifications include a 2.0 grade point average, and Explorers must be mature, clean-cut, as well as clean-shaven, with no criminal convictions. This is not a discipline program. The age range is 14 to 20 and at least in ninth grade. The program consists of high school and college students.

Open houses for the program are planned at DSP troops statewide this month, with the

Troop 4 (Georgetown) and Troop 7 (Lewes) at 6 p.m. on Tuesday, Sept. 27, at Sussex Central High School in Georgetown.

All interested students should be prepared to submit a \$59 program registration fee at the open house. Checks or cash are accepted. They will also need a copy of last year's grades. For those younger than 18,

Dining

Continued

vegetables, and several

116 TH CONGRESS

1ST SESSION

Impeaching Donald J. Trump, President of the United States, of high crimes and misdemeanors.

_____, 2019
_____ submitted the following resolution; which was referred to the _____

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RESOLUTION

Resolved, That Donald J. Trump,

President of the United States, is impeached for high crimes and misdemeanors, and that the following Articles of Impeachment to be exhibited to the Senate:

Articles of Impeachment to be exhibited by the House of Representatives of the United States of America in the name of itself and all of the people of the United States of America, against Donald J. Trump, President of the United States, in maintenance and support of its impeachment against him for high crimes and misdemeanors.

ARTICLE I

THE PRESIDENT'S VIOLATION OF CRIMINAL LAW PURSUANT TO TITLE 18 OF THE UNITED STATES CODE, SECTION 227

In his conduct while President of the United States, Donald J. Trump (herein also referred to as "President" or "Trump"), in violation of his constitutional oath to faithfully execute the office of President of the United States and, to the best of his ability, preserve, protect, defend and obey the Constitution of the United States, as well as his constitutional

obligation to preserve, protect, defend and obey the laws of the land, including the Federal Criminal Statute 18 U.S.C.A. § 227.

No one is above the law. No one is below the law.

Not even the President of the United States is free to willfully violate criminal laws without Constitutional justification.

The President by his words and/or deeds violated the criminal law Title 18 of the United States Code, Section 227.

Pursuant to 18 U.S.C.A. § 227,

"(a) Whoever, being a covered government person, with the intent to influence, solely on the basis of partisan political affiliation, an employment decision or employment practice of any private entity--

(1) takes or withholds, or offers or threatens to take or withhold, an official act, or

(2) influences, or offers or threatens to influence, the official act of another,

shall be fined under this title or imprisoned for not more than 15 years, or both, and may be disqualified from holding any office of honor, trust, or profit under the United States.

(b) In this section, the term "covered government person" means--

(1) a Senator or Representative in, or a Delegate or Resident Commissioner to, the Congress;

(2) an employee of either House of Congress; or

(3) the President, Vice President, an employee of the United States Postal Service or the Postal Regulatory Commission, or any other executive branch employee (as such term is defined under section 2105 of title 5, United States Code)."

The President is specifically listed as a "covered government person" under this criminal law under 18 U.S.C.A. § 227(a), (b)(3).

The President withheld an "official act" to faithfully defend and protect the NFL Players' Constitutional freedom of speech against government persecution, as required under this statute.

The President not only "withheld an official act" to defend, protect and

obey the United States Constitution by defending the NFL Players' protected first amendment freedom, he also violated NFL Players' freedom from government persecution by actively persecuting, ridiculing and, or encouraging the ridicule and firing of the NFL players, and or the boycott of certain teams based solely on the Players' perceived, projected or manufactured political affiliation against Trump and/or Trump's base or alleged American political values. Citing, 18 U.S.C.A. § 227(a)(1).

The President's withholding of such official act and active violation of the same was made with "the intent to influence, solely on the basis of the perceived or projected partisan political affiliation of NFL players derived from their peaceful protest, an employment decision or employment practice of" private entities, NFL teams. Citing, 18 U.S.C.A. § 227 (a).

The President also, "influence(d), or offer(ed) or threaten(ed) to influence, the official acts of," others in his staff, government agents, troops, service men and women, and congressmen and congresswomen, as well as all Americans, when he encouraged others to persecute, ridicule, demean, or boycott the NFL players and teams for exercising their freedom of speech. Citing, 18 U.S.C.A. § 227 (a)(2).

The President's encouragement was made with "the intent to influence, solely on the basis of the perceived, or projected partisan political affiliation, against President Trump and/or his supporters and/or American values, an employment decision or employment practice of" private entities, NFL teams. Citing, 18 U.S.C.A. § 227 (a).

In September 2017 and thereafter, President Trump called for NFL Players, (herein also referred to as "NFL" and "Players"), to be fired for speech exhibited by kneeling during the national anthem before NFL football games to peacefully protest against the government's disparate mistreatment against black Americans in the criminal justice system and the government's use of lethal force against black Americans, including unarmed children (herein also referred to as "protest(s)" or "peaceful protest(s)").¹

¹ (See, The Tennessean, part of the USA Today Network, President Trump: NFL teams should fire players who protest national anthem, By Natalie Allison and Joel Ebert, Sept. 22, 2017, <https://www.tennessean.com/story/news/2017/09/22/president-trump-nfl-teams-fire-players-protest-national-anthem/695666001/>; also see, The Washington Post, Roger Goodell responds to Trump's call to fire, By, Jeremy Gottlieb Sept. 22, 2017, https://www.washingtonpost.com/news/early-lead/wp/2017/09/22/donald-trump-profanelly-implores-nfl-owners-to-fire-players-protesting-national-anthem/?utm_term=.f8156e8f2075).

Certain NFL Players (also referred to as "Players" or "NFL") kneeled during the National anthem at football games to protest, in part, various individual policemen's shootings, killings and murders of unarmed black Americans, including black American children.

The conduct was not an attack on all police.

The peaceful protest was made, in part, against individual bad choices by individual policemen that cost the families, the community and our country the lives of little American children and Americans.

The peaceful protest was made to prevent future needless deaths of Black Americans and, including innocent children.

Our Constitution protects life, liberty and pursuit of happiness of all people, even little black children.

Trump gained support by those who became fearful, defensive and combative in response to the NFL player's peaceful protest.

Those people failed to recognize the peaceful nature of the protest.

Trump gained support of people who did not recognize the protest was not against police, whites, America, Trump or other people. The protest was made, in part, to show that the black Americans who died were worthy of love and life, and that no black American's life should be wrongfully taken.

The color of the American's skin does not make their deaths less tragic, and yet, there has been a surge of police ^{of attacks against} more black Americans than other Americans killed unlawfully by government agents.

The black lives matter movement was created to show America that those black lives do matter. People of all colors are worthy of love and respect, and are inherently "created equal" in the eyes of our constitution.

Throughout the nation, we have seen attacks against the black lives matters movement with the all lives matter movement, the police lives matters movement, white lives matter movement and other movements, all of which are constitutionally protected.

Nevertheless, the nongovernment attacks against the peaceful protests and black lives matter movement have helped Trump gain support.

The teenagers gave them to Black kids in response to the Black lives matters bracelets.

Trump wants to win.

Trump recognizes he gains more support by attacking the peaceful Constitutionally protected protest of the NFL Players.

Trump's conduct was made solely on the "basis of partisan political affiliation" attributed to the NFL players peaceful protest by Trump and specific part of the base that supports Trump.

In September of 2016, at Indian River High School located in Delaware, teenagers brought in about 200 bracelets with the words "Kill yourself" next to a Nazi symbol. ²

Such speech is not protected speech.

The use of violence by Neo Nazies, KKK, white supremacists and other people is unprotected.

The authority of a policeman's badge, or a military or national guard position cannot convert such violence into protected activity.

The peaceful protest by the NFL players is a beautiful Constitutionally protected way to protect innocent people against unconstitutional unprotected government speech and violent acts.

The NFL's peaceful protest is Constitutionally protected.

President Trump's speech persecuting, ridiculing the NFL players is not Constitutionally protected speech.

President Trump disobeyed the Constitution in order to garner more political support.

President Trump's behavior was based solely on serving himself by attributing the NFL player's peaceful protest to a partisan political affiliation against America and troops, despite the fact the freedom to peacefully protest is one the freedoms our beloved troops fought so bravely to preserve and defend.

The President not only violated the NFL Players first Amendment right of

² See Coastal Point, IRSD : Braceletes at high school just a joke in poor taste, By Laura Walter, September 23, 2016.

speech, he also violated their perceived or projected freedom of association against the President and or his views.

~~Americans are more free to speak and share our views without fear of persecution by the government because of the First Amendment.~~

~~Americans are more free to speak and share our unique views without fear of persecution by the government.~~

Americans are free to protest despite their perceived or projected partisan political affiliation against the government.

What makes America great is Americans' universal respect for the freedom of speech, assembly, religion and association regardless of race, religion or place of origin.

The Players' first amendment freedom of speech affords them protection from government persecution for exercising their first amendment right to peacefully protest against government conduct.

Pursuant to the Supreme Court in McDonald v. Smith, 472 U.S. 479, 486-87, 105 S. Ct. 2787, 2791-92, Citing New York Times Co. v. Sullivan, 376 U.S. 254, 270, 84 S. Ct. 710, 721, 11 L. Ed. 2d 686 (1964),

"The first amendment specifically protects speech against government acts and decisions citizens may disagree with. As with the freedoms of speech and press, exercise of the right to petition "may well include vehement, caustic, and sometimes unpleasantly sharp attacks on government and public officials," and the occasionally "erroneous statement is inevitable." New York Times Co. v. Sullivan, supra, 376 U.S., at 270-271, 84 S.Ct., at 720-721. The First Amendment requires that we extend substantial " 'breathing space' " to such expression, because a rule imposing liability whenever a statement was accidentally or negligently incorrect would *487 intolerably chill "would-be critics of official conduct ... from voicing their criticism." 376 U.S., at 272, 279, 84 S.Ct., at 721, 725.1"

When Trump accepted a position of government authority, under our Constitution, his Constitutional rights became more limited in order to uphold the Constitutional rights of those he serves, the American people.

The Constitution limits the power of the government in order to safeguard the freedom of those who reside in America.

Trump, as president, may not unconstitutional chill the NFL Players' speech based on perceived, projected political affiliation of the players based on

their protest.

The freedom of speech gives Americans the freedom to voice their disagreement with government actions and ideas, including the right to protest against government violence towards black Americans by government agents, and the right to protest the disparate treatment of black Americans by some specific instances of individual conduct while acting under the cloak of government authority including specific attorney generals, police and judges.

The United States Supreme Court held, "Criticism of (a government official) conduct does not lose its constitutional protection merely because it is effective criticism and hence diminishes their official reputations." *New York Times Co. v. Sullivan*, 376 U.S. 254, 272-73, 84 S. Ct. 710, 722, 11 L. Ed. 2d 686 (1964).

Trump is the President of the United States.

Trump represents through his deeds and words, the government in the executive branch.

The Government through Trump's deeds and words unconstitutionally persecuted the NFL Players for exercising their first amendment freedom.

Trump violated his oath to uphold the Constitution by actively disobeying the Constitution by persecuting the NFL Players for exercising their Constitutional right to peacefully protest.

Trump intended to cause the threat of economic harm to the NFL teams and against the players who participated in the peaceful protest.

Trump has called for the firing of NFL players for protesting.

Trump encouraged fans to walk out of a game if a player protested during the anthem.

Trump encouraged fans not to purchase NFL tickets when NFL players chose to kneel.

Trump has called for the boycott of the purchase of their teams' NFL tickets.

Trump caused economic damage, including but not limited to cancelled ticket sales, lost profit at concession stands and related NFL affiliated businesses, lost ratings on TV and, or other economic harm.

Trump's words and deeds chilled the NFL Players' protected speech.

Trump said "Wouldn't you love to see one of these NFL owners, when somebody disrespects our flag, to say, 'Get that son of a b---- off the field right now. Out. He's fired. He's fired!'" Id.

Trump stated "You know, some owner's going to do that,' Trump continued. 'He's going to say, 'That guy who disrespects our flag, he's fired.'" Id.

Trump stated, "But you know what's hurting the game more than that?" Trump said. 'When people like yourselves turn on television and you see those people taking the knee when they are playing our great national anthem.'" Id.

Trump stated "The only thing you could do better is if you see it, even if it's one player, leave the stadium, I guarantee things will stop. Things will stop. Just pick up and leave. Pick up and leave. Not the same game anymore anyway.'" Id.

"The NFL policy says a club will be fined if team members on the field during the anthem do not stand, and that the commissioner 'will impose appropriate discipline on league personnel who do not stand and show respect for the flag and the anthem.'"³

"During Thursday's games, however, a few NFL players knelt during the anthem. Others raised their fists during the song or remained in the locker room." Id.

"The NFL said in a statement ...that it has agreed with the NFL Players Association to delay implementing work rules that could result in players being disciplined while discussions between the league and the union on issues around the anthem continue." Id.

On Aug. 10, 2018, the President tweeted, "The NFL players are at it again - taking a knee when they should be standing proudly for the National Anthem. Numerous players, from different teams, wanted to show their "outrage" at something that most of them are unable to define. They make a fortune doing what they love....." Id.

On August 10, 2018, the President also tweeted, ".....Be happy, be cool! A football game, that fans are paying soooo much money to watch and enjoy,

³ (Citing, ABC News, Trump blasts NFL players for kneeling during anthem: 'Stand proudly or be suspended without pay, By Kelsey Walsh August 10, 2018, <https://abcnews.go.com/Politics/trump-blasts-nfl-players-kneeling-national-anthem-suspended/story?id=57131857>)

is no place to protest. Most of that money goes to the players anyway. Find another way to protest. Stand proudly for your National Anthem or be Suspended Without Pay!” Id.

The President is misleading the nation as to what makes America great. It is not money and wealth, but freedoms that make America already great.

Men fought wars for the freedoms we all hold dear, including the freedom to peacefully protest. Mere money cannot buy their lives back. Men did not die for money.

The American dream is not about finding a job, buying a home, providing for and raising a family. People all over the world aspire for that.

The American dream is much more than merely making money, providing for your family and surviving. What makes the United States of America the dream of so many is Americans' universal respect of other people's freedoms when they step foot on our land.

What makes America great is the people. What makes America great is Americans' universal respect for the freedoms of speech, assembly, religion and association, regardless of race, religion or place of origin.

The freedom to speak freely about politics and other important issues such as religion, without persecution of the government, is why many people desire to come to America.

When people in positions of government authority choose not to behave like Americans by respecting the *rights of others* (emphasis intended), that is when America becomes less great.

Trump made America less great by chilling the exercise of freedoms of those he serves Americans, including the NFL players,

“After the NFL first announced the new policy in May, Trump told Fox & Friends that players who don't stand during the anthem 'shouldn't be playing' and maybe 'shouldn't be in the country.’” Id.

The President's words chilled the NFL Players speech, and possibly other Americans to under the threat of economic persecution.

The lower Federal Courts recognize economic persecution as a form of government persecution.¹

On May 24, 2018, The President tweeted, ““You have to stand proudly for the National Anthem. You shouldn't be playing, you shouldn't be there.

Maybe they shouldn't be in the country...the NFL owners did the right thing" Id.

On Oct. 18, 2017, the President Trump tweeted, "The NFL has decided that it will not force players to stand for the playing of our National Anthem. Total disrespect for our great country!"⁴

"President Donald Trump praised an NFL policy banning kneeling during the 'The Star-Spangled Banner,' saying that 'maybe you shouldn't be in the country' if you don't stand for the anthem"⁵

In all of this, Donald J. Trump has violated the First Amendment freedom of speech against government persecution by willfully and knowingly persecuting those who exercised their freedom, Donald J. Trump.

In all of this, the President knowingly and willfully spoke and acted in a manner that violated the criminal law Title 18 of the United States Annotated Section 227.

In so doing he has undermined the integrity of his office, by violating federal criminal law and the freedoms under the Constitution, and brought disrepute on the Presidency, and betrayed his trust as President in a manner subversive of constitutional government, to the great prejudice of the cause of law and justice and to the manifest injury of the people of the United States.

Wherefore Donald J. Trump, by such conduct, warrants impeachment and trial, and removal from office ~~wherefore Donald J. Trump, by such conduct, warrants impeachment and trial, and removal from office.~~

⁴ The cases are limited to immigration cases, but the criminal statute Title 18 of the United States Code Annotated Section 227 extends government persecution by the President of the United States to economic persecution too. I applaud this branch of government for choosing to create a check on themselves and another branch of government.

⁵ Citing, Associated Press, Trump suggests NFL players who kneel shouldn't be in US, By May 24, 2018, <http://www.msn.com/en-us/sports/nfl/trump-lauds-nfl-policy-banning-kneeling-for-national-anthem/ar-AAxJHSz>).

**PREVENT WORLD
WAR 3
ARTICLE OF
IMPEACHMENT
MEG DRAFT A
COMPLETE DRAFT**

Begin forwarded message:

From: Meghan Kelly <electmegkelly@icloud.com>
Date: 1/28/2020
To: us@iusticedemocrats.com
Subject: Fwd: Impeachment articles and related docs by Meg Kelly

Please help!

Sent from my iPhone

Begin forwarded message:

From: Meghan Kelly <electmegkelly@icloud.com>
Date: January 5, 2020 at 8:15:50 PM EST
To: Meghan Kelly <electmegkelly@icloud.com>
Cc: League of Women Voters of De Of Women Voters Of Delaware <lwvde@comcast.net>, darin.mccann@coastalpoint.com, Jane Hovington <jehovahrohi@aol.com>, Glenn Rolphe <grolfe@newszap.com>, president@duq.edu, mbraden@bakerlaw.com, McKayla Braden <mckayla.braden@gmail.com>, wchandler@wsgr.com, Stacie.burton@yahoo.com, house.jdems@mail.house.gov, mckayla.braden@gmail.com, arlet.adrahamian@mail.house.gov, michael.pender@mail.house.gov, tyrone.hankerson@mail.house.gov, janice.bashford@mail.house.gov, zoe.orrick@mail.house.gov, zoe.orrick@mail.house.gov, carrick.heifferty@mail.house.gov, lieu.staff@mail.house.gov, andrea.anaya@mail.house.gov, sophie.bodlovich@mail.house.gov, brittan.robinson@mail.house.gov, alysa.buckler@mail.house.gov, brian.garcia2@mail.house.gov, Joe Neguse <emma.salas@mail.house.gov>, matthewkosiorek@comcast.net, Lucy Mcbeth <matthew.golden@mail.house.gov>, anneliese.israel@mail.house.gov, Veronica Escobar <jaqueline.sanchez@mail.house.gov>, Doug Collins <sebastian.wigley@mail.house.gov>, steve.chabot@mail.house.gov, caralee.conklin@mail.house.gov, ohi0ima@mail.house.gov, brittany.yanick@mail.house.gov, caleb.culver@mail.house.gov, luke.mcknight@mail.house.gov, dawn.mcarble@mail.house.gov, hayden.hayes@mail.house.gov, kate.laborde@mail.house.gov, steve.koncar@house.mail.gov, john.zwaanstra@mail.house.gov, kyle.rush@mail.house.gov, rep.bendline@mail.house.gov, reginald.darby@mail.house.gov
Subject: Re: Impeachment articles and related docs by Meg Kelly

Good evening,

Attached, I started drafting another set of articles, but I am making you finish it.

I am disappointed in all of you for placing your interest above your duties, by focusing on your seats instead of serving the country. You must impeach on a second article and

impeach again, as needed. Combat lawlessness with the rule of law. Do not exploit it to serve yourselves.

Also attached, please find a couple of articles relating to war crimes. Get your shit together and serve your country. You have the power to prevent global war. You have the power to reflect humility and respect for the lives and property and intrinsic value of other human beings. This humility and act of peace can reconcile relations and prevent bloodshed.

Do not play games with our brave troops' lives to serve your own vanity. Shame on Trump and shame on you if you fail to act swiftly. Perfection NOT required. True leadership is.

Serve your country, not your seat. Impeach.

I expect no less.

Good night.
Meg Kelly, Esq.

cutting and pasting in case you choose not to open it.

116 TH CONGRESS

1ST SESSION

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_____, 2019
_____ submitted the following resolution; which was referred to the

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ARTICLE I

THE PRESIDENT'S VIOLATION OF OATH OF OFFICE, PERJURY BY FAILING TO UPHOLD THE CONSTITUTION, AND LAWS OF THE LAND, INCLUDING THE ARTICLE II WARS POWERS ACT OF 1973

In his conduct while President of the United States, Donald J. Trump (herein also referred to as "President" or "Trump"), in violation of his constitutional oath to faithfully execute the office of President of the United States and, to the best of his ability, preserve, protect, defend and obey the Constitution of the United States, as well as his constitutional obligation to preserve, protect, defend and obey the laws of the land:

The President swore an oath to uphold the Constitutional laws, Federal laws, and international agreements.

The President has a duty to review, inform himself of such laws, in order to uphold the Constitution,

The President's ignorance is not innocence.

Ignoring the laws is not a defense in the President's violation of his oath of office to uphold the same.

No one is above the law. No one is below the law.

Not even the President of the United States is free to violate the law.

The President committed perjury by violating his oath to uphold the Constitution and Laws of the land by encouraging violation of the same under his policies at the border.

18 U.S.C.A. § 1621 provides:

"Whoever--

(1) having taken an oath before a competent tribunal, officer, or person, in any case in which a law of the United States authorizes an oath to be administered, that he will testify, declare, depose, or certify truly, or that any written testimony, declaration, deposition, or certificate by him subscribed, is true, willfully and contrary to such oath states or subscribes any material matter which he does not believe to be true; or

(2) in any declaration, certificate, verification, or statement under penalty of perjury as permitted under section 1746 of title 28, United States Code, willfully subscribes as true any material matter which he does not believe to be true; is guilty of perjury and shall, except as otherwise expressly provided by law, be fined under this title or imprisoned not more than five years, or both. This section is applicable whether the statement or subscription is made within or without the United States."

The President, through his policies relating to the strike that killed General Soleiman violated, Federal Law and/or International treaties and Law.

ARTICLE II WARS POWERS ACT OF 1973

~~On or about January __, 2019, President trump ordered~~

~~The President failed to give Congress notice within 48 hours of the strike~~

A "Requirement of War Powers Resolution that President report to Congress within 48 hours if United States armed forces have been introduced into hostilities or imminent hostilities and that, 60 days after report is submitted or required to be submitted, President shall terminate use of armed forces unless Congress declares war or enacts specific authorization for use of armed forces or extends 60-day period for an additional 30 days does not contemplate court-ordered withdrawal when no report is filed, but rather, leaves open possibility for court to order that report be filed or, alternatively, withdrawal 60 days after report was filed or required to be filed by court or Congress." Citing, *Crockett v. Reagan*, 558 F. Supp. 893 (D.D.C. 1982), *aff'd*, 720 F.2d 1355 (D.C. Cir. 1983), War Powers Resolution, §§ 2-9, 50 U.S.C.A. §§ 1541-1548; U.S.C.A. Const. Art. 1, § 8, cl. 11.

ARTICLE II WARS POWERS ACT OF 1973

**ARTICLE III VIOLATION OF INTERNATIONAL LAW
BY WAR CRIMES**

The Strike destroyed

In all of this, Donald J. Trump has undermined the integrity of his office, by violating federal and international criminal law and the Constitution, and brought disrepute on the Presidency, and betrayed his trust as President in a manner subversive of constitutional government, to the great prejudice of the cause of law and justice and to the manifest injury of the people of the United States.

Wherefore Donald J. Trump, by such conduct, warrants impeachment and trial, and removal from office.

On January 5, 2020 at 1:00 PM, Meghan Kelly <electmegkelly@icloud.com> wrote:

Hi folks,
I sent you 4 separate articles of impeachment to swiftly impeach on while the senate tries the first articles.

Please prevent world war 3 and draft another set now to protect our troops from dying for trump's vanity.
Impeach on a new set on the following articles

1. Perjury not upholding his oath
2. Unauthorized use of force
3. International war crimes

Perfection not required. Swift leadership is. Do not be misled by hacked likes, false mob rule. Lead, do not be misled. Serve your country not yourself by focusing on seats.

Save our troops lives before it is too late and they kill and die for Trump's mere fancies.

God help us help them.

Good day.
Meg

Sent from my iPhone

On Aug 7, 2019, at 6:03 PM, Meghan Kelly <electmegkelly@icloud.com> wrote:

Attached, and below, please find an email list of the contact for each of the 41 Reps on the judiciary committee considering impeachment who provided an email contact.

You may be able to contact the members by their contact info on the web site at this link below too

Please work together united as Americans to serve your country.
<https://judiciary.house.gov/about/members>

Please feel free to give me a call on my cell regardless of your support at 302-727-2079. Thank you. Have a great night.

1. Chair, Hon Rep. Nadler. house_idems@mail.house.gov Char
2. [REDACTED] Rep Mary Gay Scanlan. (Please forward message to her for consideration)
3. Rep. Zoe Lofren arlet.adrahamian@mail.house.gov
4. Rep. Sheila Jackson Lee michael.pender@mail.house.gov
5. [REDACTED] Rep. Steve Cohen (Please forward message to him for consideration)
6. Rep. Henry C. Johnson tyrone.hankerson@mail.house.gov
7. [REDACTED] Rep Ted. Deutch (Please forward message to him for consideration)
8. Rep. Karen Bass. janice.bashford@mail.house.gov
9. [REDACTED] Rep Cedric Richmond (Please forward message to him for consideration)
10. Rep. Hakeem S. Jaffries zoe.orick@mail.house.gov
11. [REDACTED] Rep Eric Swalwell (Please forward message to him for consideration)
12. Rep. David N Ciciline Carrick.heilferty@mail.house.gov
13. Rep. Red Lieu lieu.staff@mail.house.gov Sophie is the contact
14. Hon Rep Jamie Raskin andrea.anaya@mail.house.gov
15. Hon Rep. Pramila Jayapal sophe.bodlovich@mail.house.gov
16. Hon Rep. Val Butler brittan.robinson@mail.house.gov
17. Hon J. Luis alysa.buckler@mail.house.gov
18. Rep. Sylvia brian.garcia2@mail.house.gov
19. Joe Neguse emma.salas@mail.house.gov
20. Lucy Mcbeth matthew.golden@mail.house.gov
21. Greg Stanton laura.munozlopez@mail.house.gov
22. Rep Madeliene Dean anneliese.israel@mail.house.gov
23. Debbie Mucarsel Jessica.valdes@mail.house.gov
24. Veronica Escobar Jaqueline.sanches@mail.house.gov
25. Doug Collins Sebastian.wigley@mail.house.gov
26. [REDACTED] Rep Sensebrenner
27. Rep. Steve Chabot Steve.chabot@mail.house.gov
28. Rep. Louie Gohmert caralee.conkline@mail
29. Rep. Jim Jordan ohiOima@mail.house.gov
30. Rep Ken Buck brittany.vanick@mail.house.gov
31. Rep John Ratcliffe caleb.culver@mail.house.gov
32. Rep. Martha Roby luke.mcknight@mail.house.gov

- 33. Rep Matt Gaetz dawn.mcarble@mail.house.gov
- 34. Rep Mike Johnson hayden.haves@mail.house.gov
- 35. Rep Andy Biggs kate.laborde@mail.house.gov
- 36. Rep Tom McClintock steve.koncar@mail.house.gov
- 37. Rep Debbie Lesko john.zwaanstra@mail.house.gov
- 38. Rep. Guy Reschenthale kyle.rush@mail.house.gov
- 39. Rep. Ben Cline rep.bencline@mail.house.gov
- 40. 40. [REDACTED] [Rep: Kelly Armstrong Please forward message to him for consideration](#)

Rep Greg Stuebe reginald.darby@mail.house.gov

On August 7, 2019 at 2:52 PM, Meghan Kelly <electmegkelly@icloud.com> wrote:

Good afternoon,

This is Meg Kelly, Esq., an attorney from Delaware.

I am resending the three articles of impeachment, and related documents, I emailed yesterday to 34 of the 41 members on the House judiciary committee since not all members received it.

In addition, attached, please find additional documents relating to kidnapping, false imprisonment and perjury, excluded on the email I sent yesterday.

Per my teleconference:

Game plan:

Impeach on 5 (five) separate articles of impeachment presented separately to protect

1. Freedom of speech, the NFL article of impeachment relating to the attached criminal law, 18 USC section 227
2. Freedom of the press under criminal law, 18 USC section 227
3. Due process violations at the border. While the Supreme Court allows detention during deportation hearings, the conditions at the border are so heinous that they should be considered punishment without procedural due process under the 5th amendment. Argue substantive due process if you want. The border policies of the President also violate the crimes of kidnapping under 28 USCA section 1201 and false imprisonment under federal common law.

4 obstruction of justice. Please continue your work on this

5 porn star impeachment no further investigations needed.

Porn star impeachment crimes

26 USCA 7206

26 USCA 7202

26 USCA 7201

26 USCA 7207

No investigations needed the porn star payoffs and two checks from improper accounts are enough circumstantial evidence to deem the president guilty of these crimes without further records. You can pull the records, but he delays strategically. His sister was a Federal Judge in my circuit, the third circuit. The President knows what he is doing. In addition, the President has much experience with law suits. I looked up 1000 plus cases related to Trump at the law library. He may the law better than an attorney with all his court experience. (had to laugh, better than crying)

The records are not necessary.

You *win* by doing the right thing, upholding the laws that grant us the freedoms we all hold dear. Without them we are not free.

Stand united together as Americans to serve your country not your seat. Impeach.

Lawlessness must be combated with the impartial rule of law via impeachment, not exploited to win elections at the country's expense.

Please act swiftly.

Perfection not required.

Leadership is required.

Different times require different measures. The 400 failed attempt to impeach Clinton will not work against President Trump.

Please serve your country. Do not exploit the President's lawlessness to serve election seats at the expense of the country. We have everything to lose, especially since elections will likely be hacked.

Thank you♥

Please feel free to call me on my cell if you have any questions.

Have a good night.

Thank you and best regards,

Meg Kelly, Esq.

Licensed DE, DC, PA, US Supreme Court

34012 Shawnee Drive

Dagsboro, DE 19939

(302)727-2079

Begin forwarded message:

From: Meghan Kelly <electmegkelly@icloud.com>

Date: 8/7/2019

To: Meghan Kelly <electmegkelly@icloud.com>

Subject: Impeachment articles and related docs by Meg Kelly

**SAVE THE PRESS
ARTICLE OF
IMPEACHMENT**

§ 227. Wrongfully influencing a private entity's employment..., 18 USCA § 227

United States Code Annotated

Title 18. Crimes and Criminal Procedure (Refs & Annos)

Part I. Crimes (Refs & Annos)

Chapter 11. Bribery, Graft, and Conflicts of Interest (Refs & Annos)

18 U.S.C.A. § 227

§ 227. Wrongfully influencing a private entity's employment decisions by a Member of Congress or an officer or employee of the legislative or executive branch

Effective: April 4, 2012

Currentness

(a) Whoever, being a covered government person, with the intent to influence, solely on the basis of partisan political affiliation, an employment decision or employment practice of any private entity--

(1) takes or withholds, or offers or threatens to take or withhold, an official act, or

(2) influences, or offers or threatens to influence, the official act of another,

shall be fined under this title or imprisoned for not more than 15 years, or both; and may be disqualified from holding any office of honor, trust, or profit under the United States.

(b) In this section, the term "covered government person" means--

(1) a Senator or Representative in, or a Delegate or Resident Commissioner to, the Congress;

(2) an employee of either House of Congress; or

(3) the President, Vice President, an employee of the United States Postal Service or the Postal Regulatory Commission, or any other executive branch employee (as such term is defined under section 2105 of title 5, United States Code).

CREDIT(S)

116 TH CONGRESS

1ST SESSION

Impeaching Donald J. Trump, President of the United States, of high crimes and misdemeanors.

_____, 2019
submitted the following resolution; which was referred
to the _____

Impeaching Donald J. Trump, President of the United
States, of high crimes and misdemeanors.

RESOLUTION

Resolved, That Donald J. Trump,

President of the United States, is impeached for high crimes and misdemeanors, and that the following Articles of Impeachment to be exhibited to the Senate:

Articles of Impeachment to be exhibited by the House of Representatives of the United States of America in the name of itself and all of the people of the United States of America, against Donald J. Trump, President of the United States, in maintenance and support of its impeachment against him for high crimes and misdemeanors.

ARTICLE I

THE PRESIDENT'S VIOLATION OF CRIMINAL LAW PURSUANT
TO TITLE 18 OF THE UNITED STATES CODE, SECTION 227

In his conduct while President of the United States, Donald J. Trump (herein also referred to as "President" or "Trump"), in violation of his constitutional oath to faithfully execute the office of President of the United States and, to the best of his ability, preserve, protect, defend and obey the Constitution of the United States, as well as his constitutional

obligation to preserve, protect, defend and obey the laws of the land, including the Federal Criminal Statute 18 U.S.C.A. § 227.

No one is above the law. No one is below the law.

Not even the President of the United States is free to willfully violate criminal laws without Constitutional justification.

The President by his words and/or deeds violated the criminal law Title 18 of the United States Code, Section 227.

Pursuant to 18 U.S.C.A. § 227,

"(a) Whoever, being a covered government person, with the intent to influence, solely on the basis of partisan political affiliation, an employment decision or employment practice of any private entity--

(1) takes or withholds, or offers or threatens to take or withhold, an official act, or

(2) influences, or offers or threatens to influence, the official act of another,

shall be fined under this title or imprisoned for not more than 15 years, or both, and may be disqualified from holding any office of honor, trust, or profit under the United States.

(b) In this section, the term "covered government person" means--

(1) a Senator or Representative in, or a Delegate or Resident Commissioner to, the Congress;

(2) an employee of either House of Congress; or

(3) the President, Vice President, an employee of the United States Postal Service or the Postal Regulatory Commission, or any other executive branch employee (as such term is defined under section 2105 of title 5, United States Code)."

The President is specifically listed as a "covered government person" under this criminal law under 18 U.S.C.A. § 227(a), (b)(3).

The President withheld an "official act" to faithfully defend and protect the Press's Constitutional freedom of the press from government persecution, as required under this statute.

The President not only "withheld an official act" to defend, protect and

obey the United States Constitution by failing to defend the Press's protected first amendment freedom, he also violated the Press's freedom from government persecution by actively persecuting, ridiculing and, or encouraging the ridicule and boycott of certain news sources, and or outlets based solely on the news reporter's and/or station or paper's (herein also referred to as the "Press," above and below, collectively or individually) perceived, projected or manufactured political affiliation against Trump and/or Trump's base or alleged American political values. Citing, 18 U.S.C.A. § 227(a)(1).

The President's withholding of such official act and active violation of the same was made with "the intent to influence," solely on the basis of the perceived or projected partisan political affiliation of news reporter(s) and/or station(s) or paper(s), "an employment decision or employment practice of private" entities, news outlet(s) (also referred herein as the "news"). Citing, 18 U.S.C.A. § 227 (a).

The President also, "influence(d), or offer(ed) or threaten(ed) to influence, the official acts of," others in his staff, government agents, troops, service men and women, and congressmen and congresswomen, as well as all Americans, when he encouraged others to persecute, ridicule, demean, and/or boycott the Press for exercising their freedom of the press. Citing, 18 U.S.C.A. § 227 (a)(2).

The President's encouragement was made with "the intent to influence, solely on the basis of the perceived, or projected partisan political affiliation, against President Trump and/or his supporters and/or American values, an employment decision or employment practice of" private entities, the news outlets. Citing, 18 U.S.C.A. § 227 (a).

Trump persuading some Americans to boycott the news based on his comments, including, but not limited comments to, such as "fake news" about the Press.

Trump gained support by those who chose to remain uninformed concerning the news.

Trump offered an excuse some Americans adopted for their decision not to be concerned with the world beyond their own community.

Trump eliminated the guilt of people who chose not to inform themselves by the news.

Trump encouraged ignorance, ignoring news concerning others, and

indifference, an atmosphere of unconcern for people outside of our own.

With the busyness of life, it took away the guilt of many citizens for their decision to remain uninformed.

Trump offered an excuse to feel smart for not watching, reading or listening to the news.

In fact, part of American society began to say those who watched the news and read the papers were foolish or not smart.

Throughout the nation, we have seen an unusual trend of people repeating the President's comment, "fake news."

This trend caused droppings in ratings and ending of subscriptions of the Press based on the President's comments.

This "fake news" trend has helped Trump gain support by those who reject or refuse to listen, read or watch certain news.

Trump wants to win.

Trump recognizes he gains more support by attacking sources part of his base refuse to watch, read or listen to.

Trump's comments were made solely on the "basis of partisan political affiliation" attributed to the Press for exercising their Constitutional freedom of the Press.

The President also intended "to cause an employment decision or employment practice of (a) private entity" by his persecution of the Press

1. to garner more favorable news from the Press,
2. and/or to prevent/chill the news from reporting on certain disfavorable news concerning himself, his policies and information relating to evidence and facts concerning political views, (chilling the Press's freedom of the Press and freedom of speech),
3. and or to diminish the reputation of the news to force them to state information in a light more favorable towards the President.

The President desires more favorable news by the Press to help him win.

The President claims he likes winning.

Winning is not most important. Doing the right thing is more important

than winning.

Violating the rules of law to win is not winning. It is cheating and destroying the laws that safeguard our freedoms that make our country already great.

America is a nation of laws, including Constitutional laws that uphold the freedom of the American citizens against persecution by the government, for lawfully exercising their freedoms.

Lawlessness is the problem. Lawlessness is not the solution. The impartial and fair administration of the rule of law is the solution.

The President's speech persecuting the Press is not protected speech.

The Press is Constitutionally protected.

The Press's freedom of speech is also Constitutionally protected.

President Trump's speech persecuting, threatening and ridiculing the Press for exercising their freedom of the Press and freedom of speech (herein referred to as "speech") is not Constitutionally protected speech.

Trump's speech is lawless violating both Constitutional law and Criminal law.

President Trump disobeyed the Constitution by persecuting, instead of protecting the Press, in order to garner and/or keep political support for the President.

The President violated the criminal law 18 USCA section 227 and the Constitutional laws safeguarding the freedom of the Press, as described herein, in an attempt to "keep winning."¹

President Trump's behavior was based solely on serving himself by attributing to the Press a partisan political affiliation against America, against Trump and/or against Trump's base.

The President's violations of the first Amendment freedom of the Press created unsafe conditions for members of the Press.

The President did not display any concern about the safety of the Press or the foreseeable violent persecution against them based on some supporters' loyalty towards the President.

¹ CBS News clip found at (<https://www.youtube.com/watch?v=0154UPdNdhE>) (Published, Jun 20, 2018).

The President's persecution, ridicule, demeaning and disparaging of the Press has led some supporters of the President to foreseeably, violently persecute and attempt to kill members of the Press in the United States of America, in an apparent defense of the President.

The President's persecution has led some Americans through his mis-leadership, to persecute the Press by words and deeds, exacerbating the chilling effect, and the mass threat of persecution to members of the Press by words or deeds.

In February 2019, Journalist Andrew Resticcia's article pointed out, "(m)ore than 24 hours after news broke that a Coast Guard officer — an avowed white nationalist — was allegedly plotting to kill Democratic politicians and journalists, Trump has, at least so far, not said a word."²

"'It's irresponsible and dangerous,' said Alexandra Ellerbeck, the North America program coordinator at the Committee to Protect Journalists. 'When we talk to journalists, they feel less safe than they used to.'" Id.

"Scarborough and others have noted that news of the alleged plot to kill Democratic politicians and journalists broke just hours after New York Times publisher A.G. Sulzberger chastised Trump for calling the Times the "enemy of the American people" after it published an account of the president's efforts to undercut the investigations encircling him." Id.

"'The phrase 'enemy of the people' is not just false, it's dangerous. It has an ugly history of being wielded by dictators and tyrants who sought to control public information. And it is particularly reckless coming from someone whose office gives him broad powers to fight or imprison the nation's enemies,' Sulzberger wrote. 'As I have repeatedly told President Trump face to face, there are mounting signs that this incendiary rhetoric is encouraging threats and violence against journalists at home and abroad.'" Id.

"Since 2016, Acosta has become one of the press corps' most high-profile (Press) members, regularly sparring with administration officials, such as Sanders and White House senior policy adviser Stephen Miller. For Trump — who repeatedly vents his anger at the press and CNN in particular — Acosta is a convenient foil. But the reporter's bulldog

² Politico, Trump stays silent on media-hating Coast Guard office, By Andrew Resticcia, dated February, 21, 2019, <https://www.politico.com/story/2019/02/21/trump-coast-guard-officer-1179749>. Also see, The Hill, Trump declares New York Times 'enemy of the people', By Brett Samuels, February 20, 2019.

reporting style has made him a household name.”³

The White House suspended Mr. Acosta’s Press credentials. Id.

Mr. Acosta said, “I probably receive more death threats than I can count, ... ‘I get them basically once a week.’” Id.

The First Amendment freedom of the Press against government persecution protects the Press from speech by the President, and those who work or serve under the cloak of government authority, from government persecution for their exercise of their first Amendment freedoms.

Government persecution, persecution by the President, mis-leads some Americans as a command to obey and persecute those the President persecutes too.

The President has more limited freedoms in exchange for his position of government authority. He may not misuse his authority by violating the Constitution to voice his opposition and active persecution to any American who thinks differently.

The President is creating a threat of physical danger to the Press.

He has failed to safeguard, uphold, and defend the Press, and their Constitutional freedom.

The President failed to speak up and defend and safeguard the Press when members were attacked and or killed.

A journalist “Khashoggi was murdered on October 2, 2018, sometime after he entered the Saudi consulate in Istanbul, Turkey. A kill squad of Saudi agents carried out the operation, cutting the journalists body into pieces with a bone saw. Saudi leaders initially denied knowing the whereabouts of Khashoggi, but after intense international backlash, finally admitted that he had been killed inside the diplomatic facility.”⁴

³ Washington Post, How CNN’s Jim Acosta became the reporter Trump loves to hate, By Kyle Swenson, Dated November 8, 2018, https://www.washingtonpost.com/nation/2018/11/08/how-cnns-jim-acosta-became-reporter-trump-loves-hate/?noredirect=on&utm_term=.ef2ec2711731

⁴ Newsweek, Trump Defends Saudi Arabia’s Murder of Journalist Jamal Khashoggi by Saying Iran Kills People Too, By Jason Lemon, Dated June 23, 2019, <https://www.newsweek.com/trump-defends-saudi-arabia-jamal-khashoggi-iran-kills-people-1445430>

Also see, New York Times, One Killing, Two Accounts: What We Know About Jamal Khashoggi’s Death, By Ben Hubbard, Oct. 20, 2018, <https://www.nytimes.com/2018/10/20/world/middleeast/khashoggi-turkey-saudi->

“(A) fter intelligence investigations strongly suggested that Saudi Arabia's Crown Prince Mohammed Bin Salman was likely behind the murder of Khashoggi, Trump insisted the kingdom was a ‘great ally.’ He also criticized Iran, saying the U.S. relied on the Saudis to counter the Persian Gulf nation, buy American weapons and keep oil prices low.” Id.

In June 28, 2018, a gunman shot and killed five journalists at a newspaper office in Annapolis Maryland, the Capitol. ⁵

The threat of violence as a means to force suppression, chill, the Press's publication of unfavorable content is real.

The President encourages such lawlessness by his words and deeds.

The President not only violated the Press's first Amendment freedom of the Press, he also violated their first Amendment freedom of speech.

The Press's first amendment freedoms of the Press and speech affords them protection from government persecution for exercising their first amendment right to speak negatively about government conduct.

Pursuant to the Supreme Court in McDonald v. Smith, 472 U.S. 479, 486–87, 105 S. Ct. 2787, 2791–92, Citing New York Times Co. v. Sullivan, 376 U.S. 254, 270, 84 S. Ct. 710, 721, 11 L. Ed. 2d 686 (1964),

“The first amendment specifically protects speech against government acts and decisions citizens may disagree with. As with the freedoms of speech and press, exercise of the right to petition “may well include vehement, caustic, and sometimes unpleasantly sharp attacks on government and public officials,” and the occasionally “erroneous statement is inevitable.” New York Times Co. v. Sullivan, supra, 376 U.S., at 270–271, 84 S.Ct., at 720–721. The First Amendment requires that we extend substantial “‘breathing space’ ” to such expression, because a rule imposing liability whenever a statement was accidentally or negligently incorrect would *487 intolerably chill “would-be critics of official conduct ... from voicing their criticism.” 376 U.S., at 272, 279, 84 S.Ct., at 721, 725.1”

narratives.html

⁵ Citing, NBC News, Capital Gazette shooting: Suspect charged after 5 killed at Maryland newspaper, By Phil Helsel, Tom Winter and Jonathan Dienst, June 28, 2018, Updated June 29, 2018

<https://www.nbcnews.com/news/us-news/multiple-people-reported-shot-maryland-newspaper-office-n887526>; BBC, Annapolis journalists killed in ‘targeted attack’ on Capital Gazette, June 29, 2018

29 June 2018, <https://www.bbc.com/news/world-us-canada-44645986>

When Trump accepted a position of government authority, under our Constitution, his Constitutional rights became more limited in order to uphold the Constitutional laws that protect the freedoms of those he serves, the American people.

The Constitution laws limit the power of government agents in order to safeguard the freedoms of those who reside in America from persecution under the cloak of government authority.

Trump, as president, may not unconstitutionally chill the Press's speech and their freedom of the Press based on perceived, projected or manufactured political affiliation derived from the Press's exercise of their first amendment freedoms.

The freedom of the Press gives the Press the freedom to voice their disagreement with government actions and ideas, including the right to criticize the President.

The United States Supreme Court held, "Criticism of (a government official) conduct does not lose its constitutional protection merely because it is effective criticism and hence diminishes their official reputations." *New York Times Co. v. Sullivan*, 376 U.S. 254, 272-73, 84 S. Ct. 710, 722, 11 L. Ed. 2d 686 (1964).

Trump is the President of the United States.

Trump represents through his deeds and words, the government in the executive branch.

The Government through Trump's deeds and words unconstitutionally persecuted the Press for exercising their first amendment freedom.

Trump violated his oath to uphold the Constitution by actively disobeying the Constitution by persecuting the Press for exercising their Constitutional freedom of the Press.

Arguably, the President committed perjury under 18 U.S.C.A. § 1621, for lying under oath to uphold the Constitution and laws by actively knowingly violating the same, and/or refusing to read them in order that he may uphold the same.

Trump intended to cause the threat of economic harm and/or social harm and/or physical harm to the Press and against members of the Press who participated in the exercise of their freedom of the speech and the Press.

Trump has called for the boycott of the Press for exercising their

freedom.

On June 3, 2019, "President Donald Trump, in a tweet Monday morning, encouraged customers of AT&T to boycott the company to force it to make editorial changes at the CNN news network, which it owns." ⁶

"The president wrote as he was preparing to meet Queen Elizabeth II at the start of a three-day state visit to the UK." Id.

"He said the only US news network he could find to watch after landing was CNN, which he found too negative in its coverage of the US." Id.

On June 3, 2019, the President tweeted, "'Just arrived in the United Kingdom, ""The only problem is that @CNN is the primary source of news available from the U.S. After watching it for a short while, I turned it off. All negative & so much Fake News, very bad for U.S. Big ratings drop. Why doesn't owner @ATT do something?" Id.

The President tweeted "I believe that if people sto(p)ed using or subscribing to @ATT, they would be forced to make big changes at @CNN, which is dying in the ratings anyway. It is so unfair with such bad, Fake News! Why wouldn't they act. When the World watches @CNN, it gets a false picture of USA. Sad!" Id.

On July 7, 2019 the President Tweeted, "Watching @FoxNews weekend anchors is worse than watching low ratings Fake News @CNN, or Lyin' Brian Williams (remember when he totally fabricated a War Story trying to make himself into a hero, & got fired. A very dishonest journalist!) and the crew of degenerate....." ⁷

On July 7, 2019 Trump said Fox "network 'forgot the people who got them there.' He griped Fox News was 'loading up with Democrats' and complained it was citing The New York Times as 'a 'source' of information,' an apparent reference to the newspaper's Sunday article about disease, hunger and overcrowding at a Texas center holding migrant children." Id.

On July 11, 2019, in an article by the Fox news network, LLC, called Trump rails against 'Fake News' in bizarre tirade, warns industry will fold

⁶ Citing, Business Insider, Trump tells people to boycott CNN parent AT&T to force more positive coverage of his administration, By Tim Porter, June 3, 2019, https://www.businessinsider.com/trump-encourages-att-boycott-over-cnn-coverage-2019-6?fbclid=IwAR2aerXjC1P2P9UOXBBfJZx1y4-c7Vju2_A3OJB2XAYbxuRXscJ1ExyMPo

⁷ Newsweek, TRUMP DEFENDS SAUDI ARABIA'S MURDER OF JOURNALIST JAMAL KHASHOGGI BY SAYING IRAN KILLS PEOPLE TOO, By James Lemon, dated June 23, 2019, <https://www.newsweek.com/trump-defends-saudi-arabia-jamal-khashoggi-iran-kills-people-1445430>

when he leaves office, by Brooke Sigmund states: “President Trump teed off on the news media in a bizarre Twitter rant Thursday morning ahead of a big social media summit at the White House slated for later in the day.”⁸

“The string of tweets attacked the news media and claimed the industry would go out of business when he leaves office, even suggesting outlets would be forced to endorse him this cycle for the sake of their own survival.” Id.

“He went on to alternately praise himself, lob insults at familiar targets in the 2020 Democratic field and even joke about serving more than two terms.” Id.

On January 11, 2017, in a news’s conference, President persecuted the Press, diminishing the confidence in their news by stating “this political witch hunt by some in the media is based on some of the most flimsy reporting and is frankly shameful and disgraceful.”⁹

On February 17, 2018, Trump tweeted “Funny how the Fake News Media doesn’t want to say that the Russian group was formed in 2014, long before my run for President. Maybe they knew I was going to run even though I didn’t know!”¹⁰

“Trump entered the election on June 16, 2015, after the Russian organization was formed — a fact that, contrary to Trump’s Twitter musings, was reported by many news organizations.” Id.

The President asserted facts that were not true. Id.

Yet, since he encourages Americans not to watch the news by calling it fake news, many believed Trump’s false, misleading and deceiving allegations as truth. Id.

⁸ Citing, Fox news network, LLC, Trump rails against ‘Fake News’ in bizarre tirade, warns industry will fold when he leaves office, By Brooke Sigmund, July 11, 2019, August 10, 2018, <https://www.foxnews.com/politics/trump-rails-against-fake-news-in-bizarre-tirade-warns-industry-will-fold-when-he-leaves-office?fbclid=IwAR3um59LQ4S2GxajidPEPoSUdiI099OYEhjGVsUu3T1jdb7lq4rtysQj7oY>

⁹ New York Times, Donald Trump’s News Conference: Full Transcript and Video, January 11, 2017, <https://www.nytimes.com/2017/01/11/us/politics/trump-press-conference-transcript.html>

¹⁰ Citing, USA Today, Trump scolds ‘Fake News Media’ over reporting of Russian meddling in 2016 election, By Michael Collins, February 17, 2018.

<https://www.usatoday.com/story/news/politics/onpolitics/2018/02/17/trump-scolds-fake-news-media-over-reporting-russian-meddling-2016-election/348356002/>

On April 1, 2017, April Fool's Day "Mr. Trump fired off two tweets Saturday, first asking when Todd, (a specific newsman) and NBC will stop covering any Russian government ties to the White House, then vilifying NBC as the same network that perpetuated the theory he had "no path to victory" before the election. Mr. Trump dubbed NBC's coverage a 'total scam.' Todd discussed Russia Friday on NBC's 'Nightly News.'" ¹¹

The President tweeted, "It is the same Fake News Media that said there is "no path to victory for Trump" that is now pushing the phony Russia story. A total scam!" Id.

Trump compromised the Press's integrity by claiming the Press would reward the fruits of unlawful during a news conference in July 2016 when he stated. ¹²

"Russia, if you're listening, I hope you're able to find the 30,000 emails that are missing," with regards to Mrs. Clinton's deleted emails. "I think you will probably be rewarded mightily by our press." Id.

On-May 4, 2017, Trump tweeted "The Fake News media is officially out of control. They will do or say anything in order to get attention - never been a time like this!" ¹³

On January 11, 2017 Trump tweeted, "I win an election easily, a great "movement" is verified, and crooked opponents try to belittle our victory with FAKE NEWS. A sorry state!" Id.

¹¹ Citing, CBS News, Trump calls "Fake Trump/Russia story" a "total scam" as investigations ramp up, By Kathryn Watson, Dated April 1, 2017,

<https://www.cbsnews.com/news/trump-calls-fake-trump-russia-story-a-total-scam-as-investigations-ramp-up/>

¹² Citing, New York Times, Donald Trump Calls on Russia to Find Hillary Clinton's Missing Emails, July 27, 2016

<https://www.nytimes.com/2016/07/28/us/politics/donald-trump-russia-clinton-emails.html>

¹³ Citing, Axios, Everything Trump has called "FAKE NEWS", By Haley Britzky, Jul 9, 2017, <https://www.axios.com/everything-trump-has-called-fake-news-1513303959-6603329e-46b5-44ea-b6be-70d0b3bdb0ca.html>, Citing, President Donald Trump's twitter account (This article contains direct links to President Trump's twitter account.)

"FAKE NEWS media, which makes up stories and "sources," is far more effective than the discredited Democrats - but they are fading fast!"

On Jan 11, 2017 Trump tweeted, "We had a great News Conference at Trump Tower today. A couple of FAKE NEWS organizations were there but the people truly get what's going on" Id.

On January 13, 2017, Trump tweeted, "Totally made up facts by sleazebag political operatives, both Democrats and Republicans - FAKE NEWS! Russia says nothing exists. Probably..." Id.

On February 16, 2017, Trump tweeted, " FAKE NEWS media, which makes up stories and "sources," is far more effective than the discredited Democrats - but they are fading fast!" Id.

On February 24, 2017 Trump tweeted, " FAKE NEWS media knowingly doesn't tell the truth. A great danger to our country. The failing @nytimes has become a joke. Likewise @CNN. Sad!" Id.

On June 6, 2017 Trump tweeted, "Sorry folks, but if I would have relied on the Fake News of CNN, NBC, ABC, CBS, washpost or nytimes, I would have had ZERO chance winning WH" Id.

January 12, 2017, Trump tweeted, ".@CNN is in a total meltdown with their FAKE NEWS because their ratings are tanking since election and their credibility will soon be gone!" Id.

On June 27, 2017, Trump tweeted, "Fake News CNN is looking at big management changes now that they got caught falsely pushing their phony Russian stories. Ratings way down!" Id.

On June 28, 2017, Trump tweeted, "The failing @nytimes writes false story after false story about me. They don't even call to verify the facts of a story. A Fake News Joke!" Id.

On June 28, 2017, Trump tweeted, "The #AmazonWashingtonPost, sometimes referred to as the guardian of Amazon not paying internet taxes (which they should) is FAKE NEWS!" Id.

On June 30, 2017, Trump tweeted, "Watched low rated @Morning_Joe for first time in long time. FAKE NEWS. He called me to stop a National Enquirer article. I said no! Bad show." Id.

In all of this the President undermined the integrity of the Press as an integral part of a free society.

The Freedom of the Press and the Freedom of speech makes America more free. The dissemination of information allows people to see different views, ideas and perspectives instead of the narrow view of the few with money, power and connections who, if allowed, would buy our eyes and ears to

profit off of our ignorance.

The freedom of the Press, and speech must be safeguarded from persecution at the behest of those with power.

The common man is made equal under the law by the laws safeguarding the freedom of the Press and speech. That is quite beautiful. The powerful must give up power. The lowly have laws that lift them higher by granting them more power than those in positions of authority. The common man is somehow more equal with the powerful by the Constitutional laws safeguarding the freedom of the Press and speech.

That humility and respect for the dignity of other people regardless of their station in life mandated by our Constitution is worth fighting against those few with evil, self serving, greedy, gluttonous interests. Those loveless creatures who seek to enslave and to be served as opposed to serve are rooted out by the Constitutional laws that make this country already great.

Trump made America less great by chilling the exercise of freedoms of those he serves Americans, including the members of the Press.

The President's words chilled the freedom of the Press and/or speech, and possibly other Americans' freedoms under the threat of economic persecution.

The lower Federal Courts recognize economic persecution as a form of government persecution.¹⁴

In all of this, Donald J. Trump has violated the First Amendment freedom of the Press against government persecution by willfully and knowingly persecuting those who exercised their freedom, Donald J. Trump.

In all of this, the President knowingly and willfully spoke and acted in a manner that violated the criminal law Title 18 of the United States Annotated Section 227.

In so doing he has undermined the integrity of his office, by violating federal criminal law and the freedoms under the Constitution, and brought disrepute on the Presidency, and betrayed his trust as President in a manner subversive of constitutional government, to the great prejudice of the cause of law and justice and to the manifest injury of the people of the United States.

¹⁴ The cases are limited to immigration cases, but the criminal statute Title 18 of the United States Code Annotated Section 227 extends government persecution by the President of the United States to economic persecution too. I applaud this branch of government for choosing to create a check on themselves and another branch of government.

Wherefore Donald J. Trump, by such conduct, warrants impeachment and trial, and removal from office.

**SAVE DUE
PROCESS
AND PREVENT
KIDNAPPING
BABIES AT THE
BORDER
ARTICLE OF
IMPEACHMENT**

116 TH CONGRESS
1ST SESSION

Impeaching Donald J. Trump, President of the United States, of high crimes and misdemeanors.

_____, 2019
submitted the following resolution; which was referred to the _____

Impeaching Donald J. Trump, President of the United States, of high crimes and misdemeanors.

RESOLUTION

Resolved, That Donald J. Trump,

President of the United States, is impeached for high crimes and misdemeanors, and that the following Articles of Impeachment to be exhibited to the Senate:

Articles of Impeachment to be exhibited by the House of Representatives of the United States of America in the name of itself and all of the people of the United States of America, against Donald J. Trump, President of the United States, in maintenance and support of its impeachment against him for high crimes and misdemeanors.

ARTICLE I

THE PRESIDENT'S VIOLATION OF OATH OF OFFICE, PERJURY BY FAILING TO UPHOLD THE CONSTITUTION, AND LAWS OF THE LAND, INCLUDING THE 5TH AMENDMENT DUE PROCESS CLAUSE

In his conduct while President of the United States, Donald J. Trump (herein also referred to as "President" or "Trump"), in violation of his constitutional oath to faithfully execute the office of President of the

Add the benefit charged for the prisoners please 250 2017
Use Gov. doc as Exhibit to Art. I. No hearing exception BABY.

United States and, to the best of his ability, preserve, protect, defend and obey the Constitution of the United States, as well as his constitutional obligation to preserve, protect, defend and obey the laws of the land:

The President swore an oath to uphold the Constitutional laws.

The President has a duty to review, inform himself of such Constitutional laws, in order to uphold the Constitution,

The President's ignorance is not innocence.

Ignoring the Constitutional laws is not a defense in the President's violation of his oath of office to uphold the same.

No one is above the law. No one is below the law.

Not even the President of the United States is free to willfully violate the Constitution.

The President committed perjury by violating his oath to uphold the Constitution and Laws of the land by encouraging violation of the same under his policies at the border.

18 U.S.C.A. § 1621 provides:

"Whoever—

(1) having taken an oath before a competent tribunal, officer, or person, in any case in which a law of the United States authorizes an oath to be administered, that he will testify, declare, depose, or certify truly, or that any written testimony, declaration, deposition, or certificate by him subscribed, is true, willfully and contrary to such oath states or subscribes any material matter which he does not believe to be true; or

(2) in any declaration, certificate, verification, or statement under penalty of perjury as permitted under section 1746 of title 28, United States Code, willfully subscribes as true any material matter which he does not believe to be true; is guilty of perjury and shall, except as otherwise expressly provided by law, be fined under this title or imprisoned not more than five years, or both. This section is applicable whether the statement or subscription is made within or without the United States."

The President, through his policies at the Border, has encouraged the punishment of people in this country in violation of the 5th

Keep

Remove

being evidence.

Amendment due process of law, in total disregard of his oath to uphold the Constitution, including the 5th Amendment.

The US Supreme Court held: "Fifth Amendment entitles aliens to due process of law in deportation proceedings, and detention during such proceedings is constitutionally valid aspect of deportation process." U.S.C.A. Const. Amend. 5th Demore v. Kim, 538 U.S. 510, 123 S. Ct. 1708, 155 L. Ed. 2d 724 (2003).¹

While detention is permitted at detention centers, the conditions at detention centers are so heinous must be considered punishment, not mere detention, without a hearing or trial, in deprivation of the detainees' substantive due process "right to bodily integrity," Citing, Albright v. Oliver, 510 U.S. 266, 114 S. Ct. 807, 127 L. Ed.

"Since pretrial detainees ... are similarly restricted in their ability to fend for themselves, (the Government) owes a duty to both groups that effectively confers upon them a set of constitutional rights that fall under court's rubric of "basic human needs." Hare v. City of Corinth, Miss., 74 F.3d 633 (5th Cir. 1996).

The absence of tooth paste, soap, beds, food, water and other basic needs for detainees at detention centers is unconscionable.

"Detainees described overcrowding so severe that 'it was difficult to move in any direction without jostling and being jostled.' The water provided them was foul, 'of a dark color, and an ordinary glass would collect a thick sediment.' The 'authorities never removed any filth.' A detainee wrote that the 'only shelter from the sun and rain and night dews, was what we could make by stretching over us our coats or scraps of blanket.' As for the food, 'Our ration was in quality a starving one, it being either too foul to be touched or too raw to be digested.'"²

"(C)hildren at a facility in Clint, Texas, were sleeping on concrete floors and being denied soap and toothpaste. (Observers) described children as young as 7 and 8, many of them wearing clothes caked with snot and tears ... 'caring for infants they've just met.' A visiting

¹ 1. Rego v. Flores, 507 U.S. 292, 113 S. Ct. 1439, 123 L. Ed. 2d 1 (1993) ("Fifth Amendment entitles aliens to due process of law in deportation proceedings. U.S.C.A. Const. Amend. 5.")

² A Crime by Any Name. The Trump administration's commitment to deterring immigration through cruelty has made horrifying conditions in detention facilities inevitable. By Adam Serwer, July 3, 2019, <https://www.theatlantic.com/ideas/archive/2019/07/border-facilities/593239/>

Evidence Attach Exhibits
or Footnotes
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doctor called the detention centers 'torture facilities.' At least seven children have died in U.S. custody in the past year, compared with none in the 10 years prior. More than 11,000* children are now being held by the U.S. government on any given day. As if these conditions were insufficiently punitive, the administration has canceled recreational activities..." Id.

"At a processing center in El Paso, Texas, 900 migrants were 'being held at a facility designed for 125. In some cases, cells designed for 35 people were holding 155 people,' Id.

"The New York Times reported. One observer described the facility to Texas Monthly as a 'human dog pound.'" Id.

"The government's own investigators have found detainees in facilities run by Immigration and Customs Enforcement being fed expired food at detention facilities, 'nooses in detainee cells,' "inadequate medical care,' and 'unsafe and unhealthy conditions.' Id.

"An early-July inspector-general report found "dangerous overcrowding" in some Border Patrol facilities and included pictures of people crowded together like human cargo." Id.

"Some of the people detained by the U.S. government have entered the United States illegally or overstayed their visas; some are simply seeking to exercise their legal right to asylum." Id.

"Chilling first-hand reports of migrant detention centers highlight smell of 'urine, feces,' overcrowded conditions." ³

"Children at three of the five Border Patrol facilities we visited had no access to showers ... [and] limited access to a change of clothes." Id.

In all of this, Donald J. Trump has undermined the integrity of his office, by violating federal criminal law and the freedoms under the Constitution, and brought disrepute on the Presidency, and betrayed his trust as President in a manner subversive of constitutional government, to the great prejudice of the cause of law and justice and

³ Government officials and pediatricians who have toured border facilities give first-hand accounts of conditions. USA TODAY compiled their words. By, James Sargent, Elinor Aspegren, Elizabeth Lawrence and Olivia Sanchez, USA TODAY, Updated 10:32 a.m. EDT July 17, 2019
<https://www.usatoday.com/indepth/news/politics/elections/2019/07/16/migrant-detention-centers-described-2019-us-government-accounts/1694638001/>

to the manifest injury of the people of the United States.

ARTICLE II CRIME OF KIDNAPPING

The allegations contained in paragraphs above and are repeated and realleged as though fully set forth herein.

The President encouraged, aided and abetted and, or conspired with the kidnapping of individuals under implementation of his border policies.

18 U.S.C.A. § 1201, the federal kidnapping statute provides:

" (a) Whoever unlawfully seizes, confines, inveigles, decoys, kidnaps, abducts, or carries away and holds for ransom or reward or otherwise any person, except in the case of a minor by the parent thereof, when—

(1) the person is willfully transported in interstate or foreign commerce, regardless of whether the person was alive when transported across a State boundary, or the offender travels in interstate or foreign commerce or uses the mail or any means, facility, or instrumentality of interstate or foreign commerce in committing or in furtherance of the commission of the offense;

(2) any such act against the person is done within the special maritime and territorial jurisdiction of the United States;

(3) any such act against the person is done within the special aircraft jurisdiction of the United States as defined in section 46501 of title 49;

(4) the person is a foreign official, an internationally protected person, or an official guest as those terms are defined in section 1116(b) of this title; or

(5) the person is among those officers and employees described in section 1114 of this title and any such act against the person is done while the person is engaged in, or on account of, the performance of official duties,

shall be punished by imprisonment for any term of years or for life and, if the death of any person results, shall be punished by death or life imprisonment.

(b) With respect to subsection (a)(1), above, the failure to release the victim within twenty-four hours after he shall have been unlawfully seized, confined, inveigled, decoyed, kidnapped, abducted, or carried away shall create a rebuttable presumption that such person has been transported in interstate or foreign commerce. Notwithstanding the

bring Law

LONG LAW

preceding sentence, the fact that the presumption under this section has not yet taken effect does not preclude a Federal investigation of a possible violation of this section before the 24-hour period has ended.

(c) If two or more persons conspire to violate this section and one or more of such persons do any overt act to effect the object of the conspiracy, each shall be punished by imprisonment for any term of years or for life.

(d) Whoever attempts to violate subsection (a) shall be punished by imprisonment for not more than twenty years.

(e) If the victim of an offense under subsection (a) is an internationally protected person outside the United States, the United States may exercise jurisdiction over the offense if (1) the victim is a representative, officer, employee, or agent of the United States, (2) an offender is a national of the United States, or (3) an offender is afterwards found in the United States. As used in this subsection, the United States includes all areas under the jurisdiction of the United States including any of the places within the provisions of sections 5 and 7 of this title and section 46501(2) of title 49. For purposes of this subsection, the term "national of the United States" has the meaning prescribed in section 101(a)(22) of the Immigration and Nationality Act (8 U.S.C. 1101(a)(22)).

(f) In the course of enforcement of subsection (a)(4) and any other sections prohibiting a conspiracy or attempt to violate subsection (a)(4), the Attorney General may request assistance from any Federal, State, or local agency, including the Army, Navy, and Air Force, any statute, rule, or regulation to the contrary notwithstanding.

(g) Special Rule for Certain Offenses Involving Children.--

(1) To whom applicable.--If--

(A) the victim of an offense under this section has not attained the age of eighteen years; and

(B) the offender--

(i) has attained such age; and

(ii) is not--

(I) a parent;

(II) a grandparent;

- (III) a brother;
- (IV) a sister;
- (V) an aunt;
- (VI) an uncle; or
- (VII) an individual having legal custody of the victim;

the sentence under this section for such offense shall include imprisonment for not less than 20 years.

(h) As used in this section, the term "parent" does not include a person whose parental rights with respect to the victim of an offense under this section have been terminated by a final court order."

The President encouraged Americans and aliens to be recklessly placed in detention centers without probable cause or legal justification, in utter disregard to the rule of law.

Sorting them out later is unlawful imprisonment in violation of 18 U.S.C.A. § 1201. Due Process requires legal justification, probable cause, before detention.

In all of this, Donald J. Trump has undermined the integrity of his office, by violating federal criminal law and the freedoms under the Constitution, and brought disrepute on the Presidency, and betrayed his trust as President in a manner subversive of constitutional government, to the great prejudice of the cause of law and justice and to the manifest injury of the people of the United States.

Wherefore Donald J. Trump, by such conduct, warrants impeachment and trial, and removal from office.

*Save children
Please*

*Do not
the right
thing makes*

*You are
a winner.
even if
you do
not succeed
at first.
You win by
not giving up
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up. 17
Love & thanks
Mark.*

Porn Star

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**STORMY DANIELS
AND THE MISPAID
DOLLARS
ARTICLE OF
IMPEACHMENT**

116 TH CONGRESS

1ST SESSION

Impeaching Donald J. Trump, President of the United States, of high crimes and misdemeanors.

_____, 2019
_____ submitted the following resolution; which was referred to the _____

Impeaching Donald J. Trump, President of the United States, of high crimes and misdemeanors.

RESOLUTION

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President of the United States, is impeached for high crimes and misdemeanors, and that the following Articles of Impeachment to be exhibited to the Senate:

Articles of Impeachment to be exhibited by the House of Representatives of the United States of America in the name of itself and all of the people of the United States of America, against Donald J. Trump, President of the United States, in maintenance and support of its impeachment against him for high crimes and misdemeanors.

ARTICLE I

THE PRESIDENT'S VIOLATION OF CAMPAIGN FINANCE LAW

In his conduct while President of the United States, Donald J. Trump (herein also referred to as "President" or "Trump"), in violation of his constitutional oath to faithfully execute the office of President of the United States and, to the best of his ability, preserve, protect, defend and obey the Constitution of the United States, as well as his constitutional obligation to preserve, protect, defend and obey the laws of the land,

including the Criminal Statutes under the Internal Revenue Code.

Back Ground

A Campaign Finance Violations

The Federal Election Campaign Act of 1971, as amended, Title 52, United States Code, Section 30101, *et seq.*, (the "Election Act"), regulates the influence of money on politics. At all times relevant to the Information, the Election Act set forth the following limitations, prohibitions, and reporting requirements, which were applicable to President Donald J. Trump, and his campaign:

(a) Individual contributions to any presidential candidate, including expenditures coordinated with a candidate or his political committee, were limited to \$2,700 per election, and presidential candidates and their committees were prohibited from accepting contributions from individuals in excess of this limit.

(b) Corporations were prohibited from making contributions directly to presidential candidates, including expenditures coordinated with candidates or their committees, and candidates were prohibited from accepting corporate contributions.

On or about June 16, 2015, President Donald J. Trump (hereinafter also "Trump") began his presidential campaign.

While MICHAEL COHEN, continued to work at the Company and did not have a formal title with the campaign, he had a campaign email address and, at various times, advised the campaign, including on matters of interest to the press, and made televised and media appearances on behalf of the campaign.

At all times relevant to this Information, Corporation-1 was a media company that owns, among other things, a popular tabloid magazine ("Magazine-1").

In or about August 2015, the Chairman and Chief Executive of Corporation-1 ("Chairman-1"), in coordination with Michael Cohen ("Cohen"), and one or more members of the campaign, offered to help deal with negative stories about Donald J. Trump's relationships with women by, among other things, assisting the campaign in identifying such stories so they could be purchased and their publication avoided. Chairman-1 agreed to keep Cohen apprised of any such negative stories.

Consistent with the agreement described above, Corporation-1 advised MICHAEL COHEN, the defendant, of negative stories during the course of

the campaign, and COHEN, with the assistance of Corporation-1, was able to arrange for the purchase of two stories so as to suppress them and prevent them from influencing the election.

First, in or about June 2016, a model actress and Playboy Playmate Karen McDougal (McDougal) began attempting to sell her story of her alleged extramarital affair with Donald J. Trump that had taken place in 2006 and 2007, knowing the story would be of considerable value because of the election. Woman-1 retained an attorney ("Attorney-1"), who in turn contacted the editor-in-chief of Magazine-1 ("Editor-1"), and offered to sell McDougal's story to Magazine-1. Chairman-1 and Editor-1 informed Cohen, the defendant, of the story. At COHEN's urging and subject to Cohen's promise that Corporation-1 would be reimbursed, Editor-1 ultimately began negotiating for the purchase of the story.

On or about August 5, 2016, Corporation-1 entered into an agreement with McDougal) to acquire her "limited life rights" to the story of her relationship with "any then-married man," in exchange for \$150,000 and a commitment to feature her on two magazine covers and publish over one hundred magazine articles authored by her. Despite the cover and article features to the agreement, its principal purpose, as understood by those involved, including Cohen, and Trump, was to suppress McDougal's story so as to prevent it from influencing the election.

Between in or about late August 2016 and September 2016, MICHAEL COHEN, the defendant, agreed with Chairman-1 to assign the rights to the non-disclosure portion of Corporation-1's agreement with McDougal to COHEN for \$125,000. COHEN incorporated a shell entity called "Resolution Consultants LLC" for use in the transaction. Both Chairman-1 and COHEN ultimately signed the agreement, and a consultant for Corporation-1, using his own shell entity, provided COHEN with an invoice for the payment of \$125,000. However, in or about early October 2016, after the assignment agreement was signed but before COHEN had paid the \$125,000, Chairman-1 contacted COHEN and told him, in substance, that the deal was off and that COHEN should tear up the assignment agreement. COHEN did not tear up the agreement, which was later found during a judicially authorized search of his office.

Second, on or about October 8, 2016, an agent for an adult film actress Stephanie Clifford, also known as Stormy Daniels ("Clifford") informed Editor-1 that Clifford was willing to make public statements and confirm on the record her alleged past affair with Trump. Chairman-1 and Editor-1 then contacted Cohen, the defendant, and put him in touch with Attorney-1, who was also representing Clifford. Over the course of the next few days, Cohen negotiated a \$130,000 agreement with Attorney-1 to himself purchase Cohen's silence, and received a signed confidential settlement agreement and a separate side letter agreement from Attorney-1.

MICHAEL COHEN, the defendant, did not immediately execute the agreement, nor did he pay Clifford. On the evening of October 25, 2016, with no deal with Clifford finalized, Attorney-1 told Editor-1 that Clifford was close to completing a deal with another outlet to make her story public. Editor-1, in turn, texted

COHEN, the defendant, that "[w]e have to coordinate something on the matter [Attorney-1 is] calling you about or it could look awfully bad for everyone." Chairman-1 and Editor-1 then called COHEN through an encrypted telephone application. COHEN agreed to make the payment, and then called Attorney-1 to finalize the deal.

The next day, on October 26, 2016, MICHAEL COHEN emailed an incorporating service to obtain the corporate formation documents for another shell corporation, Essential Consultants LLC, which COHEN had incorporated a few days prior. Later that afternoon, COHEN drew down \$131,000 from a fraudulently obtained HELOC, and requested that it be deposited into a bank account COHEN had just opened in the name of Essential Consultants. The next morning, on October 27, 2016, COHEN went to Bank-3 and wired approximately \$130,000 from Essential Consultants to Attorney-1. On the bank form to complete the wire, COHEN falsely indicated that the "purpose of wire being sent" was "retainer." On or about November 1, 2016, COHEN received from Attorney-1 copies of the final, signed confidential settlement agreement and side letter agreement.

Trump through his agent Cohen, caused and made the payments described herein in order to influence the 2016 presidential election. In so doing, he coordinated with one or more members of the campaign, including through meetings and phone calls, about the fact, nature, and timing of the payments.

at the request of Trump,

As a result of the payments solicited and made by Cohen, the defendant, neither McDougal nor Clifford spoke to the press prior to the election.

In or about January 2017, Cohen, the defendant, in seeking reimbursement for election-related expenses, presented executives of the Company with a copy of a bank statement from the Essential Consultants bank account, which reflected the \$130,000 payment Cohen had made to the bank account of Attorney-1 in order to keep Woman-2 silent in advance of the election, plus a \$35 wire fee, adding, in handwriting, an additional "\$50,000." The \$50,000 represented a claimed payment for "tech services," which in fact related to work Cohen had solicited from a technology company during and in connection with the campaign. Cohen added these amounts to a sum of \$180,035. After receiving this document, executives of the Company "grossed up" for tax purposes Cohen's requested reimbursement of \$180,000 to \$360,000, and then added a bonus of \$60,000 so that Cohen would be paid \$420,000 in total. Executives of the Company also

determined that the \$420,000 would be paid to Cohen in monthly amounts of \$35,000 over the course of twelve months, and that Cohen should send invoices for these payments.

On or about February 14, 2017, Cohen, the defendant, sent an executive of the Company ("Executive-1") the first of his monthly invoices, requesting "[p]ursuant to [a]retainer agreement, payment for services rendered for the months of January and February, 2017." The invoice listed \$35,000 for each of those two months. Executive-1 forwarded the invoice to another executive of the Company ("Executive-2") the same day by email, and it was approved. Executive-1 forwarded that email to another employee at the Company, stating: "Please pay from the Trust. Post to legal expenses. Put 'retainer for the months of January and February 2017' in the description."

Throughout 2017, Cohen, sent to one or more representatives of the Company monthly invoices, which stated, "Pursuant to the retainer agreement, kindly remit payment for services rendered for" the relevant month in 2017, and sought \$35,000 per month.

The Company accounted for these payments as legal expenses. In truth and in fact, there was no such retainer agreement, and the monthly invoices COHEN submitted were not in connection with any legal services he had provided in 2017. During 2017, pursuant to the invoices described above, Cohen, the defendant, received monthly \$35,000 reimbursement checks, totaling \$420,000.

At all times Cohen acted on behalf of, at the request of or under the instruction of President Trump.

In so doing Trump violated campaign finance law.

B (Causing an Unlawful Corporate Contribution)

The allegations contained in paragraphs above and below are repeated and realleged as though fully set forth herein.

From in or about June 2016, up to and including in or about October 2016, in the Southern District of New York and elsewhere, Trump through his agent, Cohen, the defendant, knowingly and willfully caused a corporation to make a contribution and expenditure, aggregating \$25,000 and more during the 2016 calendar year, to the campaign of a candidate for President of the United States, to wit, Cohen caused Corporation-1 to make and advance a \$150,000 payment to Playboy Playmate Karen McDougal, including through the promise of reimbursement, so as to ensure that Playboy Playmate Karen McDougal did not publicize damaging allegations before the 2016 presidential election and thereby influence that election.

(Excessive Campaign Contribution)

The allegations contained in paragraphs above and are repeated and realleged as though fully set forth herein.

On or about October 27, 2016, in the Southern District of New York and elsewhere, Cohen, knowingly and willfully made and caused to be made a contribution to Trump, a candidate for Federal office, and his authorized political committee in excess of the limits of the Election Act, which aggregated \$25,000 and more in calendar year 2016, and did so by making and causing to be made an expenditure, in cooperation, consultation, and concert with, and at the request and suggestion of one or more members of the campaign, to wit, Cohen made a \$130,000 payment to porn star Stormy Daniels, whose real name is Stephanie Clifford to ensure that she did not publicize damaging allegations before the 2016 presidential election and thereby influence that election.

Upon information and belief Pres. Trump directed Cohen to commit a crime by paying two women for the principal purpose of influencing an election.

Cohen's lawyer Lanny Davis told the press, Donald Trump directed Cohen to commit a crime by paying payments to two women for the principal purpose of influencing an election.

Cohen also testified under oath at Capital Hill that Donald Trump directed Cohen to commit a crime by paying payments to two women for the purpose of influencing an election.

During his testimony on Capital Hill in February 2019, President Trump's attorney Michael Cohen submitted copies of checks that Trump, his son Donald Trump Jr. and the COO of the Trump Organization made to him — evidence intended to support Cohen's claim that the president engaged in possible criminal conduct while in office

Cohen provided a copy of a check that he says was personally signed by Trump in 2017 to reimburse him for paying off Stormy Daniels, an adult-film actress who had alleged having an affair with Trump.

Cohen testified, "I am providing a copy of a \$35,000 check that President Trump personally signed from his personal bank account on Aug. 1 of 2017 — when he was President of the United States — pursuant to the cover-up, which was the basis of my guilty plea, to reimburse me — the word used by Mr. Trump's TV lawyer — for the illegal hush money I paid on his behalf. This \$35,000 check was one of 11 check installments that was paid throughout the year, while he was President," according to Cohen at a House Committee on Oversight and Reform hearing.

Cohen advised, "The President of the United States thus wrote a personal check for the payment of hush money as part of a criminal scheme to violate campaign finance laws. You can find the details of that scheme,

directed by Mr. Trump, in the pleadings in the U.S. District Court for the Southern District of New York.”

Cohen also provided a second check ("Trust check") to Congress on Capitol Hill, from the Donald J. Trump- Revocable Trust Account to Cohen in the amount of \$35,000 check, dated March 17, 2017.

The Trust Check was signed by Donald Trump Jr. and Trump organization chief operating officer Allen Weisselberg — “to reimburse me for the hush money payments,” Cohen told the committee.

In all of this, Donald J. Trump has violated campaign finance law.

Criminal Violations under the Internal Revenue Code

The allegations contained in paragraphs above and are repeated and realleged as though fully set forth herein.

In his conduct while President of the United States, Donald J. Trump (herein also referred to as "President" or "Trump"), in violation of his constitutional oath to faithfully execute the office of President of the United States and, to the best of his ability, preserve, protect, defend and obey the Constitution of the United States, as well as his constitutional obligation to preserve, protect, defend and obey the laws of the land, including the Criminal Laws under the Internal Revenue Code.

Upon information and belief, Trump failed to report the payments made to Cohen, referred to above, to the Federal Election Commission.

Upon information and belief Trump directed payment to Cohen from an improper account in an attempt to influence an election.

It is not a lawful permitted purpose of any trust to make an unlawful payment out of a trust account, including the Donald J. Trump - Revocable Account.

Cohen accepted a payment in the amount of \$35,000.00 from the Donald J. Trump - Revocable Account.

It is not a lawful, permitted, purpose to make an unlawful payment out of Trump's personal account.

Cohen accepted an unlawful payment from Trump's personal account in the amount of \$35,000.00.

Upon information and belief Trump directed his agents to make unlawful payments to McDougal and Clifford in an attempt to influence an election.

Upon information and belief the payments to McDougal, Clifford and Cohen were not paid out of the campaign account required by the Federal Election Commission.

As aforementioned the payments to McDougal and Clifford exceeded lawful campaign limits.

The payments were not accurately reported with the Federal Elections Commission.

Since improper payments were made out of improper accounts, in unlawful amounts, Trump misstated information on tax forms relating to his campaign and possibly other entities.

The tax forms are signed under oath.

In doing so, upon information and belief, Trump violated the following criminal provisions of the internal revenue code.

A.

Pursuant to 26 U.S.C.A. § 7206. relating to fraud and false statements,
"Any person who--

(1) Declaration under penalties of perjury.--Willfully makes and subscribes any return, statement, or other document, which contains or is verified by a written declaration that it is made under the penalties of perjury, and which he does not believe to be true and correct as to every material matter; or

(2) Aid or assistance.--Willfully aids or assists in, or procures, counsels, or advises the preparation or presentation under, or in connection with any matter arising under, the internal revenue laws, of a return, affidavit, claim, or other document, which is fraudulent or is false as to any material matter, whether or not such falsity or fraud is with the knowledge or consent of the person authorized or required to present such return, affidavit, claim, or document; or

3) Fraudulent bonds, permits, and entries.--Simulates or falsely or fraudulently executes or signs any bond, permit, entry, or other document required by the provisions of the internal revenue laws, or by any regulation made in pursuance thereof, or procures the same to be falsely or fraudulently executed, or advises, aids in, or connives at such execution thereof; or

(4) Removal or concealment with intent to defraud.--Removes, deposits, or conceals, or is concerned in removing, depositing, or concealing, any goods or commodities for or in respect whereof any tax is or shall be imposed, or any property upon which levy is authorized by section 6331, with intent to evade or defeat the assessment or collection of any tax imposed by this title; or

(5) Compromises and closing agreements.--In connection with any compromise under section 7122, or offer of such compromise, or in connection with any closing agreement under section 7121, or offer to enter into any such agreement, willfully--

(A) Concealment of property.--Conceals from any officer or employee of the United States any property belonging to the estate of a taxpayer or other person liable in respect of the tax, or

(B) Withholding, falsifying, and destroying records.--Receives, withholds, destroys, mutilates, or falsifies any book, document, or record, or makes any false statement, relating to the estate or financial condition of the taxpayer or other person liable in respect of the tax; shall be guilty of a felony and, upon conviction thereof, shall be fined not more than \$100,000 (\$500,000 in the case of a corporation), or imprisoned not more than 3 years, or both, together with the costs of prosecution."

B

Pursuant to 26 U.S.C.A. § 7202. § 7202. Willful failure to collect or pay over tax

"Any person required under this title to collect, account for, and pay over any tax imposed by this title who willfully fails to collect or truthfully account for and pay over such tax shall, in addition to other penalties provided by law, be guilty of a felony and, upon conviction thereof, shall be fined not more than \$10,000, or imprisoned not more than 5 years, or both, together with the costs of prosecution." (emphasis intended).

Trump did not account for payments out of the campaign account for payments made to influence the election because he allowed, permitted or directed payments to be made out of different accounts.

The intent was in part to conceal the fact the payments exceeded campaign limits permitted since Trump did not want to get into trouble.

Upon information and belief, Trump has access to a former Circuit Court Judge, his sister and other attorneys.

Upon information and belief, Trump knew, or should have known, his conduct was improper, unlawful and or wrong.

C.

Pursuant to 26 U.S.C.A § 7201. Attempt to evade or defeat tax

Any person who willfully attempts in any manner to evade or defeat any tax imposed by this title or the payment thereof shall, in addition to other penalties provided by law, be guilty of a felony and, upon conviction thereof, shall be fined not more than \$100,000 (\$500,000 in the case of a corporation), or imprisoned not more than 5 years, or both, together with the costs of prosecution. (emphasis intended).

Trump willfully sought to evade reporting improper payments with the Federal Election Commission.

Trump willfully permitted payments out of an improper account with the intent, in part, to influence an election.

D.

Pursuant to 26 U.S.C.A § 7207. Fraudulent returns, statements, or other documents

"Any person who willfully delivers or discloses to the Secretary any list, return, account, statement, or other document, known by him to be fraudulent or to be false as to any material matter, shall be fined not more than \$10,000 (\$50,000 in the case of a corporation), or imprisoned not more than 1 year, or both. Any person required pursuant to section 6047(b), section 6104(d), or subsection (i) or (j) of section 527 to furnish any information to the Secretary or any other person who willfully furnishes to the Secretary or such other person any information known by him to be fraudulent or to be false as to any material matter shall be fined not more than \$10,000 (\$50,000 in the case of a corporation), or imprisoned not more than 1 year, or both." (emphasis intended).

Upon information and belief, Trump failed to report all payments made and or accepted with an intent to influence an election on his tax forms.

The fact payments were made from improper accounts is circumstantial evidence that Trump failed to report the money in proper accounts as required by the Federal Elections Commission.

In all of this, the President knowingly and willfully spoke and acted in a manner that violated the criminal laws under the Internal Revenue Code.

In so doing he has undermined the integrity of his office, by violating federal criminal law and the Constitution, and brought disrepute on the Presidency, and betrayed his trust as President in a manner subversive of constitutional government, to the great prejudice of the cause of law and

justice and to the manifest injury of the people of the United States.

Wherefore Donald J. Trump, by such conduct, warrants impeachment and trial, and removal from office ~~wherefore Donald J. Trump, by such conduct, warrants impeachment and trial, and removal from office~~ *e*

THIS CHECK IS PRINTED ON CHEMICAL REACTIVE PAPER WHICH CONTAINS A WATERMARK AND HAS MICRO PRINTING IN THE SIGNATURE LINE

DONALD J. TRUMP
725 5TH AVENUE
NEW YORK, NY 10022

CAPITAL ONE N.A.
37 WEST 87TH STREET
NEW YORK, NY 10019

60-7517214

NO.
002821

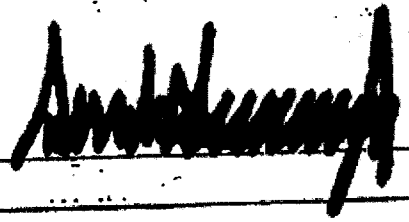
CHECK DATE
08/01/17

CHECK AMOUNT
****\$35,000.00**

PAY ****THIRTY FIVE THOUSAND DOLLARS AND NO CENTS****

TO THE
ORDER OF

MICHAEL D. COHEN ESQ
10A
NEW YORK, NY 10022



[Redacted line]

THIS CHECK IS PRINTED ON CHEMICAL REACTIVE PAPER WHICH CONTAINS A WATERMARK AND HAS MICRO PRINTING IN THE SIGNATURE LINE

DONALD J. TRUMP - REVOCABLE TRUST ACCOUNT
725 5TH AVENUE
NEW YORK, NY 10022

CAPITAL ONE, N.A.
87 WEST 87TH STREET
NEW YORK, NY 10019

80-791214

NO. 000147

CHECK DATE
03/17/17

CHECK AMOUNT
***\$35,000.00**

PAY **THIRTY FIVE THOUSAND DOLLARS AND NO CENTS*****

TO THE ORDER OF

MICHAEL D COHEN ESQ
[REDACTED]
10A
NEW YORK, NY 10022

TWO SIGNATURES NEEDED ON AMTS OVER \$10,000.

[Handwritten Signature]

[REDACTED]

State of Delaware
Secretary of State
Division of Corporations
Delivered 01:14 PM 09/30/2016
FILED 01:14 PM 09/30/2016
SR 20166016733 - File Number 6168356

**STATE of DELAWARE
LIMITED LIABILITY COMPANY
CERTIFICATE of FORMATION**

RESOLUTION CONSULTANTS LLC

First: The name of the limited liability company is Resolution Consultants LLC.

Second: The address of its registered office in the State of Delaware is 160 Greentree Drive, Suite # 101 in the City of Dover, County of Kent, Zip code 19904. The name of its registered agent at such address is National Registered Agents, Inc.

In Witness Whereof, the undersigned has executed this Certificate of Formation this 30th day of September, 2016.

By: /s/ Michael Cohen
Authorized Person

Name: Michael Cohen

State of Delaware
Secretary of State
Division of Corporations
Delivered 10:21 AM 10/17/2016
FILED 10:21 AM 10/17/2016
SR 20166227994 - File Number 6185135

**STATE of DELAWARE
LIMITED LIABILITY COMPANY
CERTIFICATE of FORMATION**

ESSENTIAL CONSULTANTS LLC

First: The name of the limited liability company is Essential Consultants LLC.

Second: The address of its registered office in the State of Delaware is 160 Greentree Drive, Suite # 101 in the City of Dover, County of Kent, Zip code 19904. The name of its registered agent at such address is National Registered Agents, Inc.

In Witness Whereof, the undersigned has executed this Certificate of Formation this 17th day of October, 2016.

By: /s/ Michael Cohen
Authorized Person

Name: Michael Cohen

ORIGINAL

Judge Pauley

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

MICHAEL COHEN,

Defendant.

INFORMATION

18 Cr. __ (WHP)

18 CRIM 602

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#:
DATE FILED: **AUG 21 2018**

The United States Attorney charges:

Background

The Defendant

1. From in or about 2007 through in or about January 2017, MICHAEL COHEN, the defendant, was an attorney and employee of a Manhattan-based real estate company (the "Company"). COHEN held the title of "Executive Vice President" and "Special Counsel" to the owner of the Company ("Individual-1").

2. In or about January 2017, COHEN left the Company and began holding himself out as the "personal attorney" to Individual-1, who at that point had become the President of the United States.

in addition to working for and earning income from 11 times relevant to this information, MICHAEL COHEN owned taxi medallions in New York City and millions of dollars. COHEN owned these taxi

I copied and pushed the tubber part from this AG's court.

00602-WHP

Judge

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Campaign Finance Violations

The United States Attorney further charges:

24. The Federal Election Campaign Act of 1971, as amended, Title 52, United States Code, Section 30101, et seq., (the "Election Act"), regulates the influence of money on politics. At all times relevant to the Information, the Election Act set forth the following limitations, prohibitions, and reporting requirements, which were applicable to MICHAEL COHEN, the defendant, Individual-1, and his campaign:

a. Individual contributions to any presidential candidate, including expenditures coordinated with a candidate or his political committee, were limited to \$2,700 per election, and presidential candidates and their committees were prohibited from accepting contributions from individuals in excess of this limit.

b. Corporations were prohibited from making contributions directly to presidential candidates, including expenditures coordinated with candidates or their committees, and candidates were prohibited from accepting corporate contributions.

25. On or about June 16, 2015, Individual-1 began his presidential campaign. While MICHAEL COHEN, the defendant, continued to work at the Company and did not have a formal title with the campaign, he had a campaign email address and, at various times, advised the campaign, including on matters of interest to

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the press, and made televised and media appearances on behalf of the campaign.

26. At all times relevant to this information, Corporation-1 was a media company that owns, among other things, a popular tabloid magazine ("Magazine-1").

27. In or about August 2015, the Chairman and Chief Executive of Corporation-1 ("Chairman-1"), in coordination with MICHAEL COHEN, the defendant, and one or more members of the campaign, offered to help deal with negative stories about Individual-1's relationships with women by, among other things, assisting the campaign in identifying such stories so they could be purchased and their publication avoided. Chairman-1 agreed to keep COHEN apprised of any such negative stories.

28. Consistent with the agreement described above, Corporation-1 advised MICHAEL COHEN, the defendant, of negative stories during the course of the campaign, and COHEN, with the assistance of Corporation-1, was able to arrange for the purchase of two stories so as to suppress them and prevent them from influencing the election.

29. First, in or about June 2016, a model and actress ("Woman-1") began attempting to sell her story of her alleged extramarital affair with Individual-1 that had taken place in 2006 and 2007, knowing the story would be of considerable value because

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of the election. Woman-1 retained an attorney ("Attorney-1"), who in turn contacted the editor-in-chief of Magazine-1 ("Editor-1"), and offered to sell Woman-1's story to Magazine-1. Chairman-1 and Editor-1 informed MICHAEL COHEN, the defendant, of the story. At COHEN's urging and subject to COHEN's promise that Corporation-1 would be reimbursed, Editor-1 ultimately began negotiating for the purchase of the story.

30. On or about August 5, 2016, Corporation-1 entered into an agreement with Woman-1 to acquire her "limited life rights" to the story of her relationship with "any then-married man," in exchange for \$150,000 and a commitment to feature her on two magazine covers and publish over one hundred magazine articles authored by her. Despite the cover and article features to the agreement, its principal purpose, as understood by those involved, including MICHAEL COHEN, the defendant, was to suppress Woman-1's story so as to prevent it from influencing the election.

31. Between in or about late August 2016 and September 2016, MICHAEL COHEN, the defendant, agreed with Chairman-1 to assign the rights to the non-disclosure portion of Corporation-1's agreement with Woman-1 to COHEN for \$125,000. COHEN incorporated a shell entity called "Resolution Consultants LLC" for use in the transaction. Both Chairman-1 and COHEN ultimately signed the agreement, and a consultant for Corporation-1, using

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his own shell entity, provided COHEN with an invoice for the payment of \$125,000. However, in or about early October 2016, after the assignment agreement was signed but before COHEN had paid the \$125,000, Chairman-1 contacted COHEN and told him, in substance, that the deal was off and that COHEN should tear up the assignment agreement. COHEN did not tear up the agreement, which was later found during a judicially authorized search of his office.

32. Second, on or about October 8, 2016, an agent for an adult film actress ("Woman-2") informed Editor-1 that Woman-2 was willing to make public statements and confirm on the record her alleged past affair with Individual-1. Chairman-1 and Editor-1 then contacted MICHAEL COHEN, the defendant, and put him in touch with Attorney-1, who was also representing Woman-2. Over the course of the next few days, COHEN negotiated a \$130,000 agreement with Attorney-1 to himself purchase Woman-2's silence, and received a signed confidential settlement agreement and a separate side letter agreement from Attorney-1.

33. MICHAEL COHEN, the defendant, did not immediately execute the agreement, nor did he pay Woman-2. On the evening of October 25, 2016, with no deal with Woman-2 finalized, Attorney-1 told Editor-1 that Woman-2 was close to completing a deal with another outlet to make her story public. Editor-1, in turn, texted

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MICHAEL COHEN, the defendant, that "[w]e have to coordinate something on the matter [Attorney-1 is] calling you about or it could look awfully bad for everyone." Chairman-1 and Editor-1 then called COHEN through an encrypted telephone application. COHEN agreed to make the payment, and then called Attorney-1 to finalize the deal.

34. The next day, on October 26, 2016, MICHAEL COHEN, the defendant, emailed an incorporating service to obtain the corporate formation documents for another shell corporation, Essential Consultants LLC, which COHEN had incorporated a few days prior. Later that afternoon, COHEN drew down \$131,000 from the fraudulently obtained HELOC, discussed above in paragraphs 19 through 21, and requested that it be deposited into a bank account COHEN had just opened in the name of Essential Consultants. The next morning, on October 27, 2016, COHEN went to Bank-3 and wired approximately \$130,000 from Essential Consultants to Attorney-1. On the bank form to complete the wire, COHEN falsely indicated that the "purpose of wire being sent" was "retainer." On or about November 1, 2016, COHEN received from Attorney-1 copies of the final, signed confidential settlement agreement and side letter agreement.

35. MICHAEL COHEN, the defendant, caused and made the payments described herein in order to influence the 2016

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presidential election. In so doing, he coordinated with one or more members of the campaign, including through meetings and phone calls, about the fact, nature, and timing of the payments.

36. As a result of the payments solicited and made by MICHAEL COHEN, the defendant, neither Woman-1 nor Woman-2 spoke to the press prior to the election.

37. In or about January 2017, MICHAEL COHEN, the defendant, in seeking reimbursement for election-related expenses, presented executives of the Company with a copy of a bank statement from the Essential Consultants bank account, which reflected the \$130,000 payment COHEN had made to the bank account of Attorney-1 in order to keep Woman-2 silent in advance of the election, plus a \$35 wire fee, adding, in handwriting, an additional "\$50,000." The \$50,000 represented a claimed payment for "tech services," which in fact related to work COHEN had solicited from a technology company during and in connection with the campaign. COHEN added these amounts to a sum of \$180,035. After receiving this document, executives of the Company "grossed up" for tax purposes COHEN's requested reimbursement of \$180,000 to \$360,000, and then added a bonus of \$60,000 so that COHEN would be paid \$420,000 in total. Executives of the Company also determined that the \$420,000 would be paid to COHEN in monthly amounts of \$35,000 over the course of

twelve months, and that COHEN should send invoices for these payments.

38. On or about February 14, 2017, MICHAEL COHEN, the defendant, sent an executive of the Company ("Executive-1") the first of his monthly invoices, requesting "[p]ursuant to [a] retainer agreement. . . . payment for services rendered for the months of January and February, 2017." The invoice listed \$35,000 for each of those two months. Executive-1 forwarded the invoice to another executive of the Company ("Executive-2") the same day by email, and it was approved. Executive-1 forwarded that email to another employee at the Company, stating: "Please pay from the Trust. Post to legal expenses. Put 'retainer for the months of January and February 2017' in the description."

39. Throughout 2017, MICHAEL COHEN, the defendant, sent to one or more representatives of the Company monthly invoices, which stated, "Pursuant to the retainer agreement, kindly remit payment for services rendered for" the relevant month in 2017, and sought \$35,000 per month. The Company accounted for these payments as legal expenses. In truth and in fact, there was no such retainer agreement, and the monthly invoices COHEN submitted were not in connection with any legal services he had provided in 2017.

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40. During 2017, pursuant to the invoices described above, MICHAEL COHEN, the defendant, received monthly \$35,000 reimbursement checks, totaling \$420,000.

COUNT 7
(Causing an Unlawful Corporate Contribution)

The United States Attorney further charges:

41. The allegations contained in paragraphs 1 through 3, and 24 through 40 are repeated and realleged as though fully set forth herein.

42. From in or about June 2016, up to and including in or about October 2016, in the Southern District of New York and elsewhere, MICHAEL COHEN, the defendant, knowingly and willfully caused a corporation to make a contribution and expenditure, aggregating \$25,000 and more during the 2016 calendar year, to the campaign of a candidate for President of the United States, to wit, COHEN caused Corporation-1 to make and advance a \$150,000 payment to Woman-1, including through the promise of reimbursement, so as to ensure that Woman-1 did not publicize damaging allegations before the 2016 presidential election and thereby influence that election.

(Title 52, United States Code, Sections 30118(a) and 30109(d)(1)(A), and Title 18, United States Code, Section 2(b).)

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COUNT 8
(Excessive Campaign Contribution)

The United States Attorney further charges:

43. The allegations contained in paragraphs 1 through 3, and 24 through 40 are repeated and realleged as though fully set forth herein.

44. On or about October 27, 2016, in the Southern District of New York and elsewhere, MICHAEL COHEN, the defendant, knowingly and willfully made and caused to be made a contribution to Individual-1, a candidate for Federal office, and his authorized political committee in excess of the limits of the Election Act, which aggregated \$25,000 and more in calendar year 2016, and did so by making and causing to be made an expenditure, in cooperation, consultation, and concert with, and at the request and suggestion of one or more members of the campaign, to wit, COHEN made a \$130,000 payment to Woman-2 to ensure that she did not publicize damaging allegations before the 2016 presidential election and thereby influence that election.

(Title 52, United States Code, Sections 30116(a)(1)(A), 30116(a)(7), and 30109(d)(1)(A), and Title 18, United States Code, Section 2(b).)

Begin forwarded message:

From: Meghan Kelly <megkellyesq@yahoo.com>

Date: 2/21/2020

To: Kenneth Mcdowell <kennetha.mcdowell@state.de.us>, Anthony J Albence <anthony.albence@delaware.gov>, erikjschramm@gmail.com, Jesse Chadderdon <jesse@deldems.org>, Meghan Kelly <electmegkelly@icloud.com>, coe_campaignfinance@state.de.us, Meghan Kelly <megkellyesq@yahoo.com>

Subject: Bo/ is awesome even though this decision is not

Hi Bo and good morning Mr. Albence, Jesse and Honorable Chairman,

My waiver relates solely on religious reasons.

Even if I had the money, it would still violate my belief in Jesus's teachings since the money may be used to pay people to support or buy support for candidate's giving into the temptation of voting for whoever buys you. " owe nothing to anyone but to love them"

Candidates should not be bought, bartered by those who can afford to pay folks to create the illusion of popularity when in truth it is mere deep pockets.

In addition such money may be used to contribute to Matthew 6 violations leading many to harm and hell by teaching them to worship the mark of the beast.

This is no small matter for me Bo. I actually believe Jesus Christ and understand the Bible as the Holy Spirit was reflected out of certain people who laid down their will, their desires, by choosing God's will, God's purpose, despite the hardships it caused.

Bo, I do not want to attach checks on public record and thus compromise the accounts.

So I think I will include such payments on my pleading. So do not perform unnecessary legal research Attorney generals office or democrats.


I will show the fact that I paid the filing fee in the past and the Democratic contributions in the past, and will explain how I grew to understand this too violates Jesus's teachings.


I do not want to disobey Jesus and serve Satan by violating his teachings thereby misleading others to believe such evil is good. You are not the enemy despite disagreeing on me on the important issue. Injustice is the enemy.

I did not know it was evil. (It is possible that even adults like myself can learn and grow). I learned it was, as I discovered corruption even by our own party, Yipes. I do not want to compromise my soul by contributing to such corruption.

Bo, I might send you an email to confirm I have the dates right. (Bo is a Saint. He is like an angel sent by God. He patiently helped me with most of all the filings in 2018. This potential

law suit is not a reflection upon his kind efforts. It is a reflection upon the bad choice of those with the power to choose to persecute me based on my faith in Jesus Christ)

I am so happy to look through emails to see how kind you have been to me Bo.  It is not your fault those in power made an unlawful decision Bo.

Thank you 

EXHIBIT

8

Federal Congress
Please Kill the License to Drill

My name is Meghan Kelly. I ran as a Democrat candidate for House of Representatives in the 38th District, and was defeated. The Republican candidate was Mr. Ronald E. Gray. Mr. Gray and I appear to agree on some matters, including our opposition to oil drilling.

I applaud my opponent for openly taking a stand against oil drilling. I too strongly oppose drilling off shore of our beautiful Delaware coast. Unfortunately, only the federal legislators, not the state legislators can prevent this. So, neither of us can prevent oil drilling by passing state laws.

President Trump's authority to drill oil under Executive Order 13795 is granted through a statute, not the Constitution. The Federal Congress has the ability to remove his authority to drill oil by amending the statute granting the President such power by passing either HR 341. The timing Congress may use this power effectively is limited.

Once the drilling starts, it will be difficult to stop. Certain defenses such as promissory estoppel and detrimental reliance may prevent attorneys from stopping it in court. So, it is important for federal legislators to act swiftly.

To worsen matters, on April 10, 2019, President Trump two additional executive orders that allegedly has expedited the leasing of offshore spaces for oil drilling, Executive Orders 13867 and 13868.

Please urge the Federal legislators to act now!

The administration cleverly timed the offshore leases with knowledge of distractions that may prevent our leaders from acting within a timely fashion.

1. People get blind sighted by dollar signs dancing before their eyes. The Bureau of Ocean Energy Management (BOEM) is handing out money to various entities to perform research on the suitability of offshore work.
2. The federal legislators are focused on the election instead of drafting laws.
3. The United States Supreme Court is back logged.

By the time the Court hears the case, even if the required legislation is passed, it may be too late to prevent it. Conversely, there is also a danger litigation may be brought too early. There is only a short window to act, please federal congressmen, help us.

The current cases pending before the United States Supreme Court will likely be kicked out should they be heard too early (not ripe for adjudication), as there is no standing. Meaning the potential injury is not concrete. It is too speculative since the BOEM has not narrowed the scope of exactly where they will permit drilling off shore. Instead, the BOEM is providing funds to Universities and other organizations to perform studies on the suitability of offshore drilling and potential impact.

Any jobs that may be created by drilling are not worth the potential injury to our loved one's health, lives and livelihoods in our beautiful resort towns.

Please persuade our federal representatives to remove President Trump's authority to drill before we become another Dakota pipeline.

Passing HR 341 will not remove the government's ability to lease offshore territory for alternative energy sources such as, solar, wind or wave power. Please encourage our legislators to keep an open mind. Learning makes us smarter. Do not be scared of alternative clean energy. Be scared of dirty energy causing pollution that has been linked to human and environmental death.

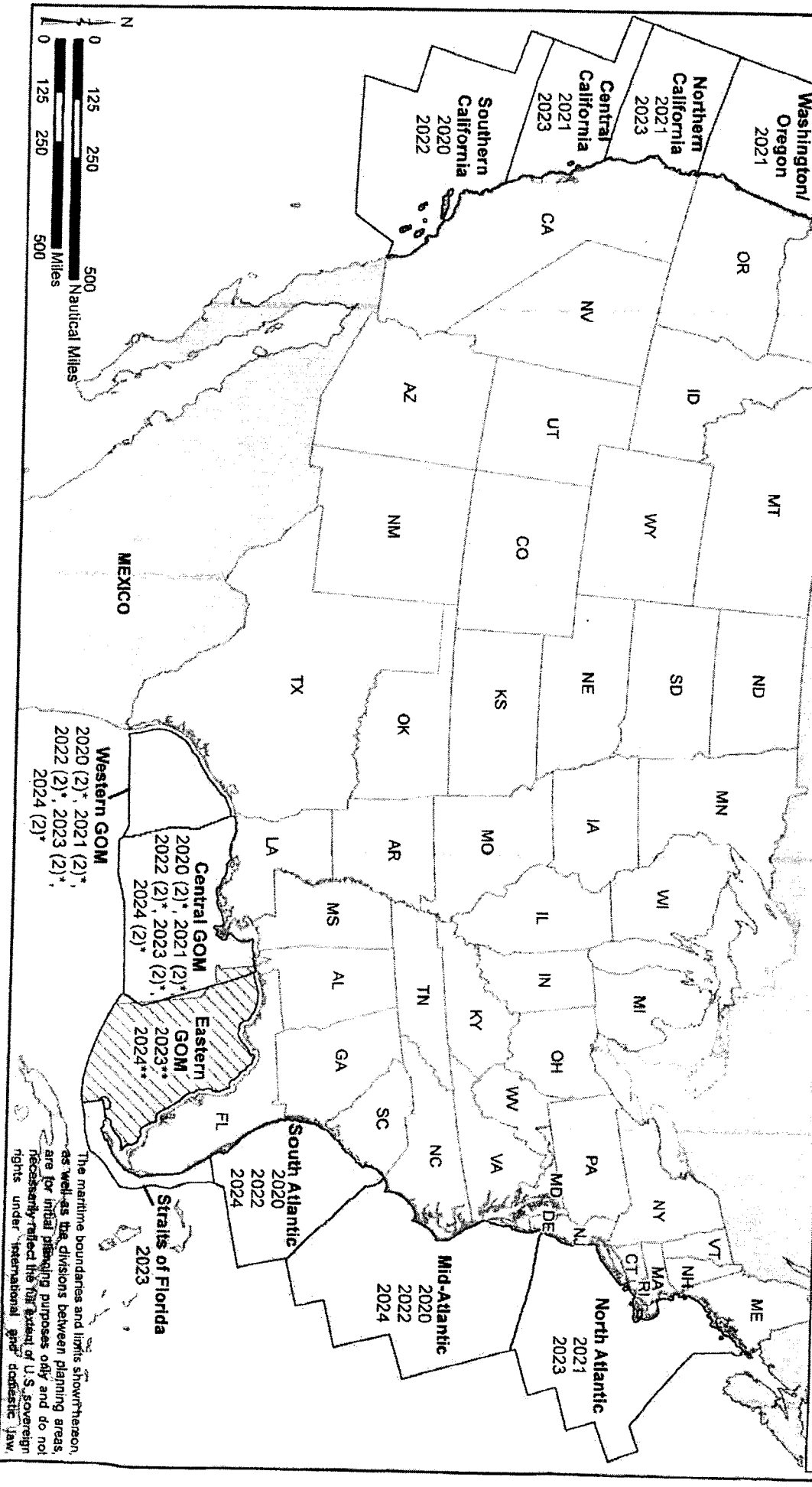
Thank you for your time and consideration to this important matter.



**2019–2024 Outer Continental Shelf Oil and Gas Leasing
Draft Proposed Program Areas and Sale Years: Lower 48 States**

Planning Area Boundary
 Draft Proposed Program Area
 Congressional Moratorium (expires June 30, 2022)

Key: * All available areas, not including those subject to the GOMESA moratorium through June 30, 2022.
 ** Those areas available following the expiration of the GOMESA moratorium.



The maritime boundaries and limits shown hereon, as well as the divisions between planning areas, are for initial planning purposes only and do not necessarily reflect the full extent of U.S. sovereign rights under international and domestic law.

EXHIBIT

9

82 FR 21675

Vol. 82, No. 088, Part IV, Tuesday, May 9, 2017

Presidential Documents

Reporter

82 FR 21675 *

Federal Register > 2017 > May > Tuesday, May 9, 2017 > Presidential Documents > PRESIDENT OF THE UNITED STATES

Title: Title 3--

The President

Promoting Free Speech and Religious Liberty

Agency

PRESIDENT OF THE UNITED STATES

Identifier: Executive Order 13798 of May 4, 2017

Text

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. [*21676]

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

FEDERAL REGISTER

End of Document

EXHIBIT

26



Coronavirus Updates (/coronavirus/)

WORLD POPULATION

7,818,590,570

Current World Population (/world-population/)

110,491,952

Births this year

358,078

Births today

46,387,169

Deaths this year

150,330

Deaths today

64,104,783

Net population growth this year

207,748

Net population growth today

GOVERNMENT & ECONOMICS

\$ 14,221,044,524

Public Healthcare expenditure today

\$ 9,702,623,677

Public Education expenditure today

\$ 4,382,796,756

Public Military expenditure today

62,641,100

Cars produced this year

110,357,073

Bicycles produced this year

196,124,620

Computers produced this year

SOCIETY & MEDIA

2,122,253

New book titles published this year

442,915,065

Newspapers circulated today

623,559

TV sets sold worldwide today

6,152,429

Cellular phones sold today

\$ 274,506,257

Money spent on videogames today

4,706,561,069

Internet users in the world today

247,930,210,432

Emails sent today

6,698,239

Blog posts written today

739,729,128

Tweets sent today

6,973,958,995

Google searches today

ENVIRONMENT

4,101,691

Forest loss this year (hectares)

5,521,986

Land lost to soil erosion this year (ha)

28,549,808,072

CO2 emissions (/co2-emissions/) this year (tons)

9,464,485

Desertification this year (hectares)

7,723,318 tons

Toxic chemicals released
in the environment this year

FOOD

846,683,184

Undernourished people in the world

1,700,347,870

Overweight people in the world

767,616,381

Obese people in the world

28,584

People who died of hunger today

\$ 546,893,049

Money spent for obesity related
~~\$132,607,114~~ USA today
Money spent on weight loss
programs in the USA today

WATER

3,457,114,083

Water used this year (million L)

664,131

Deaths caused by water related
diseases this year

797,148,315

People with no access to
a safe drinking water source

ENERGY

436,261,380

Energy used today (MWh), of which:

371,370,321

- from non-renewable sources (MWh)

65,697,159

- from renewable sources (MWh)

2,733,635,488,240 MWh

Solar energy striking Earth today

89,477,112

Oil pumped today (barrels)

1,494,158,441,575

Oil left (barrels)

15,582

Days to the end of oil (~43 years)

1,093,025,497,537

Natural Gas left (boe)

57,528

Days to the end of natural gas

4,312,184,396,239

Coal left (boe)

148,696

Days to the end of coal

HEALTH

10,238,060

Communicable disease deaths this year

385,622

Seasonal flu deaths this year

5,994,588

Deaths of children under 5 this year

33,564,346

Abortions this year

243,763

Deaths of mothers during birth this year

42,175,662

HIV/AIDS infected people

1,325,775

Deaths caused by HIV/AIDS this year

6,477,140

Deaths caused by cancer this year

773,575

Deaths caused by malaria this year

14,148,185,471

Cigarettes smoked today

3,942,499

Deaths caused by smoking this year

1,972,493

Deaths caused by alcohol this year

845,710

Suicides this year

\$ 315,499,406,180

Money spent on illegal drugs this year

1,064,599

Road traffic accident fatalities this year

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EXHIBIT

43

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

July 20, 2018

Guest Column

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 alleged 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://deeds.doe.k12.de.us>

License No. 18929

Issue Date: September 25, 2006
Effective Date:
Expiration Date:

State of Delaware

Department of Education

Initial License

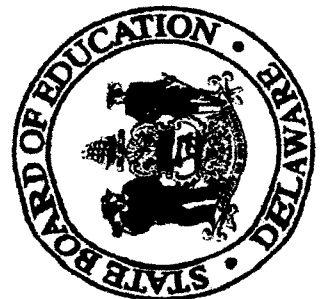
Know all persons by these Present, that

Meghan Marie Kelly, Esq.

has fulfilled the Licensure and Certification requirements of the Professional Standards Board and is certified in the following area(s):

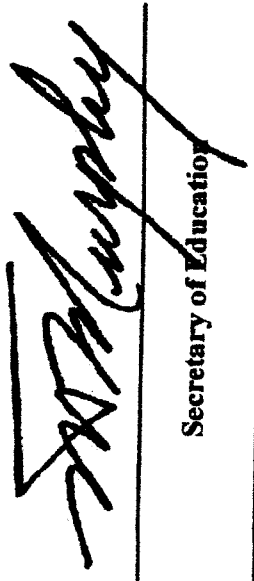
- STANDARD: Teacher of Elementary Grades K-6 **
- STANDARD: Teacher of Exceptional Children Grades K-12
- STANDARD: Teacher of Health Education Grades 5-12
- STANDARD: Teacher of Middle Level Mathematics Grades 6-8 **
- STANDARD: Teacher of Physical Education Grades K-12
- STANDARD: Teacher of Social 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 Provisions Required to Reinstiate His or Her License/Certificate


Secretary of Education

LAW Transcript

DUQUESNE UNIVERSITY

Record as of: 07/01/05

600 FORBES AVENUE PITTSBURGH, PA 15282-0299

MS. MEGHAN M. KELLY

DEGREE: JURIS DOCTOR

MAJOR: Juris Doctor - Day

Student ID:

MINOR:

SEM	COURSE DESCRIPTION	DEPT	CAT	GRD	ATT	COMPL	G.PTS	SEM	COURSE DESCRIPTION	DEPT	CAT	T	COMPL	G.PTS
02-FAL	LEGAL PROCESS AND PROCEDURE	LAW	C156		3.00	3.00	7.5000	02-FAL	COMMERCIAL TRANSACTIONS I	LAW	C446	00	3.00	8.2500
	SEMESTER GPA = 2.5000 CUMULATIVE GPA = 2.500				3.00	3.00	7.5000		APPELLATE PRACTICE & PROC	LAW	C419	00	0.00	0.0000
	CONTRACTS	LAW	C15		6.00	6.00	15.0000	02-FAL	SEMESTER GPA = 3.1667 CUMULATIVE GPA = 3.175			00	12.00	28.5000
	PROPERTY	LAW	C11		6.00	6.00	19.5000		CONFLICTS OF LAW	LAW	C12	00	3.00	10.5000
	TORTS	LAW	C10		6.00	6.00	18.0000		BANKRUPTCY	LAW	C85	00	2.00	7.0000
	CIVIL PROCEDURE I	LAW	C39		3.00	3.00	9.7500		FED COURTS & THE FED SYS	LAW	C91	00	3.00	9.7500
	CRIMINAL LAW & PROCEDURE	LAW	C37		3.00	3.00	11.0000		ROMAN LAW	LAW	C144	00	2.00	7.5000
	LEGAL RESEARCH AND WRITING	LAW	C129		3.00	3.00	11.2500		COMMERCIAL TRANSACTIONS II	LAW	C448	00	3.00	9.7500
02-SPL	SEMESTER GPA = 3.1250 CUMULATIVE GPA = 3.1845				18.00	18.00	87.5000	02-SPL	SEMESTER GPA = 3.4231 CUMULATIVE GPA = 3.218			00	13.00	64.5000
	SEM CAL ST WRONG CRIM CONV	LAW	C191		2.00	2.00	7.5000		TOTALS CRED CPT = 86.00					
03-SUL	SEMESTER GPA = 3.7500 CUMULATIVE GPA = 3.1061				2.00	2.00	7.5000							
	LABOR LAW	LAW	C79		3.00	3.00	9.0000							
	HEALTH CARE FINANCE	LAW	C204		2.00	2.00	7.5000							
	EVIDENCE SECT B	LAW	C335		3.00	3.00	10.5000							
03-FAL	SEMESTER GPA = 3.3750 CUMULATIVE GPA = 3.1585				8.00	8.00	27.0000							
	LAW AND MEDICINE	LAW	C12		2.00	2.00	7.0000							
	CONSTITUTIONAL LAW - SECT B	LAW	C28		3.00	3.00	15.0000							
	TAXATION	LAW	C10		2.00	2.00	13.0000							
	CORPORATIONS-SECT B	LAW	C136		3.00	3.00	13.0000							
	FAMILY LAW	LAW	C76		2.00	2.00	7.0000							
03-SPL	SEMESTER GPA = 3.1553 CUMULATIVE GPA = 3.1820				10.00	10.00	55.0000							
	TRIAL COURT CLERKSHIP	LAW	C242		3.00	3.00	0.0000							
04-SUL	SEMESTER GPA = 0.0000 CUMULATIVE GPA = 3.187				3.00	3.00	0.0000							
	PROFESSIONAL RESPONSIBILITY	LAW	C36		3.00	3.00	0.0000							
	ESTATES AND TRUSTS	LAW	C429		3.00	3.00	9.7500							
	TRIAL ADVOCACY	LAW	C91		3.00	3.00	10.5000							

JURIS DOCTOR Degree Awarded on 06/05

Majors: _____ Minors: _____ Specializations: _____

Juris Doctor - Day

RAISED SEAL NOT REQUIRED

This official University transcript is printed on Secured paper

any does not require a raised seal

Patrick E. Jakub
 Patrick E. Jakub
 University Registrar

ISSUED
 TO STUDENT

MEGHAN M. KELLY

Name: Meghan Marie Kelly

SEX: FEMALE

DATE OF BIRTH: 06/11/02

ACADEMIC YEAR: 8

TRANSCRIPT LEGEND

This transcript shows a semester plan in addition to semester, a 5-week winter session and summer sessions during 5-week and 7 1/2 week courses. The unit of credit is the semester credit hour which is generally based on one period (60 minutes) of lecture, laboratory or other instructional work per semester. For shorter sessions the length of the period and number of sessions per week is in order to effect instructional time comparable to that in regular semester.

University of Delaware adopted a grading system effective Fall 1991.

FINAL GRADES

- A Excellent Quality points 4.00 per credit
- B Very Good 3.50 per credit
- B- Good 3.00 per credit
- C+ 2.50 per credit
- C 2.00 per credit
- C- 1.50 per credit
- D 1.00 per credit
- D- 0.50 per credit
- F Failing - No credit
- F- Failing - No credit
- W Withdrawal - No credit
- NC Non-Credit - No credit
- NR No Record - No credit
- NI No Information - No credit
- WF Withdrawal - Failing
- WU Withdrawal - Unexcused

TEMPORARY GRADES

- 1 Incomplete - Progress
- U Unsatisfactory Progress
- N No Grade Reported by Instructor

EXCUSED STUDENTS

- 001-009 Non-degree courses
- 100-199 Introductory level courses
- 200-299 Introductory/developmental courses
- 300-399 Advanced courses
- 500-599 Graduate level courses
- 500-599 Ph.D. thesis courses

Graded credit earned at the University of Delaware only to those students who are presently registered and formally accepted students in a Graduate program.

FURNISHED AT THE REQUEST OF STUDENT AND NOT RELEASE TO OTHERS WITHOUT CONSENT OF STUDENT

The word COPY appears when developed. A black and white document is being created.

Current Academic Program:
College of Arts and Science
Bachelor of Arts
Major: History Education

UNIVERSITY OF DELAWARE Degrees Conferred:
Bachelor of Arts
College of Arts and Science
Major: History
Rank: 1213 of 3124 in class, 13 of 73 in History
Graduation GPA: 3.159

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

Completed Program:
Fall 1996

EDST-247	PROF. ISSUES/HIST PERSPECTIVES	3	10.000
ENGL-110	CRITICAL READING & WRITING	(3)	
IPER-120	EXERCISE AND CONDITIONING	1	4.000
MATH-251	MATH FOR ELEMENTARY SCHOOL	3	11.000
POSC-240	INTRO TO INTERNATIONAL RELATIONS	3	6.000
THEA-104	INTRO TO THEATRE AND DRAMA	3	8.000
Term		16	13.00
Cumulative		16	13.00
			39.000

Winter 1997

BISC-207	INTRODUCTORY BIOLOGY I	(4)	
HIST-206	UNITED STATES HISTORY	3	12.000
IPER-120	BEGINNING BALLROOM DANCE	1	
Term		8	4.00
Cumulative		24	17.00
			51.000

Spring 1997

BISC-207	INTRODUCTORY BIOLOGY I	4	12.000
ENGL-110	CRITICAL READING & WRITING	3	7.000
GEOL-113	EARTH SCIENCE	4	12.000
IPER-120	WALK FOR FITNESS	1	4.000
MATH-252	MATH FOR ELEMENTARY SCHOOL I	3	9.000
Term		15	15.00
Cumulative		39	32.00
			31.95.000

NC ENTRIES BELOW THIS LINE *****

Transferred To:
College of Arts and Science
Bachelor of Arts
Major: History Education

Fall 1997

EDST-210	INTRO TO HIST AND HIST TEACHING	3	11.000
EDST-203	HUMAN DEVELOPMENT THROUGH 5-8	3	9.000
HIST-101	WESTERN CIV IL 1648	3	12.000
MATH-253	MATH FOR ELEMENTARY SCHOOL III	3	7.000
SCM-101	PHYSICAL SCIENCE	4	14.667
Term		16	16.00
Cumulative		55	48.00
			47.148.667

Academic Status: Dean's List.

Winter 1998

HIST-102	WESTERN CIV:1648-PRES EN	3	8.000
Term		3	3.00
Cumulative		58	51.00
			50.150.667

Spring 1998

ECOR-152	INTRO MACROECON: MATH I	3	10.000
GEOG-102	HUMAN GEOGRAPHY	3	8.000
HIST-103	WORLD HISTORY TO 1648	3	11.000
HIST-200	NUTRITION CONCEPTS	3	10.000
POSC-313	AMERICAN FOREIGN POLICY	3	9.000
Term		15	15.00
Cumulative		73	56.00
			65.204.667

Fall 1998

ECOR-151	INTRO MICROECON: PRICING & MARKET	3	10.000
ECOR-120	WORLD REGIONAL GEOGRAPHY	3	7.000
HIST-104	WORLD HISTORY:1648 TO PRESENT	3	11.000
POSC-105	AMERICAN POLITICAL SYSTEM	3	9.000
SPAN-106	SPANISH I - ELEMENTARY	4	9.333
Term		16	16.00
Cumulative		89	82.00
			81.241.000

Winter 1999

SPAN-107	SPANISH II - INTERMEDIATE	4	10.667
SPAN-207	CONTIMPORARY LATIN AMERICA I	3	11.000
Term		7	7.00
Cumulative		96	89.00
			88.272.667

NO ENTRIES BELOW THIS LINE *****

NO ENTRIES BELOW THIS LINE *****

UNIVERSITY OF DELAWARE

UNIVERSITY OF DELAWARE DEPARTMENT OF ADVANCE STUDIES

EDST-247	PROF. ISSUES/HIST PERSPECTIVES	3	10.000
ENGL-110	CRITICAL READING & WRITING	(3)	
IPER-120	EXERCISE AND CONDITIONING	1	4.000
MATH-251	MATH FOR ELEMENTARY SCHOOL	3	11.000
POSC-240	INTRO TO INTERNATIONAL RELATIONS	3	6.000
THEA-104	INTRO TO THEATRE AND DRAMA	3	8.000
Term		16	13.00
Cumulative		16	13.00
			39.000

BISC-207	INTRODUCTORY BIOLOGY I	4	12.000
ENGL-110	CRITICAL READING & WRITING	3	7.000
GEOL-113	EARTH SCIENCE	4	12.000
IPER-120	WALK FOR FITNESS	1	4.000
MATH-252	MATH FOR ELEMENTARY SCHOOL I	3	9.000
Term		15	15.00
Cumulative		39	32.00
			31.95.000

NAME: Meghan Marie Kelly

SEX: FEMALE

DATE OF BIRTH:

SSN:

06/11/02

8

TRANSCRIPT LEGEND

ACADEMIC YEAR

The University follows a semester plan. In addition to two semesters, a 5-week winter session and summer sessions offering 5-week and 7 1/2 week classes are held. The unit of credit is the semester credit hour which is generally based on one hour of instruction of lecture, laboratory or quiz, recitation, pre-work per semester. For shorter sessions the length of the period and/or number of sessions per week is the standard to alter standard credit time considered to be an equivalent session.

University of Delaware adopted a 4+ grading system effective Fall 1991.

FINAL GRADES

Grade	Quality Points
A	4.00 per credit
A-	3.67 per credit
B+	3.33 per credit
B	3.00 per credit
B-	2.67 per credit
C+	2.33 per credit
C	2.00 per credit
C-	1.67 per credit
D	1.33 per credit
D-	1.00 per credit
F	0.00 per credit
W	0.00 per credit
NC	0.00 per credit

TEMPORARY GRADES

- 1 - Incomplete
- 2 - Satisfactory Progress
- 3 - Under Review
- 4 - Under Review
- 5 - Under Review
- 6 - Under Review
- 7 - Under Review
- 8 - Under Review
- 9 - Under Review
- 10 - Under Review
- 11 - Under Review
- 12 - Under Review
- 13 - Under Review
- 14 - Under Review
- 15 - Under Review
- 16 - Under Review
- 17 - Under Review
- 18 - Under Review
- 19 - Under Review
- 20 - Under Review

CHANGE NUMBERS

- 001-009 Non-degree courses
- 100-199 Introductory level courses
- 200-299 Introductory/intermediate courses
- 300-399 Advanced courses
- 400-499 Graduate level courses
- 500-599 Ph.D level courses

Graduate credit is granted in the University of Delaware only to those students who are properly registered as formally admitted students in a graduate program.

UNIVERSITY OF DELAWARE
DO NOT REMOVE TO OTHERS WITHOUT
CONSENT OF STUDENT

The word "COR" appears when photocopied. A black line will document the original document.

Spring 1999

Course	Term	Grade	Quality Points	Credits
ECON 300	12	12.00	12	39.000
ECON 301	12	12.00	12	39.000
ECON 302	12	12.00	12	39.000
ECON 303	12	12.00	12	39.000
ECON 304	12	12.00	12	39.000
ECON 305	12	12.00	12	39.000
Cumulative				998/3294

Fall 1999

Course	Term	Grade	Quality Points	Credits
ECON 300	12	12.00	12	39.000
ECON 301	12	12.00	12	39.000
ECON 302	12	12.00	12	39.000
ECON 303	12	12.00	12	39.000
ECON 304	12	12.00	12	39.000
ECON 305	12	12.00	12	39.000
Cumulative				1714/4569

Winter 2000

Course	Term	Grade	Quality Points	Credits
HIST-367	12	12.00	12	43.000
THEA-102	12	12.00	12	43.000
Cumulative				1363/4003

Spring 2000

Course	Term	Grade	Quality Points	Credits
GSCC-382	12	12.00	12	43.000
HIST-268	12	12.00	12	43.000
HIST-343	12	12.00	12	43.000
PHIL-302	12	12.00	12	43.000
POSC-387	12	12.00	12	43.000
THEA-200	12	12.00	12	43.000
Cumulative				310.000

Fall 2000

Course	Term	Grade	Quality Points	Credits
EDUC-420	12	12.00	12	43.000
HESC-368	12	12.00	12	43.000
HIST-368	12	12.00	12	43.000
HIST-440	12	12.00	12	43.000
HIST-491	12	12.00	12	43.000
POSC-380	12	12.00	12	43.000
Cumulative				1449/3931

Spring 2001

Course	Term	Grade	Quality Points	Credits
EDUC-400	12	0.00	0	0.000
HIST-493	12	144.00	143	451.667
Cumulative				170

Requirements completed for Bachelor of Arts.

Spring 2002

Course	Term	Grade	Quality Points	Credits
EDUC-400	12	12.00	12	43.000
HIST-493	12	12.00	12	43.000
Cumulative				182

NO ENTRIES BELOW THIS LINE

Course	Term	Grade	Quality Points	Credits
EDUC-400	12	12.00	12	43.000
HIST-493	12	12.00	12	43.000
Cumulative				182

UNIVERSITY OF DELAWARE

MEGHAN MARIE KELLY

1971-02-06

SEEBE MEDICAL CENTER
224 SAVANNAH ROAD
LEWES, DELAWARE 19958
(302) 645-9900

DATE OF ADMISSION: 11-4-95
DATE OF DISCHARGE: 11-4-95

DISCHARGE SUMMARY

FINAL DIAGNOSIS: Serous cyst of the left ovary with torsion.

HISTORY: She is a 41 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 region. 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 110/84. On the abdominal exam, the abdomen was flat, soft with hyperactive bowel sounds. Pelvic exam - The vagina showed normal mucosa. Cervix showed no inflammation. The uterus was midline and felt soft. 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.

Nowell Washburn
Nowell Washburn, M.D.

MM/nas
dictated: 11-14-95
transcribed: 11-24-95
cc: Dr. Washburn

EXHIBIT

50

Meg for President

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939
(302) 537-1089

The Clerk's Office
The United States Supreme Court
1 First Street, NE
Washington, DC 20543

RE: Meghan Kelly, Waiver State Filing Fees & Signature Requirements, President

April 3, 2019

Dear Honorable Supreme Court Justice Ruth Bader Ginsburg:

I am considering running for the President of the United States. Unfortunately, in order to successfully run, I would have to violate my religious beliefs. Thus, per both Karen's and with Madeline's kind encouragement from this Honorable Court's Clerk's Office, I am writing to respectfully seek a writ of mandamus waiving each state's signature and fee requirements to allow me to be on each state's ballot without violating my religious beliefs.

I am a Christian, and I find guidance in the Bible. Pursuant to the Bible, Jesus says, "The greatest among you is your servant." (Citing, Matthew 23:11). Accordingly, living to serve self is not great. In fact, I believe the root of corruption in both business and government is serving those who serve you, thereby serving yourself, instead of the people you are supposed to serve, all the American people.

We are called to love those beyond our own even our opponents. I believe people sin against God when they merely serve their own children and families, and those who serve or affect them, instead of all the people they are appointed to serve in their position

of life.. Jesus said even evil people care for their children. (See, Matthew 7:9-12, "Which of you, if your son asks for bread, will give him a stone? Or if he asks for a fish, will give him a snake? If you, then, though you are evil, know how to give good gifts to your children..."). Jesus said even those without God love those who love them, and greet those who greet them. (See, Luke 6:32-35, "if you love those who love you, what credit is that to you? Even sinners love those who love them. And if you do good to those who are good to you, what credit is that to you? Even sinners do that. But love your enemies, do good to them, and lend to them, expecting nothing in return. Then your reward will be great, and you will be sons of the Most High; for He is kind to the ungrateful and wicked"); (See also, Romans 12:14); (See Matthew 5:44-45, "But I tell you, love your enemies and pray for those who persecute you, that you may be sons of your Father in heaven."); (Matthew 5:46-47, "If you love those who love you, what reward will you get?... And if you greet only your people, what are you doing more than others? Do not even the pagans do that?").

I believe God calls us to love God foremost and to love others, even those outside of our own, even our enemies, as ourselves. (See, Matthew 22:36-40, The greatest command in the bible is to love God. Subordinately, Love others as yourself. All commands are weighted on these.).

Leaders who serve themselves and those who serve them are not good leaders. They are servers of self not public servants. The prophets in the Old testament, John the Baptist, Jesus and the apostles all bravely and courageously confronted leaders who did evil, by serving themselves instead of those they were charged with serving.

In Ezekiel Chapter 34:1-10, God scolds leaders, shepherd who take advantage of the sheep to serve themselves instead of caring for them. "Woe to you shepherd of Israel who only take care of yourselves! Should not shepherds take care of the flock? You eat the curds, clothe yourself with wool and slaughter the choice animals, but you do not take care of the flock...." Id.

My religious beliefs prevent me from gathering enough money to pay people to help me collect signatures and pay filing fees. I will not collect fees from individuals or lobbyists as this violates my religious beliefs against partiality and favoritism, serving those who serve me, thereby serving myself, by potential invisible strings attached to such donations.

The caveat is, I would be willing to accept donations from the democrat party as they cannot buy me or influence me since I am already a Democrat. I am a Democrat because they love people, not money. Democrats tend to serve people, not greed. I believe people go to hell for seeking money in place of God. (See Matthew 6:24, and Luke 16:13, "You can not serve God and money."). I would be a misleader, not a leader, if I taught people to serve greed instead of teaching them to care for one another since I believe serving greed leads many to hell. (See, Acts 8:20, "Peter answered: 'May your money perish with you, because you thought you could buy the gift of God with money!"). People are more valuable than money. God commands us to love people not money. In John 13:34, Jesus said "A new command I give you: Love one another. As I have loved you, so you must love one another."

I am a leader because I think for myself after analyzing facts and laws. I will seek to do what is in the best interest of the American people, not what immediately pleases

some of their immediate desires only to harm them down the line. That is wrong. I take responsibility for my decisions made on behalf of others, and I will not be influenced by money or support. I do not believe the Democratic parties in each state will support me though I support their love for people and the environment over profit. I am against two positions the party heads seem to support. ¹

¹ I do not encourage or support abortion and the death with dignity acts. I believe they harm people, or potential people not only here, but in eternity too. I would be a bad leader if I led people I served to harm people or themselves for mere temporary ease, comfort or profit. I am against abortion. I do not believe they go to heaven. I believe they were robbed of the opportunity to be born of flesh and born of spirit. (See John Chapter 3:3-8, "Jesus replied, Very truly I tell you, no one can see the kingdom of God unless they are born again. ... Jesus answered, Very truly I tell you, no one can enter the kingdom of God unless they are born of water and the Spirit. Flesh gives birth to flesh, but the Spirit gives birth to spirit..."). Accordingly, the potential people not only lost life in this life, they lost eternal life too.

I am also against the Death with Dignity Acts. Many people may make mistakes, even professionals and experts such as doctors and health care professionals. None of us are gods. They may misunderstand or may lie for money or convenience. So great injustice may result. Ignorance or error will not reverse the harm done.

Further, I believe people may go to hell for killing themselves. It is not loving to encourage those you serve to die and go to hell out of convenience, comfort, martyrdom for the temporary convenience for themselves or other people, or to save money. People are more valuable than money, things or comfort. There are two examples of people who killed themselves and went to hell in the bible. King Saul in the Old Testament, and Judas Iscariot.

Pursuant to 1 Samuel 31:4, "...Saul took his sword and fell on it." Saul killed himself. In 1 Chronicles 10:13 provides, "Saul died because he was unfaithful to the LORD; he did not keep the word of the LORD..." I do not believe he went to heaven because of these words.

The other example is Judas Iscariot. In Matthew 27:1-10, Judas said sorry, confessed his sin, gave the 30 shekles back. Unfortunately he gave into despair instead of repenting by faith and trust in God's love and mercy. He killed himself instead of living to love God and love those God loves, everybody even our enemies.

In John 17:12, Jesus says, "he was doomed to destruction." So, I do not believe Judas escaped Satan's goal damnation.

I believe we live or die for God. Citing, Romans 14:8. Those who live and die for self or for mere people instead of God do not go to heaven. I believe Jesus was not kidding when he said you who love mother and father more than me are not worthy of me. You who love son and daughter more than me are not worthy of me. Citing, Matthew 10:37. I believe Jesus was not kidding when he said unless your "righteousness exceeds that of the scribes you will" not go to heaven. Matthew 5:20. How? Through the righteousness of Abraham. Abraham believed what God said. His belief was attributed to righteousness. Citing, Genesis 15:6. Abraham listened to God to the point he was willing to sacrifice his own son. This righteousness was attributed to Lot when he listened to God's word. He did not even turn around when his wife turned into a pile of salt. See, Genesis 19:26. Thus, we should obey the greatest command to love God and love others. Love does not encourage harm in this life and eternal life for mere material convenience. See, Romans 13:10.

My beliefs are genuine. I ran for local office and espoused the same beliefs on collecting donations and fundraising. (Please see Exhibits, 1, 2, 3, 4).

My faith in Christ is genuine. I confronted the Delaware Supreme Court when they violated my religious rights to affirm instead of swear into the Delaware Bar. (See Exhibit, 5).

I twice rejected appointments to family law matters as violating my religious beliefs (See Exhibits 6, 7).

I confronted the Courts in Delaware per the attached letter concerning impartiality and bias. (See Exhibit 8); (Also see, Leviticus 19:15 "You must not pervert justice; you must not show partiality to the poor or favoritism to the rich; you are to judge your neighbor fairly"); (see, Exodus 23:6, "You shall not deny justice to the poor in their lawsuits."); (see, Deuteronomy 16:19, "Do not deny justice or show partiality"); (also see, Deuteronomy 1:17, "Show no partiality in judging; hear both small and great alike. Do not be intimidated by anyone, for judgment belongs to God. And bring to me any case too difficult for you, and I will hear it.").

I am against the Death with Dignity Acts because I believe the most important time of our lives is at the end pursuant to the Bible. In Ecclesiastes 7:1, "the day of death better than the day of birth." In Ezekiel, the Bible says if you do good all of your life and turn away from the good, none of the good will be remembered. In Ezekiel, it says if you do evil all of your life and turn away from the evil, none of the evil will be remembered. (See, Ezekiel 18:21-24, Also see Ezekiel 33:12-16). Further, in the Parable of the Sower in Matthew Chapter 13, only those who understood and kept the truth in the end were saved from hell. Also in Matthew 24: 13, we learn that only those "who stand firm in the end" will be saved.

On an aside, I believe non christians may go to heaven (or hell) through Jesus on that last day. See, Hebrews Chapter 11. Also see many verses about the new covenant written on our hearts. When I think of tribes in unreachable parts of the land I think of Romans 2:15. "They show that the requirements of the law are written on their hearts, their consciences also bearing witness, and their thoughts sometimes accusing them and at other times even defending them." See also, Jeremiah 17:1, Nehemiah 7:5, Ezekiel 36:26 relating to God's law or God written in our heart..

I understand with the acceptance of the cloak of government power I will lose some of my power to speak on my personal religious beliefs in order to uphold the freedoms of those I serve and prevent a chilling affect.

I even shared my view on what using the name of God in vain means when I proposed a suggestion to Senator Tom Carper of Delaware. (See, Exhibit 9). I believe it means using the name of God, or religion or scripture for man's purpose instead of a true religious purpose.

I believe it would be wrong to collect donations from those outside of the Democratic party such as lobbyists and people as it would create the appearance of influence and favoritism in violation of the bible's teachings as we are called to serve everyone's best interests, not merely those who support us, or pay us with lobbyists money. That is a sin against God. (See, James 2: "do not show favoritism."); (James 2:9, "But if you show favoritism, you sin and are convicted by the law as transgressors."); (Deuteronomy 16:19, "Do not deny justice or show partiality. Do not accept any bribes, for a bribe blinds the eyes of the wise and twists the words of the righteous."); (Proverbs 18:5, "Showing partiality to the wicked is not good, nor is depriving the innocent of justice."); (Proverbs 24:23, "These also are sayings of the wise: To show partiality in judgment is not good."); (Malachi 2:9, "So I in turn have made you despised and humiliated before all the people, because you have not kept My ways, but have shown partiality in matters of the law."); (Job 34:19, "who shows no partiality to princes and does not favor the rich over the poor, for they are all the work of his hands?"); (Job 13:10, "Surely He would rebuke you if you secretly showed partiality.").

Accepting donations from lobbyists and individuals creates an expectation of a return in violation of God's instructions. In Romans 13:8 the Bible teaches: "Owe nothing to anyone except for your obligation to love one another..." The acceptance of

money from individuals and lobbyists creates an appearance that I am bought. That violates the bible's teachings on impartiality.

I believe it would be wrong to pay a team to support me by gathering signatures in various states. I would be buying votes, by buying support. That is wrong. Votes should not be bought. I should not earn support with money. I should try to gain support with true leadership, love for others, by service to others by presenting my plans to take care of Americans relating to healthcare, social security, and the environment.

On an aside, to alleviate your fears, I understand there are not only checks and balances within the three branches of government, there are also internal checks and balances within each of the individual branches. With the acceptance of the cloak of government authority, I understand my rights will be more limited in order to uphold those I hope to serve. My rights to speak out on my faith will be more limited in order to uphold the religious freedoms of the American people should I be elected. Americans should worship or not according to the dictates of their own conscience, not the dictates of the government. I will treat everyone with respect regardless of religion, race, gender or place of origin. I am not scared to love those outside of my own. I am commanded to.

Since, I do not wish to violate the Bible's teachings on impartiality, I respectfully, request that each state's filing fees and signature requirements be waived.

Thank you for your time and consideration.

Very truly,

/s/Meghan M. Kelly
Meghan Kelly, Esquire
DE Bar Number 4968

Supreme Court says not ripe

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939
(302) 537-1089



The Clerk's Office
The United States Supreme Court
1 First Street, NE
Washington, DC 20543

RE: Meghan Kelly, Waiver State Filing Fees & Signature Requirements, President

April 3, 2019

Dear Honorable Supreme Court Justice Sonia Maria Sotomayor:

I am considering running for the President of the United States. Unfortunately, in order to successfully run, I would have to violate my religious beliefs. Thus, per both Karen's and with Madeline's kind encouragement from this Honorable Court's Clerk's Office, I am writing to respectfully seek a writ of mandamus waiving each state's signature and fee requirements to allow me to be on each state's ballot without violating my religious beliefs.

I am a Christian, and I find guidance in the Bible. Pursuant to the Bible, Jesus says, "The greatest among you is your servant." (Citing, Matthew 23:11). Accordingly, living to serve self is not great. In fact, I believe the root of corruption in both business and government is serving those who serve you, thereby serving yourself, instead of the people you are supposed to serve, all the American people.

We are called to love those beyond our own even our opponents. I believe people sin against God when they merely serve their own children and families, and those who serve or affect them, instead of all the people they are appointed to serve in their position

**SUPREME COURT OF THE UNITED STATES
OFFICE OF THE CLERK
WASHINGTON, DC 20543-0001**

April 10, 2019

Meghan Kelly
34012 Shawnee Drive
Dagsboro, DE 19939

RE: Waiver State Filing Fees & Signature Requirements

Dear Ms. Kelly:

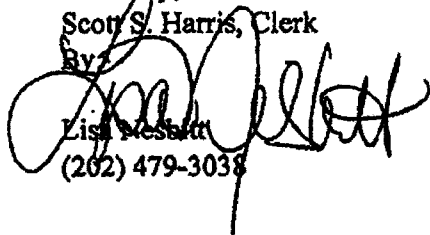
The enclosed papers were received on April 8, 2019. These papers fail to comply with the Rules of this Court and are herewith returned.

You may seek review of a decision only by filing a timely petition for writ of certiorari. The papers you submitted are not construed to be a petition for writ of certiorari. Should you choose to file a petition for writ of certiorari, you must submit the petition within the 90 day time limit allowed under Rule 13 of the Rules of this Court. A Copy of the Rules of this Court and a sample petition for a writ of certiorari are enclosed.

Your case must first be reviewed by a United States court of appeals or by the highest state court in which a decision could be had. 28 USC 1254 and 1257.

Sincerely,
Scott S. Harris, Clerk

By:



Lisa Nesbitt
(202) 479-3038

Enclosures

(c) a notarized affidavit or declaration in compliance with 28 U.S.C. § 1746, reciting the facts and circumstances of service in accordance with the appropriate paragraph or paragraphs of this Rule, whenever service is made by any person not a member of the Bar of this Court and not an attorney appointed to represent a party under the Criminal Justice Act of 1964, see 18 U.S.C. § 3006A(d)(5), or under any other applicable federal statute.

6. Every document, except a joint appendix or *amicus curiae* brief, filed by or on behalf of a nongovernmental corporation shall contain a corporate disclosure statement identifying the parent corporations and listing any publicly held company that owns 10% or more of the corporation's stock. If there is no parent or publicly held company owning 10% or more of the corporation's stock, a notation to this effect shall be included in the document. If a statement has been included in a document filed earlier in the case, reference may be made to the earlier document (except when the earlier statement appeared in a document prepared under Rule 33.2), and only amendments to the statement to make it current need be included in the document being filed. In addition, whenever there is a material change in the identity of the parent corporation or publicly held companies that own 10% or more of the corporation's stock, counsel shall promptly inform the Clerk by letter and include, within that letter, any amendment needed to make the statement current.

7. In addition to the filing requirements set forth in this Rule, all filers who are represented by counsel must submit documents to the Court's electronic filing system in conformity with the "Guidelines for the Submission of Documents to the Supreme Court's Electronic Filing System" issued by the Clerk.

Rule 30. Computation and Extension of Time

1. In the computation of any period of time prescribed or allowed by these Rules, by order of the Court, or by an appli-

cable statute, the day of the act, event, or default from which the designated period begins to run is not included. The last day of the period shall be included, unless it is a Saturday, Sunday, federal legal holiday listed in 5 U.S.C. § 6103, or day on which the Court building is closed by order of the Court or the Chief Justice, in which event the period shall extend until the end of the next day that is not a Saturday, Sunday, federal legal holiday, or day on which the Court building is closed.

2. Whenever a Justice or the Clerk is empowered by law or these Rules to extend the time to file any document, an application or motion seeking an extension shall be filed within the period sought to be extended. An application to extend the time to file a petition for a writ of certiorari to file a jurisdictional statement must be filed at least 10 days before the specified final filing date as computed under these Rules; if filed less than 10 days before the final filing date, such application will not be granted except in the most extraordinary circumstances.

3. An application to extend the time to file a petition for a writ of certiorari, to file a jurisdictional statement, to file a reply brief on the merits, or to file a petition for rehearing of any judgment or decision of the Court on the merits shall be made to an individual Justice and presented and served on all other parties as provided by Rule 22. Once denied, such an application may not be renewed.

4. A motion to extend the time to file any document or paper other than those specified in paragraph 8 of this Rule may be presented in the form of a letter to the Clerk setting out specific reasons why an extension of time is justified. The letter shall be served on all other parties as required by Rule 29. The motion may be acted on by the Clerk in the first instance, and any party aggrieved by the Clerk's action may request that the motion be submitted to a Justice or to the Court. The Clerk will report action under this paragraph to the Court as instructed.

RULES

OF THE

**Supreme Court of the
United States**

ADOPTED SEPTEMBER 27, 2017

EFFECTIVE NOVEMBER 13, 2017

Meg Kelly
for House of Representatives

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939
(302) 537-1089

The Honorable Democratic Chair Erik Raser-Schramm
Delaware Democratic Party
19 E Commons Blvd.
New Castle, DE 19720

(302) 328-9036
C/O Jesse Chadderon
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RE: Meghan Kelly, Waiver State Filing Fees & Signature Requirements, President

October 28, 2019

Dear Honorable Democratic Chairman for the state of Delaware, Erik Raser-Schramm:

I desire to run for House of Representatives for the state of Delaware.

Unfortunately, in order to successfully run, I would have to violate my religious beliefs.

Thus, I am writing to respectfully seek a waiver each the signature and fee requirements to allow me to be on each state's ballot in each of the three counties without violating my religious beliefs.¹

¹ The Democratic Chair has the power to waive fees. See, *Bartley v. Davis*, No. CIV.A. 8561, 1986 WL 8810, at *1-2 (Del. Ch. Aug. 14, 1986), *aff'd*, 519 A.2d 662 (Del. 1986), (The Honorable Chancery Court noted, "This [filing fee] requirement has long been a method to effectuate the above purposes and past political practice, according to the Chairmen of the Delaware Democratic and Republican Parties, has permitted this requirement to be waived.")

The Honorable Supreme Court, on appeal, noted that the party Chair only has statutory authority to waive such fees prior to the filing deadline. ("Attempted filing fee waiver of democratic state chairman, acting for democratic state committee after notification date, was invalid. 15 Del.C. §§ 3103(c), 3106." *Bartley v. Davis*, No. CIV.A. 8561, 1986 WL 8810, at *5 (Del. Ch. Aug. 14, 1986), *aff'd*, 519 A.2d 662 (Del. 1986), Citing, *Bartley v. Davis*, 519 A.2d 662 (Del. 1986)").

Also see, *Bellitskus v. Pizzingrilli*, 343 F.3d 632 (3d Cir. 2003) ("State's power to regulate elections must be exercised in a manner consistent with the Equal Protection Clause of the Fourteenth Amendment. U.S.C.A. Const. Art. 1, § 4, cl. 1; U.S.C.A. Const. Amend. 14.") *Id.* ("When First and Fourteenth Amendment rights are subjected to severe restrictions under state election regulation, the regulation must be narrowly drawn to advance a state interest of compelling importance; however, when a state election law provision imposes only reasonable, nondiscriminatory restrictions upon the First and Fourteenth Amendment rights of voters,

I am a Christian, and I find guidance in the Bible. Pursuant to the Bible, Jesus says, "The greatest among you is your servant." (Citing, Matthew 23:11). Accordingly, living to serve self is not great. In fact, I believe the root of corruption in both business and government is serving those who serve you, thereby serving yourself, instead of the people you are supposed to serve.

We are called to love those beyond our own even our opponents. I believe people sin against God when they merely serve their own children and families, and those who serve or affect them, instead of all the people they are appointed to serve in their position

the State's important regulatory interests are generally sufficient to justify the restrictions. U.S.C.A. Const.Amends. 1, 14"); Id (Indigent candidates' "as applied" equal protection challenge to Pennsylvania's mandatory filing fee requirements was not moot under "capable of repetition, yet evading review" exception to mootness doctrine, although election in which they ran had been held; challenge was too short in duration to be fully litigated prior to its expiration, and given lack of evidence to the contrary, it was reasonable to assume that the candidates would once again seek waiver of mandatory fees due to indigency. U.S.C.A. Const.Amend. 14; 25 P.S. § 2873(b.1).")

Also see *Biener v. Calio*, No. C.A. 02-514 GMS, 2003 WL 151232, at *2 (D. Del. Jan. 21, 2003), *aff'd*, 361 F.3d 206 (3d Cir. 2004) ("A person desiring to be a candidate for statewide office must tender a copy of the Candidate Filing Form to the chair of the state committee of his or her political party, and must further tender a copy of such Form, along with the required filing fee, to the Commissioner. Del.Code Ann. tit. 15, § 3106(a)(1)(b).").

Please allow me to tender such form without fee or signatures requirements PLEASE. Please give me a chance to run for House of Representatives without selling my soul by compromising my integrity and belief in Jesus Christ for an opportunity to help others. Compromising my faith will hurt those I hope to serve. Cheating to win matters. It is wrong. Cheating God matters to me. Breaking Jesus's command in Matthew 6 is cheating. Should I be elected, I will safeguard the Constitutional laws we all hold dear by impeaching the President should he be reelected. Please also give me a chance to draft federal laws that make the wealthy wrong doers instead of the victims of their greed and tax payers pay for alleviating the harm they cause. Please, I beg of you. I am analyzing the laws. America will not be okay down the line unless we choose to alleviate the economic strains instead of profiting from them. We must serve the people, not exploit and harm them for profit.

The negative consequences of deregulation and the defunding of the federal government that will impact Delawareans down the road is the greatest issue legislators must address, and not hide from. We need to prepare for what is ahead, a short fall of expected federal funds, which will lead to a short fall of state and local funds. Deregulation sounds great until you realize you must increase local taxes to pay for things or go without. The Federal government gives money to Delaware, in part, under its authority under Article I Section 8 of the Constitution, the Spending Clause. Delaware receives money with strings attached, called regulations. If Delaware doesn't adhere to the regulations, we do not receive money. As the federal government deregulates, it will continue to defund programs in Delaware. That means state and local governments must pay for more or go without. We must also prepare for the removal of environmental laws by the Federal Government to prevent harm by creating policies and local laws to protect, preserve and maintain our beautiful beach environment.

of life.. Jesus said even evil people care for their children. (See, Matthew 7:9-12, "Which of you, if your son asks for bread, will give him a stone? Or if he asks for a fish, will give him a snake? If you, then, though you are evil, know how to give good gifts to your children..."). Jesus said even those without God love those who love them, and greet those who greet them. (See, Luke 6:32-35, "if you love those who love you, what credit is that to you? Even sinners love those who love them. And if you do good to those who are good to you, what credit is that to you? Even sinners do that. But love your enemies, do good to them, and lend to them, expecting nothing in return. Then your reward will be great, and you will be sons of the Most High; for He is kind to the ungrateful and wicked"); (See also, Romans 12:14); (See Matthew 5:44-45, "But I tell you, love your enemies and pray for those who persecute you, that you may be sons of your Father in heaven."); (Matthew 5:46-47, "If you love those who love you, what reward will you get?... And if you greet only your people, what are you doing more than others? Do not even the pagans do that?").

I believe God calls us to love God foremost and to love others, even those outside of our own, even our enemies, as ourselves. (See, Matthew 22:36-40, The greatest command in the bible is to love God. Subordinately, Love others as yourself. All commands are weighted on these.).

Leaders who serve themselves and those who serve them are not good leaders. They are servers of self not public servants. The prophets in the Old testament, John the Baptist, Jesus and the apostles all bravely and courageously confronted leaders who did evil, by serving themselves instead of those they were charged with serving.

In Ezekiel Chapter 34:1-10, God scolds leaders, shepherd who take advantage of the sheep to serve themselves instead of caring for them. "Woe to you shepherd of Israel who only take care of yourselves! Should not shepherds take care of the flock? You eat the curds, clothe yourself with wool and slaughter the choice animals, but you do not take care of the flock..." Id.

My religious beliefs prevent me from gathering enough money to pay people to help me collect signatures and pay filing fees. I will not collect fees from individuals or lobbyists as this violates my religious beliefs against partiality and favoritism, serving those who serve me, thereby serving myself, by potential invisible strings attached to such donations.

The caveat is, I would be willing to accept donations from the democrat party as they cannot buy me or influence me since I am already a Democrat. I am a Democrat because they love people, not money. Democrats tend to serve people, not greed. I believe people go to hell for seeking money in place of God. (See Matthew 6:24, and Luke 16:13, "You cannot serve God and money."). (See, Luke 19:45-48, Malichi 3:1-3, Matthew 21:12-13, Mark 11:15-19, John 2:13-17, Jesus chased people out of the temple for stealing the real treasure, people's eternal lives), (See, Matthew 23:15, Jesus told the leaders they were making their followers twice as worthy of hell as they were since the leaders taught them to focus on money instead of God.) I would be a misleader, not a leader, if I taught people to serve greed instead of teaching them to care for one another since I believe serving greed leads many to hell. (See, Acts 8:20, "Peter answered: 'May your money perish with you, because you thought you could buy the gift of God with money!"). People are more valuable than money. God commands us to love people not money. In John 13:34, Jesus said "A new command I give you: Love one another. As I

have loved you, so you must love one another."

I am a leader because I think for myself after analyzing facts and laws. I will seek to do what is in the best interest of the American people, not what immediately pleases

some of their immediate desires only to harm them down the line. That is wrong. I take responsibility for my decisions made on behalf of others, and I will not be influenced by money or support. I do not believe the Democratic parties in each state will support me though I support their love for people and the environment over profit. I am against two positions the party heads seem to support. ²

² Some Democratic leaders support abortion and death with dignity acts. I do not encourage or support abortion and the death with dignity acts. I believe they harm people, or potential people not only here, but in eternity too. I would be a bad leader if I led people I served to harm people or themselves for mere temporary ease, comfort or profit. I am against abortion. I do not believe they go to heaven. I believe they were robbed of the opportunity to be born of flesh and born of spirit. (See John Chapter 3:3-8, "Jesus replied, Very truly I tell you, no one can see the kingdom of God unless they are born again. ... Jesus answered, Very truly I tell you, no one can enter the kingdom of God unless they are born of water and the Spirit. Flesh gives birth to flesh, but the Spirit gives birth to spirit..."). Accordingly, the potential people not only lost life in this life, they lost eternal life too.

I am also against the Death with Dignity Acts. Many people may make mistakes, even professionals and experts such as doctors and health care professionals. None of us are gods. They may misunderstand or may lie for money or convenience. So great injustice may result. Ignorance or error will not reverse the harm done.

Further, I believe people may go to hell for killing themselves. It is not loving to encourage those you serve to die and go to hell out of convenience, comfort, martyrdom for the temporary convenience for themselves or other people, or to save money. People are more valuable than money, things or comfort. There are two examples of people who killed themselves and went to hell in the bible. King Saul in the Old Testament, and Judas Iscariot.

Pursuant to 1 Samuel 31:4, "...Saul took his sword and fell on it." Saul killed himself. In 1 Chronicles 10:13 provides, "Saul died because he was unfaithful to the LORD; he did not keep the word of the LORD..." I do not believe he went to heaven because of these words.

The other example is Judas Iscariot. In Matthew 27:1-10, Judas said sorry, confessed his sin, gave the 30 shekles back. Unfortunately he gave into despair instead of repenting by faith and trust in God's love and mercy. He killed himself instead of living to love God and love those God loves, everybody even our enemies.

In John 17:12, Jesus says, "he was doomed to destruction." So, I do not believe Judas escaped Satan's goal damnation.

I believe we live or die for God. Citing, Romans 14:8. Those who live and die for self or for mere people instead of God do not go to heaven. I believe Jesus was not kidding when he said you who love mother and father more than me are not worthy of me. You who love son and daughter more than me are not worthy of me are not worthy of me. Citing, Matthew 10:37. I believe Jesus was not kidding when he said unless your "righteousness exceeds that of the scribes you will" not go to heaven. Matthew 5:20. How? Through the righteousness of Abraham. Abraham believed what God said. His belief was attributed to righteousness. Citing, Genesis 15:6. Abraham listened to God to the point he was willing to sacrifice his own son. This righteousness was attributed to Lot when he listened to God's word. He did not even turn around when his wife turned into a pile of salt. See, Genesis 19:26. Thus, we should obey the greatest command to love God and love others. Love does not encourage harm in this life and eternal life for mere material convenience. ⁴ See, Romans 13:10.

My beliefs are genuine. I ran for local office and espoused the same beliefs on collecting donations and fundraising. (Please see Exhibits, 1, 2, 3, 4).

My faith in Christ is genuine. I confronted the Delaware Supreme Court when they violated my religious rights to affirm instead of swear into the Delaware Bar. (See Exhibit, 5).

I twice rejected appointments to family law matters as violating my religious beliefs (See Exhibits 6, 7).

I confronted the Courts in Delaware per the attached letter concerning impartiality and bias. (See Exhibit 8); (Also see, Leviticus 19:15 "You must not pervert justice; you must not show partiality to the poor or favoritism to the rich; you are to judge your neighbor fairly"); (see, Exodus 23:6, "You shall not deny justice to the poor in their lawsuits."); (see, Deuteronomy 16:19, "Do not deny justice or show partiality"); (also see, Deuteronomy 1:17, "Show no partiality in judging; hear both small and great alike. Do not be intimidated by anyone, for judgment belongs to God. And bring to me any case too difficult for you, and I will hear it.").

I am against the Death with Dignity Acts because I believe the most important time of our lives is at the end pursuant to the Bible. In Ecclesiastes 7:1, "the day of death better than the day of birth." In Ezekiel, the Bible says if you do good all of your life and turn away from the good, none of the good will be remembered. In Ezekiel, it says if you do evil all of your life and turn away from the evil, none of the evil will be remembered. (See, Ezekiel 18:21-24, Also see Ezekiel 33:12-16). Further, in the Parable of the Sower in Matthew Chapter 13, only those who understood and kept the truth in the end were saved from hell. Also in Matthew 24: 13, we learn that only those "who stand firm in the end" will be saved.

On an aside, I believe non Christians may go to heaven (or hell) through Jesus on that last day. See, Hebrews Chapter 11. Also see many verses about the new covenant written on our hearts. When I think of tribes in unreachable parts of the land I think of Romans 2:15. "They show that the requirements of the law are written on their hearts, their consciences also bearing witness, and their thoughts sometimes accusing them and at other times even defending them." See also, Jeremiah 17:1, Nehemiah 7:5, Ezekiel 36:26 relating to God's law or God written in our heart..

I understand with the acceptance of the cloak of government power I will lose some of my power to speak on my personal religious beliefs in order to uphold the freedoms of those I serve and prevent a chilling effect.

I even shared my view on what using the name of God in vain means when I proposed a suggestion to Senator Tom Carper of Delaware. (See, Exhibit 9). I believe it means using the name of God, or religion or scripture for man's purpose instead of a true religious purpose.

I believe it would be wrong to collect donations from those outside of the Democratic party such as lobbyists and people as it would create the appearance of influence and favoritism in violation of the bible's teachings as we are called to serve everyone's best interests, not merely those who support us, or pay us with lobbyists money. That is a sin against God. (See, James 2:; "do not show favoritism."); (James 2:9, "But if you show favoritism, you sin and are convicted by the law as transgressors."); (Deuteronomy 16:19, "Do not deny justice or show partiality. Do not accept any bribes, for a bribe blinds the eyes of the wise and twists the words of the righteous."); (Proverbs 18:5, "Showing partiality to the wicked is not good, nor is depriving the innocent of justice."); (Proverbs 24:23, "These also are sayings of the wise: To show partiality in judgment is not good."); (Malachi 2:9, "So I in turn have made you despised and humiliated before all the people, because you have not kept My ways, but have shown partiality in matters of the law."); (Job 34:19, "who shows no partiality to princes and does not favor the rich over the poor, for they are all the work of his hands?"); (Job 13:10, "Surely He would rebuke you if you secretly showed partiality.").

Accepting donations from lobbyists and individuals creates an expectation of a return in violation of God's instructions. In Romans 13:8 the Bible teaches: "Owe nothing to anyone except for your obligation to love one another..." The acceptance of

money from individuals and lobbyists creates an appearance that I am bought. That violates the bibles teachings on impartiality.

I believe it would be wrong to pay a team to support me by gathering signatures in various states. I would be buying votes, by buying support. That is wrong. Votes should not be bought. I should not earn support with money. I should try to gain support with true leadership, love for others, by service to others by presenting my plans to take care of Americans relating to healthcare, social security, and the environment.

On an aside, to alleviate your fears, I understand there are not only checks and balances within the three branches of government, there are also internal checks and balances within each of the individual branches. With the acceptance of the cloak of government authority, I understand my rights will be more limited in order to uphold those I hope to serve. My rights to speak out on my faith will be more limited in order to uphold the religious freedoms of the American people should I be elected. Americans should worship or not according to the dictates of their own conscience, not the dictates of the government. I will treat everyone with respect regardless of religion, race, gender or place of origin. I am not scared to love those outside of my own. I am commanded to.

Since, I do not wish to violate the Bible's teachings on impartiality, I respectfully, request that each state's filing fees and signature requirements be waived.³

³ See, *Fraternal Order of Police Newark Lodge No. 12 v. City of Newark*, 170 F.3d 359 (3d Cir. 1999) "... denial of religious exemption to no-beard requirement violated free exercise clause."

Also see, *Black Hawk v. Pennsylvania*, 225 F. Supp. 2d 465 (M.D. Pa. 2002), *aff'd sub nom. Blackhawk v. Pennsylvania*, 381 F.3d 202 (3d Cir. 2004). (By anaylsis of this case, I am required to prove that my free exercise of religion has been substantially burdened. U.S.C.A. Const.Amend. 1. I have met such burden).

See, *Military Selective Service Act of 1967*, § 6(j), 50 U.S.C.A. § 456(j); U.S.C.A.Const. art. 1, § 8, and *Gillette v. United States*, 401 U.S. 437, 91 S. Ct. 828, 28 L. Ed. 2d 168 (1971); *Welsh v. United States*, 398 U.S. 333, 90 S. Ct. 1792, 26 L. Ed. 2d 308 (1970), (In these cases, the Plaintiffs claimed a religious exeption for a belief that was unpopular by many well connected, powerful and wealthy people of their time. My beliefs concerning abortion and the death with dignity acts are unpopular by many democrats. Yet, I am a life long democrat and support their love for people instead of love and exploitation and harm to people to

In addition to and in the alternative of, I also seek a waiver since I currently can not afford to pay the filing fee, and can not afford to pay for travel and expenses to collect signatures.⁴ It against my religious belief to ask others to volunteer to do it on my behalf.⁵

serve pockets, despite the fact many within my party oppose these two views. I will gain votes by non party members for my honesty.

⁴ *Lubin v. Panish*, 415 U.S. 709, 94 S. Ct. 1315, 39 L. Ed. 2d 702 (1974); (Process of qualifying candidates for a place on the ballot may not constitutionally be measured solely in dollars. U.S.C.A.Const. Amends. 1, 14, 25, 26; Voting Rights Act of 1965, § 2, 42 U.S.C.A. § 1973"); *Id.* ("Legitimate state interest of maintaining integrity of elections must be achieved by a means that does not unfairly or unnecessarily burden either a minority party's or an individual candidate's equally important interest in continued availability of political opportunity. U.S.C.A.Const. Amends. 1, 14, 25, 26; Voting Rights Act of 1965, § 2, 42 U.S.C.A. § 1973.");

Distinguish (Cassidy v. Willis, 323 A.2d 598 (Del.), *aff'd*, 419 U.S. 1042, 95 S. Ct. 613, 42 L. Ed. 2d 636 (1974), The Court held, Statutes providing for filing fees for candidates in primary elections, as applied to potential candidates who were financially able but unwilling to pay fees in question, were not invalid under equal protection clause of the Fourteenth Amendment. 15 Del.C. §§ 3104, 3107; U.S.C.A.Const. Amend. 14." I can not afford to pay the filing fee and desire to run as soon as possible to ensure a fighting chance).

⁵ Asking for volunteers is a sin against God. It violates Jesus Christ's teachings in Matthew 6. I am a Christian. I believe Jesus Christ. In Matthew Chapter 6 Jesus says "Do not give charity seen." Give in secret, not knowing your left hand from your right. Meaning do not give out of one hand (donate time or money, or favors or such), to get out of the other, (for jobs, to be seen, cheap marketing, favors, good deeds).

I believe donations seen wrongly teaches conditional giving is unconditional love, glorifying the punishment as the reason to live, business and family instead of unconditionally respecting, loving God and others, even those who do not benefit you, including your enemy.

I also believe that charity wrongly teaches giving money, or volunteering seen is good. So, people wrongly learn those who do not contribute money can not be good. This leads some people to call poor people bad people. Instead of loving the poor, people learn to condemn them. That is wrong. I do not want to mislead people. I desire to lead people by serving them in truth with love.

On an aside I believe the punishment "tilling in the soil" and "desire for your husband," even though they are hairy and fart, (we really do desire them), and child birth is for edification. It teaches us to care about others, albeit conditionally. We learn by baby steps before taking leaps in learning to love unconditionally by respecting the dignity of all people regardless of race, religion or place of origin. The purpose of the punishment is a bit loving like a father placing a child in a time out when they run into the road. The punishment is teaching out of love for the child, to prevent loss of life and eternal life.

I believe the reason we exist is because God loves us, all people regardless of race, religion or place of origin. "We love because he first loved us" 1 John. 4:19. Sadly some glorify the fruits of the punishment, money and the things it can buy or imperfect people who let us down or die, when the purpose is glorious, love. The punishment is merely part of life, not the main purpose.

Those who respect money instead of people have not accepted love, (God), in their hearts. Scripture teaches "God is love." 1 John 4:8 and 16. Instead of love, the have emptiness in their hearts. Love them anyways, in hopes they can be filled by your love. Love does not encourage harm ion this life or the next by false assurance.

I made up a mnemonic Accept it. Reflect it. Don't suck it like Satan. Meaning do not suck light (truth in

Further, in addition to and in the alternative of, I have severe allergies that prevent me from obtaining signatures by going outside without the threat of illness.⁶

love), life and love from the world. This causes death, damnation and serves the one "who has power over death, the devil." Hebrews 2:14. Yet so long as we have life, we can turn away from such empty lives and be saved.

The power of the legislative pen, is the power to save souls or mislead them to hell. It allows leaders to teach those they serve to care about other people, because God loves other people too, or get corrected in Court or by affecting what they care about money in hopes to warm cold empty hearts with eternal life saving love. I think of these laws as just laws. Unjust laws teach people wrong. See, Isaiah 5:20, "Woe to those who call evil good and good evil, who put darkness for light and light for darkness, who put bitter for sweet and sweet for bitter.") Unjust laws mislead people to harm and hell. See, Isaiah 10:1, "Woe to those who make unjust laws, to those who issue oppressive decrees,") They glorify money and business and teach people to exploit and harm one another causing not only economic harm but harm to lives and health. Unjust laws glorify the wrong doers as they exploit and harm the masses for profit. Yet, the masses praise them since they give charity seen, sinning against God. The masses praise them since the deep pocketed wrong doers buy the politicians who train us to praise those who help them in elections. Throughout the history or law and politics, wrong doers are praised. See, Habakkuk 1:4 ("Therefore the law is paralyzed, and justice never prevails. The wicked hem in the righteous, so that justice is perverted."); also see, Amos 5:7 (There are those who turn justice into bitterness and cast righteousness to the ground.). Then when light is shed on the harm they caused, they plead ignorance. Yet, ignorance is not innocence in this life or the next. See Ephesians 4:18, ("They are darkened in their understanding and separated from the life of God because of the ignorance that is in them due to the hardening of their hearts."), Proverbs 8:33, also see Romans 10:3 ("For they being ignorant of God's righteousness, and seeking to establish their own righteousness, have not submitted to the righteousness of God."), Hebrews 2:3 ("how shall we escape if we ignore so great a salvation?"), 1 Timothy 1:19, (" with faith and a good conscience. By ignoring their consciences, some people have destroyed their faith like a wrecked ship."), Matthew 13 (Only those who understood were fruitful/meaning lived (eternal life)). Wealthy men often choose to ignore foreseeable harm because they choose not to care, to be inconvenienced, to compromise their profit. I choose to care. I will not sell my soul for the dollars needed to get on the ballot. Please allow me to combat the foreseeable harm by drafting just laws, and if needed continuing drafting articles of impeachment, should the need remain if President Trump is reelected. I drafted 4 and suggested 5 to all 541 of our congress people. I love you, and I love people. Thank you. See, Amos 5:24 ("But let justice roll on like a river, righteousness like a never-failing stream!") (Note, MLK cited this).

See, *Masterpiece Cakeshop, Ltd. v. Colorado Civil Rights Comm'n*, 138 S. Ct. 1719, 201 L. Ed. 2d 35 (2018) ("The Free Exercise Clause bars even subtle departures from neutrality on matters of religion. U.S.C.A. Const.Amend. 1."); ("The First Amendment ensures that religious organizations and persons are given proper protection as they seek to teach the principles that are so fulfilling and so central to their lives and faiths. U.S.C.A. Const.Amend. 1."); *Id.* ("The Constitution commits government itself to religious tolerance, and upon even slight suspicion that proposals for state intervention stem from animosity to religion or distrust of its practices, all officials must pause to remember their own high duty to the Constitution and to the rights it secures. U.S.C.A. Const.Amend. 1"); Also see, *McDaniel v. Paty*, 435 U.S. 618, 98 S. Ct. 1322, 55 L. Ed. 2d 593 (1978) (This case is distinguished because the statute is discriminatory on its face, instead of as applied. Yet, I like the beautiful language and would probably cut and paste the Courts wise analysis to teach respect for people under the law who think differently, even people like me.).

⁶ *Graveline v. Johnson*, 336 F. Supp. 3d 801 (E.D. Mich. 2018) (Michigan ballot access statutes, requiring independent candidates to collect 30,000 signatures, were unconstitutional as applied.).

To appease your concerns, I know my freedom to speak will be reduced should I be elected. I will live my faith by loving others. I will safeguard separation of church and state.

Thank you for your time and consideration.

Very truly,

/s/Meghan M. Kelly
Meghan Kelly, Esquire
DE Bar Number 4968

EXHIBIT

51

Receipt of Responses

Dear Meghan M Kelly,

Thank you for responding to our 2018 Voter Guide questionnaire. The League of Women Voters of Delaware appreciates your participation! Informed voters are the backbone of our democratic republic. . For your records, here is a copy of your responses:

Education

Meghan Kelly, Esq. attended Lord Baltimore Elementary, Selbyville Middle, and Indian River High School where she participated in Girls State, National Honor Society, Cheer leading, Drama Club, Band, Soccer, and Field hockey. Meghan received her Bachelor's Degree from the University of Delaware, and her JD from Duquesne School of Law. While in law school, she interned with the Honorable Justice Thomas Hardiman, nominee for US Supreme Court, and current Third Court of Appeals Justice.

Work Experience

I reviewed proposed changes of laws for over a decade, starting in 2008 at the law firm, Richards, Layton & Finger, and discovered a desire to amend laws to better serve the people in the community I grew up in and love. I desire to draft laws that actually work, that are enforceable, that make a difference. I will combat corruption, abuse and misuse of funds and resources to protect those I hope to serve, the people, not our own backs. I gained expertise working for several firms in Delaware. I have experience representing clients in hearings and mediations, as well as in corporate law, bankruptcy, personal injury, wills and estates, real estate transactions, and general litigation. I am also licensed to teach, and worked for the Indian River School and Cape Henlopen School Districts. I have worked throughout the Delaware beaches in my youth, from age 14 on, and I am delighted for the opportunity to serve the people in the community I grew up in and love as a legislator. Thank you.

Community Involvement

With regards to community involvement during the election, I received permission from Bethany to informally meet with people at the Bethany Beach Board walk, every 3rd Sat. at 5:00 PM to "walk and talk" with people. I also intend to keep knocking on doors in hopes to hear what is important to folks in the community. I look forward to hopefully seeing you at the walk and talks and other free events in the community. Nevertheless, I am cognizant that it is impossible to talk with each voter before the election. So, I have also drafted Guest Columns in the Coastal Point, a local newspaper. The Editor kindly prints my columns from time to time. I welcome comments both negative and positive as I prefer to know where I fall short so I may improve. One reason why I choose not to fund raise, though I am not wealthy like my millionaire opponent who started off with over \$28K in donations, is because I want you to know your vote cannot be bought. You cannot be bought. People are priceless.

Email Address

electmegkelly@icloud.com

Website

Phone

(302) 537-1089

Address

34012 Shawnee Drive

Age

Additional Information

With regards to campaign finance, I choose to be part of the solution, not part of the problem. I am not going to accept monetary donations during my campaign to prevent the appearance of undue influence or favoritism, except by the Democrat party. (They cannot buy me. I am already theirs. I am a lifelong Democrat.) Nor am I going to give monetary donations, or attend events that require fees as that may make the appearance of buying votes. So, I intend to attend free events that will not cost attendees or me any money. My platform includes: 1. Infrastructure, 2. the Environment, 3. Clean Water, and 4. Healthcare, but I intend to do so much more to help people. I will uphold Delawareans' freedom and fair application of the laws regardless of race, religion, age, wealth or poverty. Every citizen is important and valuable to our community. I will focus on serving people, and preventing abuse and corruption by those who seek to take advantage of Delawareans for profit or gain.

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Twitter Page

What issue do you feel has the greatest impact on Delaware's economy today? Please describe why it is important and what needs to be done.

The negative consequences of deregulation and the defunding of the federal government that will impact Delawareans down the road is the greatest issue legislators must address, and not hide from. We need to prepare for what is ahead, a short fall of expected federal funds, which will lead to a short fall of state and local funds. Deregulation sounds great until you realize you must increase local taxes to pay for things or go without. The Federal government gives money to Delaware, in part, under its authority under Article I Section 8 of the Constitution, the Spending Clause. Delaware receives money with strings attached, called regulations. If Delaware doesn't adhere to the regulations, we do not receive money. As the federal government deregulates, it will continue to defund programs in Delaware. That means state and local governments must pay for more or go without. We must also prepare for the removal of environmental laws by the Federal Government to prevent harm.

Please describe what, if anything, Delaware should do to reduce gun violence in the state.

We need to address and prevent the underlying conditions that lead to gun violence: poverty, bias, prejudice, fear, greed, violence, and desperation, with correction not condemnation. When you condemn people as opposed to the bad choice, you instill fear, creating an incentive for folks to hide their evil instead of bringing it to light to be corrected. We live in unstable times. Many of my neighbors fear the overthrow of the foundation of the government, the Constitution. As I have knocked on doors, many discussed the potential repeal of the second amendment as the first step towards the repeal of the entire Constitution. I am not for repeal, just limits. All constitutional rights have limits in order to uphold the rights of others. We can place limits on the sale and distribution of guns to ensure guns do not get in the hands of those who wish to kill, steal and destroy.

How would you work to address the state's long-term budget challenges? What specific changes in revenue sources or spending do you support? Please explain.

I support state spending for beach replenishment, roads, and schools. I would like to avoid an increase in local taxes to prevent foreclosures. We must perform due diligence before granting funds to businesses to avoid bad investments. Stop focusing on businesses that keep folks in poverty and on welfare, and start focusing on businesses that take care of employees, not take advantage of them. Should any money be granted to a business, require they pay every dime back should they pull out of Delaware. Otherwise, they will take free money and leave when the money stops. I am open to discussions on how we can help our current available work force to thrive instead of merely survive. Too many talented, smart, hard working people are taking on multiple jobs to make ends meet. Others work 3 to 5 months during the summer season in our resort town. Then they rely on unemployment and welfare. With federal cuts, this may no longer be an option. Crime to survive is not an option either.

What actions, if any, should the state legislature take to improve water quality in Delaware? Would you support additional funding for clean water projects through a surcharge on state income tax? No Position

If no, what other funding mechanisms would you suggest?

Throwing money at problems does not solve them. It creates an incentive not to solve them, the desire for more money, greed. That said, I am not opposed to creating additional tax brackets. I intend to draft and amend laws to make the wrong doer, not the tax payer, clean up the pollution. Make it easier for an attorney to convert bad behavior by removing certain obstacles within the statutes, eliminate defenses, expand standing to additional plaintiffs, require monetary and specific performance, talk to the environmental section of the bar and work to create a legislative solution to alleviate this problem. My opponent Representative Ronald Gray co-sponsored House Bill 100, legislation that removes the ban on the construction of new heavy industry in coastal areas. We need to draft laws to make polluting entities clean up their current messes before we may unknowingly create additional threats to human life and health by encouraging the construction of additional plants.

Do you support state funding for a new voting system? (Y/N) If so, what criteria should be used to select the system?
I have not made a determination on this issue. I prefer the paper ballots since there is less security risk.

Manufactured housing policy is currently regulated by multiple agencies including the Department of Motor Vehicles, Attorney General's Office, Delaware Manufactured Homeowners Relocation Authority, and the state legislature. Would you support a dedicated Office of Manufactured Housing? No Position

Please explain:

It depends on whether safeguards remain to protect the mobile home owners. We should protect the Delawareans we serve more than profit. People are more valuable than money. We are number two in foreclosures in the country. It is of utmost importance that we do not push folks out of their homes merely to make more money. On a side note, I have been concerned about my opponent, Mr. Ronald Gray's sale (as part owner) of Shady Park, a trailer park including over 300 families for millions of dollars when he is already wealthy. Conveniently, there is no danger of this property being converted to a factory or condos (increasing congestion) before the election, as the process takes about a year and is quite time consuming. Nevertheless, did his participation in the decision potentially jeopardize many families' homes in the future, 5 to 10 years from now? I hope not. Nevertheless, I writing about this early in an attempt to discourage redevelopment Shady Park. Serve people, not greed.

Do you favor legalizing marijuana for non-medical personal use in Delaware? No Position

Please explain:

I have made no determination on this issue. I have never tried marijuana, and never plan to. This is not a priority for me at this time. I see the benefits of legalization to free up the police. This offense is less serious towards the public than violence or more dangerous drugs offenses. If legalized, mandatory expungement of past criminal records is required, unless it relates to vehicular offenses. On the other hand, I am concerned about the government using people for money regardless of potential harm, and I am concerned about modeling bad leadership. When drugs are lawful, people may think they are encouraged. I do not want to encourage folks to give into the temptation of smoking pot all the time. We all know so called "pot heads" who have not been able to get ahead. I do not want to encourage folks to harm themselves, and get stuck. Nevertheless, I do not think this drug is as harmful as many alleged medicines. Why are law makers less concerned about harmful prescriptions?

Please contact vote411LWDE@gmail.com or (302) 650-6697 for questions.

Sincerely,

Kim Wells
2018 Delaware VOTE411 Coordinator

This message was sent to electmwells@icloud.com from **Voter Guide Toolkit** on behalf of **lwvde12 Voter Guide**. If you would not like to receive any further messages from Voter Guide Toolkit, [click here](#). To ensure that you receive important messages from Voter Guide Toolkit, please add messages-c2@thevoterguide.org to your address book.

On Tue, Oct 23, 2018 at 8:02 PM Meghan Kelly <electmegkelly@icloud.com> wrote:
Hi Danielle,

Thank you for posting it so quickly. I saw some more typos and revised it yet again.

I'm sorry.

Thank you for helping me. Have a great night.

Very truly,
Meg

Second ballotpedia

What would be your top three priorities, if elected?

1. Preserving the Environment:

I intend to draft and amend laws to make the wrong doer, not the tax payer, clean up the pollution. Make it easier for an attorney to correct bad behavior by removing certain obstacles within the statutes, eliminate defenses, expand standing to additional plaintiffs, require monetary and specific performance, talk to the environmental section of the bar and work to create a legislative solution to alleviate this problem.

My opponent Representative Ronald Gray co-sponsored amendments to House Bill 190, legislation that removes the ban on the construction of new heavy industry in coastal areas. We must draft laws to make polluting entities clean up their current messes before we may unknowingly create additional threats to human life and health by encouraging the construction of additional plants.

2. Seek Improvements on Infrastructure:

I intend to seek a greater amount of money from the state of Delaware to improve our roads, schools and to maintain our beaches from the state in hopes not to increase local taxes. Many of my neighbors are land rich, but wage poor. They simply cannot afford an increase in local taxes as that may push them out of their homes.

Delaware is number two in the country for foreclosures. I choose to alleviate the foreclosure crisis, not exacerbate it.

I also intend to seek ways to slow down the building boom to decrease the congestion problem. Our infrastructure cannot sustain the current population. We must improve, maintain and preserve our infrastructure before building it up more. We need to create an atmosphere of success not failure.

3. Improve Health Care:

Please refer to the article I drafted in the Coastal Point, called Representative candidate says health is wealth, dated July 20, 2018, which outlines my proposals to improve the quality of health care. I studied the history of health care at University of Delaware, and health care law and health care finance at law school. So, I also proposed laws to federal legislators that would reduce the cost of health care without eliminating the quality or quantity of care. .

What areas of public policy are you personally passionate about?

With regards to campaign finance, I choose to be part of the solution, not part of the problem. I am not going to accept monetary donations during my campaign to prevent the appearance of undue influence or favoritism, except by the Democrat party. (They cannot buy me. I am already theirs. I am a lifelong Democrat.) Nor am I going to give monetary donations, or attend events that require fees as that may create the appearance of buying votes. So, I intend to attend free events that will not cost attendees or me any money. My platform includes: 1. Infrastructure, 2. the Environment, 3. Clean Water, and 4. Healthcare, but I intend to do so much more to help people. I will uphold Delawareans' freedom and fair application of the laws regardless of race, religion, age, wealth or poverty. Every citizen is important and valuable to our community.

My Goal is to:

- * Amend and draft laws that better serve Delawareans
- * Focus on serving people, and preventing abuse and corruption by those who seek to take advantage of Delawareans for profit or gain
- * Work on solving problems while holding individuals and businesses receiving funds personally accountable for loss and self dealing
- * Uphold Delawareans' freedom and fair application of laws regardless of race, religion, gender, wealth or poverty. Every citizen is important and valuable to our community.

I am a supporter of education at all ages. We are all learners and teachers. Every citizen at every age is valuable, and is worthy of opportunity. A student's worth does not diminish when schooling ends, and Delawareans do not necessarily need to go into debt in order to gain employment. Nevertheless, they do need to have a valuable skill. We should encourage people of all ages to invest in themselves throughout their lives, not merely when they are young.

I am open to discussions on how we can help our current available work force to thrive instead of merely survive. Too many talented, smart, hard working people are taking on multiple jobs to make ends meet. Others work three to five months during the summer season, in our resort town. Then they rely on unemployment and welfare to get by. With federal cuts, this may no longer be an option. Crime to survive is not an option either.

I do not have the answers in this area. Nevertheless, I am open to discussions. I will need your help to create better paying opportunities in Sussex County that will lift our neighbors out of poverty and prevent them from turning towards crime.

Who do you look up to? Whose example would you like to follow and why?

My father, the legendary Coach, Pat Kelly is my hero. He was a beloved basketball coach and Civics and United States History teacher at Indian River High School for about 20 years. My dad is and continues to be a positive role model for not only students and his family, but to the world too. He lifted black students up through basketball at my former high school, a football school where prejudice sadly remains. My father used to stay late and tutor students after school. He used his own money to buy them shoes. My mom visited their loved ones at prisons. My dad looked for scholarships and helped seek opportunities for students to lift them out of poverty. My dad loved those kids, and continues to stay in touch with many, decades later. He is always available to offer encouragement and hope. Unfortunately, my father left ten years ago to teach and coach high school basketball in Florida. So, his impact has weakened in Sussex County, Delaware.

In 2016, students at Indian River High School gave black students bracelets with the Nazi symbol that allegedly said "kill yourself" in response to the Black lives matter bracelets. That was awful.

My father is my hero because he chooses to do what is right even if he is the only one who has the courage to do so. I choose to do the same by standing up when others remain down out of fear, for speaking up when others choose not to be inconvenienced, for choosing to do what is right even if it costs me everything.

My dad lives the life he desires others to emulate by respecting and honoring all people regardless of their wealth or poverty, race, diverse religion, place of origin, age or unique beliefs. He truly lives a life of love and encouragement. I hope to do half the good he has done. My father, Pat Kelly, also life guarded at the Delaware beaches, and taught Sunday School at Saint Anne's Located at Bethany Beach.

He also has the best dance moves in our family. He made living a life of love look cool and is the hero of many beyond his own. Thank you Dad. I love you.

Is there a book, essay, film, or something else that best describes your political philosophy?

The Bible. I try to live by it by:

- Serving people, not taking advantage of them for gain. "The greatest among you is your servant." Matthew 23:11. Not servant of those who serve you thereby serving yourself.
- having faith instead of fear,
- .-loving instead of remaining indifferent or hating,
- instilling hope instead of bitterness, or despair,
- using the laws of the courts to correct people, not to condemn them,
- instilling mercy and teaching opportunities, not condemnation,
- building up not tearing down,

- serving people, not serving greed,
- loving people, not loving power, not loving money,
- love not evil. I define evil as absence of love for those beyond your own,
- seeking solutions to alleviate challenges instead of seeking someone or something to blame,
- building up, not to tearing down,
- remaining humble and grateful instead of glorifying self or mere man,
- Lead in truth, not in deception. Be a leader not a misleader,
- remaining impartial and fair. Do not serve merely those who serve you. That is wrong.

What Characteristics or principles are most important for an elected official?

"The greatest among you is your servant." 23:11. I hope to model good leadership by serving people, not serving greed. I hope to teach people they are priceless, not a price tag. People are more valuable than money. I hope to teach people to encourage one another by building each other up instead of shaming each other and tearing each other down. I hope to teach people to respect others while respectfully disagreeing. I hope to teach people to attack problems, not create more problems by attacking people. I hope to serve people well.

What qualities do you possess that would make you a successful officeholder.

I have been licensed to practice law for more than ten years in this state. I have reviewed proposed laws periodically starting in 2006 at Richards, Layton and Finger, and throughout the years since, and I have discovered a strong desire to draft and amend laws to better serve Delawareans.

So, I found myself filing to run for office in hopes I could improve the lives of people in the community I grew up in and love.

I desire to draft laws that actually work, that are enforceable, and that make a difference. I will combat corruption, abuse and misuse of funds and resources to protect those I hope to serve, the people, not our own backs. I gained expertise working for several firms in Delaware. I have experience representing clients in hearings and mediations, as well as in corporate law, bankruptcy, personal injury, wills and estates, real estate transactions, and general litigation. I am also licensed to teach, and worked for the Indian River School and Cape Henlopen School Districts. I have worked throughout the Delaware beaches in my youth, from age 14 on, and I am delighted for the opportunity to serve the people in the community I grew up in and love as a legislator.

What do you believe are the core responsibilities for someone elected to this office?

- * Amend and draft laws that better serve Delawareans.

*** Focus on serving people, and preventing abuse and corruption by those who seek to take advantage of Delawareans for profit or gain.**

*** Work on solving problems while holding individuals and businesses receiving funds personally accountable for loss and self dealing**

*** Uphold Delawareans' freedoms and fair application of the laws regardless of race, religion, gender, age, wealth or poverty. Every citizen is important and valuable to our community.**

*** Listening and looking into the needs of those I hope to serve. Preparing them for challenges ahead without giving empty promises.**

What legacy would you like to leave?

I hope to draft laws that will improve the lives of those I hope to serve well beyond my life time.

I also hope to teach people the following:

- **What makes America great is the people. Without the people this country is just a bunch of land. What makes America great is Americans' universal respect for the freedoms of speech, assembly, religion or place of origin.**
- **Serve people, Not Greed.**
- **People are Priceless, Not a Price Tag.**
- **Invest in yourself. You are worth it. People are priceless.**
- **No one is above the law. No one is below the law.**
- **Violence is the problem, not the solution.**
- **Use Words Not weapons. Words become Ideas. Ideas become beliefs. People cling more tightly to beliefs than money. Words are powerful.**
- **Greed is the evil seed that blooms into hate.**

Businessmen give business to those who give business to them. Their kids take over their businesses and send business to each other. So, the tradition continues.

When alleged outsiders, (from desegregation, the women's right movement, and immigrants), started to compete for the same business, businessmen began to fear losing money.

So they misbehaved by name calling, bias, prejudice, black balling and worse. Be courageous, respect, not cowardly by hate.

- Do not make jokes based on race, religion, gender or nationality. When they go beyond a joke, it is no laughing matter.
- There is no Delaware way. There is an American way where we respect all people regardless of race, religion or place of origin (even Pennsylvania).
- Women are Someone to respect. They are not Something to look at, use, or do. Women are people not things.
- Do not laugh at jokes that sexualize women. They are not funny. When they go beyond a joke, it is no laughing matter.
- Confront to correct, not to condemn, or let it slide off your back whichever is more loving.
- Attack problems, not people. Attacking problems solve them. Attacking people creates more problems.
- Courts are for correction, not condemnation.
- Pride is ugly. Putting others down, while saying you are better than is ugly. Respect, now that is beautiful. Building others up, without tearing others apart. Praising someone, without putting others down.
- Serve People not Money. Serve People, not People's desire for security in money (otherwise known as Greed). Love People, not Money.

What is the first historical event that happened in your lifetime that you remember? How old were you at that time?

With regards to the first historical event in my history, in Middle School, I ran for office and won. I remember Jennifer Hickman was my campaign manager. She played Bon Jovi's song about signs as I walked down to speak. Later, in 10th grade, I was nominated to Girl's State where I was elected to be the Speaker of the House during a mock legislative race. I remember in my speech I chose not to bore people on all the credentials and activities I participated in. Instead, I said I would serve them well by speaking well, and I won.

I have a fire in my belly to act and participate in drafting laws, not merely comment on the side. This is part of the history that led me to file to run for the House of Representatives in the 38th District.

What was your very first job? How long did you have it?

I think I baby sat before I was 14. When I was 14, I worked at a grocery store in Bethany Beach. I don't remember the time frame or how long I worked.

What happened on your most awkward date?

When I was young, I played on the boys' soccer team at Indian River High School, with the Democratic candidate for Treasurer for the State of Delaware, Colleen Davies.

At the end of the season Coach Dunkin Smith gave me toothpaste and a tooth brush as a gag gift since it looked like a smile when I accidentally hurt boys on the soccer field.

Kris McClure, the cutest guy in high school, received a heart because he had me for a girl friend for a limited time. Kris was so sweet. He invited me to the movies at Clayton on a Sunday night, but I was so late. I fear an hour late because I went to church and Sunday school. It was CCD Sunday school night after all. He patiently waited for me outside of the movie theatre the entire time

That was the worst date ever, but it was my fault. I am sorry Kris.

It is a good thing we broke up because his political values, his heart is different than mine. I serve people, not greed, not my own sinful desires. He appears to be on the other side of the political aisle, 20 years later.

Regardless, thank you for being a gentleman when we were children. You showed me honor and respect on all other dates too. I pray your heart turns away from the misleadership of President Trump. You know my heart. I have not changed. I am like my father. I like who I am, who I choose to be. I am not ashamed because I try not to give into temptation by serving sins. I don't want to mislead people into thinking evil is good.

What is your favorite holiday? Why?

Christmas, because I love to focus on God's love, mercy and salvation extended to the gentiles like me, through the birth of Jesus Christ.

What is your favorite book? Why?

The Bible. I live by the Word of God.

If you could choose to be any fictional character, who would you be?

No one. I choose to be me.

What is your favorite thing in your home or apartment? Why?

The Bible. I place my faith in the Word of God.

What was the last song that got stuck in your head?

Wildest Dream by Taylor Swift. I was so impressed with her courage to speak out on important issues in political campaigns, though others disagreed. I applaud her for living in faith with tolerance and respect for those beyond her own. It takes great courage to love. Plus, I like dancing to her album 1989. Her new album is a little too dark for me, but Taylor is a bright light in a dark world shedding light on darkness to drive it out into the light.

What is something that has been a struggle in your life?

I made my love for a man an idol and placed my life on hold hoping to marry him. His dream was to be a math teacher. So, I lived my life trying to help him achieve his dream by periodically working in

the schools, gaining additional teaching licenses. I have six teaching licenses: Social Studies, Middle School Math, Physical Education, Health, Elementary Education and Special Education. My attempts did not strengthen our love. It just caused resentment. I learned you can't live for one person, or make one thing here in this world your everything. We are called to live for God foremost. So, God removed him from my life. So, I would have stronger faith in God through Jesus.

Do you believe that it's beneficial for state legislators to have previous experience in government or politics?

It depends.

Prior experience can lead to corruption when officials merely serve those who serve them instead of performing their job by serving the people. The focus must be serving the people, not merely those who serve us. We must work together and communicate, even when we respectfully disagree, but we should not use relationships to better our positions instead of those we are seeking to serve, the Delawareans.

What do you perceive to be your state's greatest challenges over the next decade?

The negative consequences of deregulation and the defunding of the federal government that will impact Delawareans down the road is the greatest issue legislators must address, and not hide from. We need to prepare for what is ahead, a short fall of expected federal funds, which will lead to a short fall of state and local funds. Deregulation sounds great until you realize you must increase local taxes to pay for things or go without. The Federal government gives money to Delaware, in part, under its authority under Article I Section 8 of the Constitution, the Spending Clause. Delaware receives money with strings attached, called regulations. If Delaware doesn't adhere to the regulations, we do not receive money. As the federal government deregulates, it will continue to defund programs in Delaware. That means state and local governments must pay for more or go without. We must also prepare for the removal of environmental laws by the Federal Government to prevent harm by creating policies and local laws to protect, preserve and maintain our beautiful beach environment.

What do you believe is the ideal relationship between the governor and the state legislator?

They function as checks and balances upon each other to work together to serve the American people.

Do you believe it's beneficial to build relationships with other legislator's? Please explain your answer.

It depends. If the focus is on serving the people it is positive. If the focus is on serving yourself or merely those who serve you, that leads to corruption. The relationship must be professional for the purpose of serving the people, not personal with the purpose of serving each other's own backs, to be beneficial.

What process do you favor for redistricting?

No determination has been made at this time.

If you are not a current legislator, are there certain committees that you would want to be part of?

No determination has been made at this time.

If you are not currently a member of your party's leadership in the legislature, would you be interested in joining the leadership. If so, in what role?

No determination has been made at this time.

Is there a particular legislator, past or present, whom you want to model yourself after?

President Obama. He reminds me of my father, Pat Kelly, in that he is brilliant, disciplined, respectful and a graceful speaker.

Although, I did not agree with all of his choices, I respect him for having the courage to choose to support what he believed would protect and improve the lives of others. Thank you President Obama for being our greatest President. I am saddened by the great backlash of our nation after we elected our first black president.

We had our first black president in 2008. In 2016, our country gave the popular vote to our first woman to win such. Sadly, the electoral college chose an unqualified man over a woman due to their prejudice.

In 1870, black men gained the right to vote with the passage of the 15th Amendment. It was not until 50 years later, in 1920, that women gained the right to vote with the passage of the 19th Amendment. Must we wait 50 more years before men recognize woman as people, as leaders, and not as something to look at, use or do. Women are people not things.

It is not a man's world. It is our world, both men and women's world to share. We respect and honor both men and women, not just men.

Thank you President Obama for your platform of hope and life that reflects that hope. President Obama you reminded us prejudice is wrong. You give us courage and hope. Thank you.

Are you interested in running for a different political office in the future?

I am interested in running for federal congress. I have proposed ideas relating to federal laws, including but not limited to: saving the post office, to ensure additional funding on social security, so we can take care of our elderly instead of take advantage of them, to prevent oil drilling, and with regards to drafting laws to reduce the price of healthcare without reducing the quality or the amount of care. So far, the federal legislators have not addressed my suggestions.

I will try to improve the laws in Delaware first. Maybe this position will give me a greater voice to share my ideas to federal legislators. So, maybe I will not be required to run. Nevertheless, I am not leaving it out. If no one will step up to help when they are able, and I am afforded the opportunity and the financial ability to do so, I will.

Both sitting legislators and candidates for office hear many stories from the residents of their district. Is there a story that you heard that you found particularly touching, memorable or impactful?

I am saddened by people I grew up with condemning blacks and the poor. The same people condemn people who do not give to charities, which is hypocritical. As a Christian, I believe we should give in secret pursuant to Matthew 6 instead of to be seen, for tax breaks and cheap marketing. Instead of giving money for something in return, we should do it out of love or it is not charity. Love is not self serving, pursuant to 1 Corinthians 13:4-7.

I am saddened by people condemning, blaming and shaming the down trodden instead of lifting them up. The story in my community is the story I see by those I love and grew up with that choose to fear and hate, instead of respect or love. I choose to teach them hate is wrong.

Where is the beach?

*Vote
Meghan Kelly
38th District*



Safe Guards From Corruption, bias and undue influence

I am a Democrat, but I intend to serve everyone. So, regardless of party affiliation, I would love to hear what is important to people within the community. People may feel free to contact me at 302-537-1089 or electmegkelly@icloud.com. Otherwise, I hope to see people at walk and talks.

I received permission from Bethany to informally meet with people at the Bethany Beach Board walk, every third Saturday, at 5:00 PM to "walk and talk" with people. I am copying Delaware Senator Bryan Townsend's "walk and talks" as they seem like a free, fun, fit way to talk with people in the community. I look forward to meeting people. Please dress down and wear comfortable shoes.

I am not going to accept monetary donations during my campaign, to prevent the appearance of undue influence or favoritism, except by the Democrat party. Nor am I going to give monetary donations, or attend events that require fees as that may make the appearance of buying votes. So, I intend to attend free events, such as chamber events, economic development meetings, environmental groups, town hall meetings, and other events that will not cost attendees or me any money.

I was thinking about doing fundraisers at restaurants, but I changed my mind when someone asked me to go to a dinner fundraiser "because it would be good for my campaign." I immediately thought of scripture. "Everything they do is done for people to see:...They love the place of honor at banquets and the most important seats in the [places of worship]; they love to be greeted with respect in the marketplace...". Matthew 23:5-7

I should not go to events merely to be seen as allegedly giving to charity. Due to my religious beliefs as a Christian, I do not believe this is true charity. Instead it is self serving. I do not want to be a hypocrite and turn people away from a good God by such deceptive choices. I believe it is better to help in secret rather than openly participate in charitable events or provide funds to fundraisers, groups and charities. I respect other people's religious beliefs. So, I hope they respect my dedication to my faith too.

Thus, I strive to give to those in need directly without recognition, financial gain, cheap marketing, or tax breaks. Please see the Bible, NIV version Matthew 6:1-4 which provides:

"Be careful not to practice your righteousness in front of others to be seen by them. If you do, you will have no reward from your Father in heaven. So when you give to the needy, do not announce it with trumpets, as the hypocrites do in the [places of worship] and on the streets, to be honored by others. Truly I tell you, they have received their reward in full. But when you give to the needy, do not let your left hand know what your right hand is doing, so that your giving may be in secret. Then your Father, who sees what is done in secret, will reward you."

Accordingly, I perform charitable work in secret. I have dropped off clothing at schools where there is a higher poverty rate. I have given food to those in need directly. I have never held an official position in my church, St Anne's, located in Bethany beach, but I have helped out when requested through prayer, participation in plays, filling in for Sunday School teaching and other similar activities.

By the way, I do not believe there is any shame when people cannot afford to give to others in need. After all in the bible in Acts, Chapter 3, Peter gave no money to a beggar.

People should not feel shame because they have nothing to give either. So many are struggling here and across our nation. I do not want to mislead them into hurting themselves financially.

People are not somehow good people merely because they are rich, nor are people somehow bad people because they are poor.

Please note, I am respectful of my colleagues beliefs relating to charities, and I applaud others for helping one another in the manner they think best.

During this election, I will not give attorney advice. I reserve the right to provide any and all information to another attorney (or seek relief on my own), should I discover unlawful conduct.

Do not call me for legal advice please.

No favors because I know you when I am elected. People should be hired or receive funding based on how well they will perform a job. It is wrong to merely serve those who serve me. I need to look out for all of the constituents.

Thank you for supporting me in serving you.

Meghan Kelly, Esquire
Licensed DE, DC, PA, US Supreme Court
electmegkelly@icloud.com



PAID FOR BY MEGHAN KELLY, Esquire for 38th Dist.

I, Meghan Kelly, Esquire am pleased to announce my candidacy for the 38th District House of Representatives Seat in the state of Delaware.

I have been licensed to practice law for more than ten years in this state. I have reviewed proposed laws periodically starting in 2006 at Richards, Layton and Finger, and throughout the years since, and I have discovered a strong desire to draft and amend laws to better serve Delawareans.

So, I found myself filing to run for office in hopes I could improve the lives of people in the community I grew up in and love.

I am honored for the opportunity serve you.

PURPOSE

- * Amend and draft laws that better serve Delawareans.
- * Focus on serving people, and preventing abuse and corruption by those who seek to take advantage of Delawareans for profit or gain.
- * Work on solving problems while holding individuals and businesses receiving funds personally accountable for loss and self dealing
- * Uphold Delawareans' freedoms and fair application of the laws regardless of race, religion, gender, age, wealth or poverty. Every citizen is important and valuable to our community.

PLATFORM

- * Seek improvement on infrastructure
- * Healthcare
- * Clean Water
- * Preserving the Environment

I am a supporter of education at all ages. We are all learners and teachers. Every citizen at every age is valuable, and is worthy of opportunity. A student's worth does not diminish when schooling ends, and Delawareans do not necessarily need to go into debt in order to gain employment. Nevertheless, they do need to have a valuable skill. We should encourage people of all ages to invest in themselves throughout their lives, not merely when they are young.

I am open to discussions on how we can help our current available work force to thrive instead of merely survive. Too many talented, smart, hard working people are taking on multiple jobs to make ends meet. Others work three to five months during the summer season, in our resort town. Then they rely on unemployment and welfare to get by. With federal cuts, this may no longer be an option. Crime to survive is not an option either.

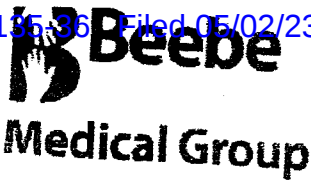
I do not have the answers in this area. Nevertheless, I am open to discussions. I will need your help to create better paying opportunities in Sussex County that will lift our neighbors out of poverty and prevent them from turning towards crime.

Thank you for supporting me in serving you.

Very truly,
Meg Kelly, Esquire
Licensed, DE, DC, PA, US Supreme Court
electmegkelly@icloud.com

EXHIBIT

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Beebe Walkin Care at Millville
RALPH DEFRIECE, MD
32550 Docs Place Unit 1
MILLVILLE, DE 19967-6953
Phone: (302) 541-4175, Fax: (302) 645-4922

Patient Care Summary for Meghan Kelly

Most Recent Encounter

11/25/2020

Reason for Visit

Vitals

BP: 138/87 sitting

O2Sat: 96% Room Air at Rest

Pulse: 80 bpm

T: 98.2 F / 36.8 C

RR: 16

Vaccine List

None recorded

Point of Care Testing

The following includes any point of care testing done in the office today.

None recorded

Assessment and Plan

The following list includes any diagnoses that were discussed at your visit, and information about any order(s) that your provider has

This is high ☹️