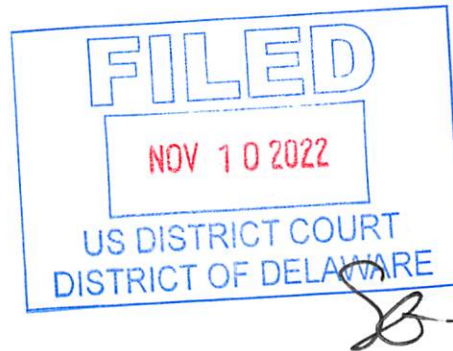


# Exhibit A



SUPREME COURT OF PENNSYLVANIA

|                           |   |                                     |
|---------------------------|---|-------------------------------------|
| IN THE MATTER OF A MEMBER | § | No. 2913 DD3                        |
| OF THE BAR                | § | No. 118 DB 2022                     |
|                           | § | (Supreme Court of Delaware, No. 58, |
|                           | § | 2022)                               |
| MEGHAN M. KELLY,          | § | Attorney Registration No. 202268    |
| Respondent.               | § | (out of state)                      |

**Respondent’s Motion for an extension of time to respond to PA Disciplinary Counsel’s Answer in opposition to my Motion for a stay**

I, Respondent Meghan M. Kelly move the Court pursuant to Pa.R.A.P. 105(b) for good cause for an extension of time in the amount of 45 days to file a reply to opposing counsel’s Answer in opposition to my motion to stay the proceeding until both the appeal of the original Delaware disciplinary proceeding and the civil rights case has concluded or the time of appeal has expired to prevent a government created substantial burden by this Court to my access to another Court vitiating my 1st Amendment liberty interests in speech, belief, exercise of religious belief, association, speech and the right to petition, applicable to the state pursuant to the 14<sup>th</sup> Amendment.

1. On October 24, 2022, I emailed opposing counsel and asked for his stance on a Motion for an extension to respond to his answer on my motion to stay the proceeding. (**Exhibit A**, attached hereto and incorporated herein. I incorporate herein by reference every exhibit I mention in this motion in its entirety.)

2. On October 26, 2022, opposing counsel (“PA-ODC”) opposed my request for an extension of time To prevent irreparable injury to me, I require 45 days or more to respond to opposing counsel’s answer. (**Exhibit B**).

3. On October 26, 2022, I responded to opposing counsel's email. I incorporate my response herein, regarding the complication of issues, discussing merely one of many. (**Exhibit B**).

4. The issue referred to in **Exhibit B** relates to my 2016 complaint to the Delaware Office of Disciplinary counsel (herein referred to as "DE-ODC") concerning out of state title companies performing attorney work without a license. Out of state title companies took advantage of my esteemed deceased friend Dick Goll, Esq., allegedly messed up the chain of title for deeds, and cost the state of Delaware untaxable money. DE-ODC acted annoyed by my verbal complaint by phone. The DE-ODC didn't appear to care about the harm towards the public or the state or lawyers, like my esteemed colleague Dick Goll, Esq. I ran for office in 2018 because no one would help me with this issue. See the attached **Exhibit B-2** to see my proposed solution the Coastal Point local newspaper published. To date, the problem has not been resolved.

5. DE-ODC brought the disciplinary proceeding against me to cover up years of disparate treatment against me based on religious-political beliefs or poverty animus, and to cover up state misconduct. This is a complicated matter where I invoke meaningful opportunity to be heard in light of the exigent circumstances and immediate irreparable injury I face. (Please see the Draft Amended Complaint, filed with the Delaware District Court on January 24, 2022, and the redline of the signature page. District Court Docket Item ( hereinafter "DI") No. 43-44. I labeled this 3 and 4 in hopes to ease with filing. Please note the additional equal protections and procedural due process violations by the Delaware Supreme Court and the State agents. I included the Supreme Court and its members in this amended Complaint); (See, **Exhibit C**, my Motion to exempt costs in another Court, the Eastern District Court of PA. This is distinguished

from a motion to file in forma pauperis. Please see paragraph 11 therein. I point out I lost 2 million dollars in expected income over the years, based on retaliation by the Delaware Supreme Court arms in retaliation for my request for help back in 2006 and 2007).

6. Also, please refer to **Exhibit D** regarding judges teaching lawyers in a continuing legal education course to have poverty and place of origin animus. This creates a taught foundation of injustice and prejudices the administration of justice. Also see, **Exhibits E and F** where I petitioned the Delaware family court to be removed from the list of rotating attorneys appointed for guardian cases due to religious reasons. My request was ignored. I was appointed again, requiring I petition to be excused and again removed from the list. Id.

7. I am aware of another case in which an attorney is being selectively disciplined allegedly based on his small firm status. Whereas lawyers who bring in more money to the state who work in government or larger firms are more favorably treated. See, *Abbott v. Mette, Civil Action No. 20-131-RGA*, (D. Del. Jan. 31, 2021). While there seems to be a lineage of case law indicating courts which violate procedural or substantive due process rights may lose subject matter jurisdiction or subject matter is voidable, I should like to argue subject matter jurisdiction should also be lost by courts who display animus based on wealth or firm size or place of origin animus to prevent injustices from continuing to occur towards lawyers like Richard Abbott. I may be able to persuade the courts to create precedent due to the religious-political, poverty and place of origin animus towards me to help others from unjust disparate treatment within our judicial system arguably in violation of the equal protections clause of the 14<sup>th</sup> Amendment applicable to state courts and the 5<sup>th</sup> Amendment Equal Protections component applicable to federal courts. I have limited ability to research. So, should this precedent already exist I apologize, I have not found it. The wrongfully persecuted attorney Richard Abbott could argue a

partial unfairness element in violation of his due process protections, but I should like the US Supreme Court to create new case law requiring courts adhere to equal protections of the law or lose subject matter jurisdiction too.

8. In my appeal to the Third Circuit, I believe I mentioned an equal protections argument, but I forgot to separately point it out in hopes to help the public and aid other wrongfully persecuted lawyers including Richard Abbott. (Pages 8, 10, 15, 19, 20, 28, 29, 30, 35, 39, 40, 43, with particular focus on page 19). Since the proceedings are hidden before the Boards in many if not in all states, lawyers cannot shed light on injustice unless professionals risk the of additional harm by bringing additional law suits like Richard Abbott bravely did. We do not know all of the instances where lawyers and other professionals in Board proceedings are wrongfully persecuted in violation of the equal protections clause of the 14<sup>th</sup> Amendment applicable to the states or the 5<sup>th</sup> Amendment applicable to the federal government. Attached, please find my Brief I incorporate herein I filed with the Third Circuit in my civil rights case relating to this matter, attachments thereto, a motion incorporated therein, as **Exhibits G, H, I, J, K**. Also find **Exhibit L** alerting the court to a planned preventable economic crash. This relates to my defense to reciprocal punishment. The DE-ODC brought the law suit with religious-political animus to punish me for my religious-political activity, beliefs and speech and petitions. I was punished not only for my religious beliefs but my political beliefs too. My political beliefs admittedly are based on my religious belief in caring for people while protecting their free will, their liberty with limits to prevent people from oppressing to enslave others. I have religious objections to exploiting people to serve profit, power and position. Also attached, please find a motion I filed in the Third Circuit, attached hereto as **Exhibit M**, and the Third Circuit's order accepting my brief and denying my motion as not ripe, without prejudice, I incorporate herein, as

**Exhibit N.** The Court indicated I may request an extension again should I need one per the attached order. **Exhibit N.**

9. The Third Circuit is entertaining briefs at this time. Attached as Exhibit O, please find the docket for the Third Circuit. There are over 100 docket entries. Once this case gets started it will likely last for more than a year causing needless expenses to all involved, since this case will likely be overturned due to fatal violations of procedural due process in the original DE disciplinary case.

10. It is a waste of resources to begin this case, requiring I call the Delaware Supreme Court justices, and two staff terminated for the Delaware Courts to conceal their testimony material to my defense, Arline Simmons and Katrina Kruger.

11. Two Court staff were terminated from the court to conceal their testimony material to my defense in the original disciplinary case, and the civil rights case.

12. I petitioned the Delaware Chancery and Supreme court about disparate treatment based on religious, political or poverty animus. These petitions were sealed without my knowledge, notice or an opportunity to be heard, and without legal justification on the date the preliminary committee met to determine whether cause existed to bring a case against me November 3, 2021.

13. Terminating staff and fraudulently concealing evidence in my favor to cover up misbehavior, does not improve behavior. It merely hides it.

14. I care about the two staff members who were compelled to retire to hide state misconduct. The Delaware and Chancery Courts were not looking after these two people by enticing them to retire. They were looking after their own appearance.

15. I would prefer to stay the proceeding in order not to be compelled to call witnesses, including the two terminated staff and Delaware judges too, needlessly in this forum, when their testimony may be more easily retrieved in the open Delaware District Court civil rights proceeding. I want to protect these two wronged staff, not increase their burden. It does not matter that they exhibited prejudice towards me. We correct misbehavior, we do not destroy people who make bad choices. We love them, while guiding the misguided.

16. I am sad the Court enticed two staff members to retire to protect the court's appearance, while preventing me from calling them by denying my motions to perform discovery, and my Motion to call Arline Simmons as a witness, filed January 15, 2022, during the Board proceeding in the state of Delaware.

17. The Delaware Supreme Court also fraudulently sealed and concealed 4 documents I filed in Kelly v Trump on the date the preliminary hearing to find cause to prosecute me took place, November 3, 2021. The Delaware Supreme Court did this without providing me with notice or an opportunity to be heard, without lawful cause, to fraudulently prejudice my case in the sham DE disciplinary proceeding against me. I have been asking Lisa Dolph for exact dates the docket items in this case were sealed, and made available electronically to the public. She evades answering. The Court also misled me to believe the disciplinary case was available electronically to the public as of September 7, 2022 or soon thereafter. It was not. I was required to make multiple requests to Lisa Dolph, the Clerk of the Delaware supreme Court to unseal the record in compliance with the September 7, 2022 order. Attached, please find two letters I filed with the Delaware Supreme Court I incorporate herein by reference relating to the Delaware Supreme Court's concealment of documents to prejudice my cases, my original disciplinary case, the civil rights case, appeals and reciprocal cases. (**Exhibit P**).

18. I intend to appeal decisions to the US Supreme Court.
19. I have fewer than 40 days to appeal two Orders to the United States Supreme Court.
20. I do not practice law in Pennsylvania. I am retired.
21. Opposing counsel did not oppose a 30 day extension to file objections.
22. There is little prejudice to PA-ODC by allowing me an extension to respond to PA-ODC's Answer, in order not to compel me to forgo a substantial burden to my access to another court in order to defend my license, liberty interest and my faith in Jesus Christ.
23. I face irreparable injury should an extension not be granted.
24. I do not want to risk eliminating my right to access to the courts to prevent irreparable injury in the form of the Delaware Supreme Court, the Board and Disciplinary Counsel's infringement upon my free exercise of religious-political belief, exercise, speech and association. Nor do I desire to lose my property interest in my Delaware license to practice law. A lawyer's right, my right to pursue my profession constitutes a property protected by the due process clause of the Fourteenth Amendment, and of which I cannot be deprived for any whimsical, capricious or unreasonable cause, including the state's disagreement with my religious-political beliefs contained in speech in religious-political petitions.
25. My eternal life is more valuable to me than gaining this world.
26. I am not acting as an attorney in the civil rights proceeding, or in my potential appeals to the US Supreme Court. I am a party defending my exercise of religious beliefs. I am fighting for my eternal soul from being condemned to hell. I am a Christian. I believe people



are misled to harm and hell by blindly trusting in experts, professionals, including doctors, mental healthcare staff, psychologist and other healthcare professionals or scientists. I have religious objections to healthcare and mental health examinations and treatment.

27. In undergrad I took a course relating to the history of Western Medicine. I learned how horrible healthcare business always has been, or seemed to be. I believe people go to hell for blindly doing what they are trained to do, told to do, or what their employer requires them to do without considering the potential harm towards the customers or patients they serve. I believe not knowing is guilt leading to hell, blinded by a paycheck from caring to know, in order to love others as yourself. They love money more.

28. The courts should discern truth instead of allowing professionals to be above the law by rendering the standard of care of the professionals to be the standard of the law. The Courts should protect individuals and individual liberty from being sacrificed or sold to serve business greed by making professionals and experts above the law by making their standards the letter of the law. I believe business greed is the mark of lawlessness that damns people to hell should they not repent as I alleged in my pleadings in Kelly v Trump. Lawlessness is rendered the law when judges delegate their power to judge truth to experts, science or professionals to serve businesses as opposed to protecting consumers and individuals. I desire the courts to exercise their power, not refrain from protecting people and individual liberty in light of public criticism.

29. Delaware's sham proceeding and fixed findings are unacceptable, creating dangerous precedent that anyone who believes differently than the government backed partners may be disparaged as mentally disabled for such diverse religious or political beliefs. I must be

granted a meaningful and fair opportunity to appeal to the US Supreme Court and in the Civil proceeding.

30. In addition, I must have confirmation that I will not be compelled by this Court to violate my religious beliefs by costs and indebtedness. My belief in Jesus is more important than money or a profession, but is not to be exchanged for the mere license to buy and sell in a profession. My belief is freely chosen.

31. I have fewer than 40 days to appeal two decisions to the US Supreme Court. I have not had the opportunity to start since I have been stone walled in other ancillary proceedings.

32. It is reasonable to ask for enough time to merely appeal to the US Supreme Court in light of my dire poverty, and irreparable injury I face.

33. My belief in Jesus is not a disability, but I do have limitations that no drug or treatment may improve. My imperfect body does not make me disabled, merely because it is an inconvenience for others that I require water, exercise and rest to prevent death by dehydration for a week every month.

34. The DE-ODC claims my religious beliefs are evidence of a disability. ( Petition at 7). The DE-ODC seeks to disparage my character to dismiss my allegations of state misconduct in interference with Kelly v Trump, and for years of mistreatment based on my religious-political beliefs.

35. So, I write with haste. Rights imperfectly asserted under the duress of days to file, are better than waiving rights for failure to file.

36. I seek to prevent this Court from 1) vitiating my right to access to other courts in defense of First Amendment right of belief, speech, exercise of belief, association and the right to petition the court when I believe there has been a grievance committed against me; 2) vitiating my right to religious belief against swearing in, psychological examinations or healthcare examinations, 3) vitiating speech, belief, exercise of belief, and association, 4) creating irreparable injury to my reputation, 5) economic loss in terms of loss of opportunity to work in my profession in Delaware, 6) waste of expenses creating a substantial burden to all involved, opposing counsel, me and the courts, and other potential harm US Amend I, XIV. (**Exhibit Q** regarding swearing and affirming is against my religious beliefs)

37. I am licensed in other jurisdictions. I am licensed to practice law before the Eastern District Court for the District of PA.

38. The Eastern District Court of PA is seeking reciprocal discipline against me.

39. Pursuant to the Local Rules of Civil Procedure United States District Court for the Eastern District of PA (Hereinafter "LRCP R"), it appears that Court may appoint PA-ODC to prosecute me in that case too for my religious political petition to dissolve former President Trump's establishment of government religion. (See LRCP R 83.6 V (c) and (d)). (**Exhibit R**)

40. It will not alleviate my dire situation where I face additional irreparable harm should I fail to contest reciprocal discipline before this court. Since, the PA-ODC will likely sue me in another court, the Eastern District of PA, District Court in hopes to interfere with my opportunity to be heard in my civil rights case and appeals before the US Supreme Court to fix the case for the convenience of his office. PA-ODC's goal is to win at the cost of depriving me of the opportunity to be heard and my First amendment liberties.

41. I am licensed before the US Supreme Court too. (**Exhibit S**). Any additional disciplinary determination may prejudice any appeal from my civil rights case or disciplinary proceedings.

42. I face irreparable injury in terms of threats to my life for my religious political beliefs. A stranger talked about shooting me. I do not have a police report concerning that instance. I talked with a uniformed police man from my former gym about that occurrence while I showed him my vehicle with substance thrown all over it in the parking lot of the gym. I thought a report was made. I went to all of the local police departments. I also went to the state police department. It appears the policeman was acting as a mere gymmate friend. He did not file a report for the substance on my car and did not make a record of my complaint about a stranger talking about shooting me because of my stickers on my vehicle.

43. I do have a police report concerning another instance where I called the police. A former marine had previously threatened to ram my vehicle if I park on the front of one of my family's lots in front of his home. He allegedly talked about shooting someone should someone at the HOA come on his property without permission, during an HOA meeting. He threatened me when I placed a sign up on my property. Given the past threats, I was scared. I called the police when he threatened me about my sign on my family's lot. In the report he indicates he hates my signs. I live in Trump territory where people still have Trump signs up in my development and throughout Sussex County, DE. To my chagrin and sadness, there are also confederate flags in certain parts. I should be able to exercise free speech without government intimidation or government incitement of private harm towards me or my person for my religious-political speech, including signs or bumper stickers.

44. If I am remain adjudicated disabled but for my religious-political beliefs, and am threatened with harm to my life or body, I may not be taken seriously. I may be killed. I must be afforded time and opportunity to seek to overturn the ruling in Delaware to protect my life, liberty and eternal life.

45. My neighbor is misguided, and has a heart condition. I am no longer scared of him since I have called the police. I do not want to bother him, or upset him because I do not want his health to worsen.

46. Other people in my home county are misguided into this “us verses them mentality,” instead of respecting freedom to believe, associate and speak on the beliefs of one’s own conscience without government backed or incited social, physical or economic persecution. It makes my heart sad to hear people say military might and killing other people is the solution. I keep saying seeking justice in the courts is the solution. My hope of a hero remains in using words, not weapons, the courts, not bullets.

47. Both democrats and republicans are attacking the courts in an attempt to peer pressure the courts to bend to the fickle trends of their immediate desires.

48. I oppose Congressional proposals to regulate the courts by third parties or by self-regulation. In fact, I hope to appeal the Third Circuit’s reciprocal decision in order to give the US Supreme Court an opportunity to have a voice, not only on attorney regulation but federal judge, and judge regulation too. That affects the integrity of the practice of law and affects me since I have a license.

49. There appears to not only be verbal attacks upon the courts, but there real plans by private and foreign partners to automate the practice of law down the line, eliminating lawyers and judges.

50. There are also more heinous plans than merely eliminating fiat currency to create a new economic model based on electronic currency controlled by central banks, not governments.

51. There appears to be a plan to transfer control of resources under the guise of allowing technology to manage all the resources to delegate them more equally. (Exhibit U) This plan eliminates freedom by control through alleged technology of the entire world, the people and the resources.

52. This plan must be stopped. I understand the plan is schemed to take affect probably past my fleeting life. Yet, I must alert this Court. The courts must end partnerships with private and foreign partners to govern and guide. The government must not collude, collaborate or partner with private and foreign partners since that makes the government's partners above the government's enforcement of the law. The government will not likely sue its partner. This is one way to prevent the private and foreign partners from taking over government control.

53. While proposals of eliminating religions, governments and control of all the resources of the world are mere theories at this stage, there are too many people building a foundation to allow these theories to become a reality for me to blind my eyes to it.

54. I am running out of time, and I am exhausted. Please afford me 45 days to respond to opposing counsel's answer to my motion for a stay. Please afford me an opportunity

to appeal two decisions with the US Supreme Court that may not only protect my freedoms, but may protect the integrity of the practice of law and the freedoms of all.

Wherefore, I pray this court grants this motion.

November 3, 2022

Respectfully submitted,

/s/Meghan Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com (302) 493-6693  
Retired Bar No. 202268, INACTIVE, not practicing  
law on behalf of another

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

Dated: November 3, 2022

Meghan Kelly (printed)

 (signed)

**Table of Contents**  
**for Respondent Meghan M Kelly's Motion for an extension of time pursuant to Pa.R.A.P. 105(b), in the amount of 45 days to reply to opposing counsel's Answer in opposition to my motion to stay the proceeding**

**Exhibit A**     October 24, 2022 Email to opposing counsel ("PA-ODC") asking his stance on a 45 day extension of time to file a response to his answer to my motion for a stay.

**Exhibit B**     Email from PA-ODC, dated October 24, 2022, objecting to my request for an extension of time, and my emailed response, dated October 24, 2022 indicating update on the 4 missing documents in Kelly v Trump, indication of the complexity of this case with the years of disparate treatment and retaliation for petition, indication of one instance where I reported money not getting in the coffers of DE due to out of state title companies practicing law without a license, obituary of my friend and esteemed colleague Dick Goll, Esq. who appeared to be taken advantage of one title company.

**Exhibit B-2**    Coastal Point Newspaper article, dated July 6, 2018, *Candidate discusses title companies' issues*, by Meghan Kelly, page A16 and A18.

**Exhibit part 1 of 2, DI 43-3**, in Civil rights case Kelly v Swartz, Delaware District Court, No 21-1490, Amended Complaint without signature page, filed January 24, 2022

**Exhibit part 2 DI 2 4**, in Civil rights case Kelly v Swartz, Delaware District Court, No 21-1490, Blackline of changes to signature page, filed January 24, 2022

**Exhibit C**     *Respondent Meghan Kelly's Motion for good cause to waive record, transcript fees, filing fees and other court costs by the clerk and by this Court*, filed with the Eastern District of PA, District Court, dated October 17, 2022.



**Exhibit D** Letter to Honorable Delaware Supreme Court justice Henry Dupont Ridgely, dated October 1, 2012 regarding my concerns about judges teaching lawyers at a Continuing Legal Education Course to have economic or size of firm animus, or place of origin animus, especially with regards to out of state animus.

**Exhibit E** Letter to the Honorable Delaware Family Court Judge Peter B. Jones, dated December 10, 2009, concerning a meeting with him about my appointment to a guardianship case, and my request to be removed from the list of rotating list of attorneys who are required to represent clients in family law proceedings due to religious reasons.

**Exhibit F** Letter to Delaware Family Court Judge Chandlee Johnson Kuhn, dated October 12, 2012, requesting I be removed from the rotating list of attorneys appointed to family law proceedings due to religious reasons.

**Exhibit Brief part 1** Title page, and table of citations of *Appellant Plaintiff Meghan Kelly's Opening Brief* moving the Third Circuit Court of Appeals to vacate the Delaware District Orders (DI. DI 16-17, 30-31, 59-60), and to remand the matter to the Delaware District Court for Consideration, dated October 22, 2022.

**Exhibit Brief part 2** Argument in *Appellant Plaintiff Meghan Kelly's Opening Brief* moving the Third Circuit Court of Appeals to vacate the Delaware District Orders (DI. DI 16-17, 30-31, 59-60), and to remand the matter to the Delaware District Court for Consideration, dated October 22, 2022.

**Exhibit G** Attachment to the Brief, Letter to the Honorable Master Patricia Griffin of the Delaware Chancery Court, dated December 11, 2020.

**Exhibit H** Incorporated in Brief, Respondent Meghan Kelly's corrected Motion, for good cause, for additional time to draft the Brief in light of Order, dated October 18, 2022, at DI 94, dated October 21, 2022.

**Exhibit I** Exhibit to H, Respondent Meghan Kelly's Motion for good cause, 1 Pursuant to Supreme Court Rule 9, to Unseal the Record, 2. to declare self-regulation of attorneys, other Professions, and judges unconstitutional, making business above the law, by making the dictates of professionals, or bureaucrats within agencies, as opposed to laws enacted by congress people, checked by the vote of the people, the law, and 3. in lieu of and in the alternative, eliminate the secret trial requirements of professionals before Boards, including the Board on Professional Responsibility, requiring the choice of an open or confidential forum left to the accused professional, instead of requiring a secret proceeding, concealing the accused's defense, to the advantage of the accuser state, in violation of equal protections, and due process 1st and 14th Protections, dated August 15, 2022

**Exhibit J** Exhibit to H, Respondent Meghan Kelly's Motion to 1. declare the Reporting Requirements unconstitutional, requiring by written rule I violate my 5<sup>th</sup> Amendment right not to testify against myself to the government in order that the government may have evidence to prosecute me, 2. Declare the Case and Controversy requirements are not met in the system of attorney self-regulation, dated August 19, 2022

**Exhibit K** Exhibit to H, Letter to the Delaware Supreme Court seeking permission to explain legal theories to reverse or prevent a planned economic crash and elimination of fiat currency, dated August 29, 2022.

**Exhibit L** Letter to the Delaware Supreme Court in Kelly v Trump 21-119, dated July 21, 2021 regarding preventing or reversing the planned elimination of the fiat dollar and economic crash. Please note, I was wrong about the Honorable Justice Robert's wife. I do not believe she has been involved in politics in a long time.

**Exhibit M** Appellant Plaintiff Meghan Kelly's Motion, for good cause, for additional time to draft the reply brief and to grant opposing counsel additional time to be fair, dated October 22, 2022

**Exhibit N** Order by the Honorable Third Circuit Judge Peter J. Phipps, dated October 24, 2022

**Exhibit O** Docket for Kelly v Swartz, Case No 21-3198

**Exhibit DI 98** Letter I filed with the Delaware District Court, dated October 27, 2022 regarding docket's fraudulently sealed and concealed by the Delaware Supreme Court

**Exhibit P** DI 99, Letter I filed with the Delaware District Court, dated October 28, 2022, with an update on the concealed Delaware Supreme Court dockets.

**Exhibit Q** Motion filed regarding my religious beliefs against swearing and affirming filed with the Delaware Supreme Court, dated June 6, 2022

**Exhibit R** Eastern District of PA rules showing PA-ODC may sue me in that court too

**Exhibit S** Proof of my admissions to practice law before the US Supreme Court

**Exhibit T** Police report

**Exhibit U** pages from <https://www.thevenusproject.com/tvphistoryevent/project-america/>, and the Venus Project from [https://en.wikipedia.org/wiki/The\\_Venus\\_Project](https://en.wikipedia.org/wiki/The_Venus_Project)

# Exhibit A

2913 DD3 (Please provide stance for my request for an extension of time to file a respond to your answer opposing a stay

From: Meg Kelly (meghankellyesq@yahoo.com)  
To: anthony.sodroski@pacourts.us  
Cc: meghankellyesq@yahoo.com  
Date: Monday, October 24, 2022 at 01:03 PM EDT

Good afternoon,

On Saturday I filed the attached part 2 of a brief with the Third Circuit, under great duress. The Third Circuit gave me leave to file nonconforming docs, per the attached Order. However, the Third Circuit indicated this may not be accepted, and they need to look into it. So, I may need time to correct anything they have problems with.

Unless I am mistaken, I think I have 2 weeks to appeal the Third Circuit Order placing my license on disabled, without affording me, or the class of attorneys labeled disabled with the same Constitutional protections suspended or disbarred lawyers receive in violation of the Equal Protections clause as applied to me, and as applied to the class of attorneys labeled as suspended or disbarred, with the US Supreme Court.

I am not acting as an attorney on behalf of another. I am not only fighting as a party for my liberty interests and property interests, I am fighting for my eternal soul from being damned to hell under the temptation to sin against God by the government compelled pressures to violate my belief to the conformed, conditional pressures of the state. I have much to lose.

I have fewer than 45 days to appeal my Delaware Disciplinary proceeding to the US Supreme Court.

You indicated you do not oppose an extension of 30 days to file the for cause motion. Allowing me 45 days to respond to your Answer will not harm you. On the other hand failure to grant additional time or a stay may harm me by depriving me of my First Amendment right to speak, believe, associate, exercise beliefs, and petition the courts. I risk losing not only my property interests in my Delaware license, but additional licenses in other forums too.

I do not want to risk eliminating my right to access to the courts to prevent irreparable injury in the form of the Delaware Supreme Court, the Board and Disciplinary Counsel's infringement upon my free exercise of religious-political belief, exercise, speech and association. Nor do I desire to lose my property interest in my Delaware license to practice law. A lawyer's right, my right to pursue my profession constitutes a property protected by the due process clause of the Fourteenth Amendment, and of which I cannot be deprived for any whimsical, capricious or unreasonable cause, including the state's disagreement with my religious-political beliefs contained in speech in religious-political petitions. Nor do I want to risk losing my eternal soul for being a coward and giving into temptation of government compelled threats.

So, I write with haste.

I have religious opposition to Healthcare and mental health for evaluations and treatment.

I believe people sin by declarations and affirmations too. <sup>e.s.k</sup> These are issues I must be afforded time to appeal to the US Supreme Court, without foreseeable undue burdens by other jurisdictions without a compelling interest narrowly tailored to such interest to justify vitiating ~~my~~ <sup>m-b</sup> Constitutional rights.

I should be afforded meaningful opportunity to access to the courts to protect my fundamental rights without obstruction by reciprocating cases.

My economic hardship, and religious beliefs against debt also places an undue burden upon my access to courts under threat of involuntary servitude and damnation in hell in exchange for access to the courts.

I face other complications. Per the attached letter to Judge Diamond my filings are out of order, missing and include

another person's filings.

Thank you for your kind consideration.

Very truly,  
Meg  
Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939  
Please excuse typos. I am a poor typist

- DI 67 Order unconfirming page 45.pdf  
110.6kB
- Letter Third Circuit Oct 14.pdf  
71.5kB
- Corrected Motion for extension of time on Order DI 54.pdf  
178.6kB
- Brief part 2.pdf  
322.9kB
- DI 13 letter prejudice.pdf  
32kB
- DI-12-46 motion to extend.pdf  
130.6kB

# Exhibit B



**Re: 2913 DD3 (Status updated) Oct 26 DE Supreme Ct meeting/records were not unsealed Sept 7/issues with hidden 4 material documents in 21-119 Kelly v Trump**

**From:** Meg Kelly (meghankellyesq@yahoo.com)  
**To:** anthony.sodroski@pacourts.us  
**Cc:** meghankellyesq@yahoo.com; david.weiss@usdoj.gov  
**Date:** Wednesday, October 26, 2022 at 10:33 AM EDT

Good morning,

I am copying David Weiss, since I feel safer with him, should anything happen to me.

I just got off the phone with Lisa Dolph. The Delaware Supreme Court is conducting a meeting this morning, October 26, 2022. Lisa indicated she would speak with file and serve too, after or on the meeting.

Problems persist regarding 4 docket items that do not appear public in Kelly v Trump 21-1490. These documents prejudice my case by concealing necessary files material to my defense and my civil rights case. It appears they were concealed on or about the date the preliminary hearing took place in my case.

Lisa Dolph confessed that she allegedly tried to make the documents public in IMO M. Kelly No 22-58, but did not succeed. She says it previously did not work because of the type of case.

I am not certain I believe her because she disparately chose not to upload the Order for re-argument on the Court's web site until after my request September 22, 2022. I asked in the morning. I saw it was fixed in the evening. She did not tell me or respond to whether it was fixed.

The following week I thanked her for fixing it and requested more information on the status of unsealing documents. Other orders relating to attorney discipline are uploaded publicly. It is curious as Professor John Murray of Duquesne Law school would say, that my order was not uploaded until after I notified the Clerk of Court, Lisa Dolph.

This case is complex, with years of disparate treatment and retaliation for my exercise of petition the government against grievances, including but not limited to the loss of 100s if not 1000s of dollars in revenue in real estate law, where title companies practiced law without a license allegedly messing up the chain of title for some attorneys.

In 2016, I called the ODC and complained about the problem. They appeared annoyed. A Delaware Supreme Court justice offered to help and called me at work, but didn't. They appeared to be more concerned with the appearance of the practice of law than actual justice.

Attached, please find the obituary of my deceased, esteemed attorney friend, Dick Goll, Esq. I found out about out of state title companies practicing law without a license because I looked into his firm after his death. He was taken advantage of. I stand up for my friend's good name by standing up for others. I sought to correct the problem to prevent injustice. I contacted law makers. One pretended to help me, only to invite me to a signing to use me as a purse. He also indicated he was interested in me personally, and did not help me professionally under the guise of caring about the problem. That is gross.

I indicated no thank you. That was quite upsetting to go to someone for their professional authority only to be dismissed when I indicated I had no interest of a romantic or personal relationship.

This case is quite complex, as you know I got into trouble for petitioning the court or the Board for help and lost more than 2 million in expected income. There are years of disparate treatment towards me based on religious-political beliefs or association, place of origin animus, or to cover up government misconduct and mistakes.

It appears another esteemed attorney is being selectively targeted in violation of the Equal Protections Clause based on firm size and the amount of money a firm brings in when similarly situated attorneys are more favorably treated by the ODC.

I would like the opportunity to expand the case law which makes cases voidable based on procedural due process grounds to include equal protections ground to look after that attorney and others too.

On an aside, I see you attended Duquesne Law School and seminary school. My baby brother attended seminary. I am not forcing my beliefs upon you or the state. Caring for others is not controlling them to conform to my beliefs. I am merely seeking to exercise my religious beliefs without government substantial burdens and required violations in order to buy and sell as an attorney, speak, believe, exercise beliefs, associate and petition the courts.

I protect your freedom to disagree with my religious beliefs, but I do not protect your government authority to eliminate my religious beliefs by creation of substantial burdens upon them.

I am disappointed. Thank you for getting back to me.

Have a good day.

Very truly,  
Meg

On Wednesday, October 26, 2022 at 08:59:21 AM EDT, Anthony Sodroski <[anthony.sodroski@pacourts.us](mailto:anthony.sodroski@pacourts.us)> wrote:

Dear Ms. Kelly:

I have reviewed your October 24, 2022 emails and their attachments. Office of Disciplinary Counsel will not agree to your request.

Very truly yours,

Anthony P. Sodroski

**Anthony P. Sodroski**

**Counsel-in-Charge, Special Projects**

**Office of Disciplinary Counsel**

**1601 Market Street**

**Suite 3320**

**Philadelphia, PA 19103**

**(215) 560-6296 – Ext. 4937**

**Fax: (215) 560-4528**

**[anthony.sodroski@pacourts.us](mailto:anthony.sodroski@pacourts.us)**

**WARNING! This e-mail is covered by the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521**

chandlerfuneralhome.com  
302.478.7100



**RICHARD KURT GOLL**  
AGE: 76 • FENWICK ISLAND  
Richard Kurt Goll, age 76, of Fenwick Island died Sunday, June 12, 2016 at Atlantic General Hospital in Berlin. He was born in Havre de Grace, MD and was the son of the late Eugene and Elsa (Ziegler) Goll.

He was a respected attorney for over 50 years in Wilmington Delaware, Sussex County Delaware and Havre de Grace, Maryland.

He is survived by his wife, Nancy M. Goll of Fenwick Island; a son, Richard K. Goll Jr. and his wife Jennifer of Selbyville; a daughter, Cynthia G. Smith of Severna Park, MD; two brothers, Eugene Goll of Easton and Robert Goll of Havre de Grace, MD; a sister, Nancy Gibbons of Westminster, MD; two grandchildren, Carson Smith and Parker Smith.

Services will be held at a later date.

In lieu of flowers, donations in his memory may be sent to the American Diabetes Association (diabetes.org) or to the Sepsis Alliance (sepsis.org).

Condolences may be sent by visiting [www.bishopfhastingsfh.com](http://www.bishopfhastingsfh.com)

Dick Goll  
→  
My friend who died

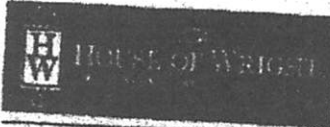
law.  
Lenox graduated from Howard High School and Lincoln University. He received an honorable discharge from the U.S. Army, serving in WWII.

Lenox retired after working over 40 years with the U.S. Post Office. His friends there often called him Stone-wall Jackson.

Lenox was a member of the Monday Club, Inc., and he was inducted into the Delaware Afro-American Sports Hall of Fame in April 2001.

Lacey loved Photography and listening to Jazz.

He was a well-known figure in the Wilmington Community and will be sorely missed.



**DESMOND JONES**  
AGE: 65 • NEW CASTLE, DE  
Mr. Jones departed this life June 02, 2016. Funeral 10AM, Sat., June 18th at Cathedral of Fresh Fire, 2300 Northeast Blvd., Wilm, DE; viewing 8-9:45am only. Burial, Gracelawn Memorial Park.

**CONGO FUNERAL HOME**  
[congofuneralhome.com](http://congofuneralhome.com)  
302.652.8887

... Grant, he continued to live and work in the area until his death.

Clarence is survived by his son, Clarence Jarrett, Jr.; three grandchildren, Isaiah, Ellis and Cameron; sisters Linda (Walter) Nickerson, Brenda (Robert) Young, and Flora Jarret; two brothers, Fred (Valerie) Jarrett and Earnest Daniels, Jr. and a host of nieces, nephew, relatives and friends.

Viewing will be held at The House of Wright Mortuary, 208 E. 5th St., Wilm, DE, Saturday, June 18 from 10:00 am to 11:00 am. Celebration of Life will begin at 11:00 am. Interment will be private.



### IN MEMORIAM

The Family Of  
**JOHN L.  
(JOE LOUIS)  
BAISE**

*Would like to thank everyone for all the acts of kindness shown to us during our bereavement. You may have sent a card, gave monetary or Food donation, volunteered your time Or talent, it was greatly appreciated God bless you all.*

**Loretta Baise and Family**

### BURIAL NOTICES

**SMITH, JUDY**

Judy Smith, 67, of S. DuPont Blvd., Smyrna, died on 6/11/2016.

Any relatives or friends are requested to immediately contact Joseph Kelly at Chandler Funeral Homes at office (302-478-7100) to claim the remains.



UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

|   |   |                        |
|---|---|------------------------|
| Meghan Kelly  | ) | No.: 1:21-cv-01490-CFC |
|   | ) |                        |
| Plaintiff,  | ) |                        |
| v.  | ) |                        |
| Disciplinary Counsel Patricia B. Swartz, Chief Disciplinary Counsel   | ) |                        |
| David A. White, Disciplinary Counsel Kathleen M. Vavala,  | ) |                        |
| Office of Disciplinary Counsel,   | ) |                        |
| Board of Professional Responsibility for the Supreme Court of Delaware,   | ) |                        |
| Delaware Supreme Court, a.k.a., Supreme Court State of Delaware, Justice Gary F. Traynor, Justice Karen L. Valihura, Chief Justice Collins J. Seitz, Jr., Justice James T. Vaughn, Jr., Justice Tamika R. Montgomery-Reeves, and Delaware Attorney General, Kathleen Jennings, in her capacity as Delaware Attorney General | ) |                        |
|   | ) |                        |
| Defendants.   | ) |                        |

PLAINTIFF’S AMENDED COMPLAINT  
MEGHAN KELLY

V.

DISCIPLINARY COUNSEL PATRICIA B. SWARTZ, OFFICE OF DISCIPLINARY COUNSEL, CHIEF DISCIPLINARY COUNSEL DAVID A. WHITE, DISCIPLINARY COUNSEL KATHLEEN M. VAVALA, THE BOARD OF PROFESSIONAL RESPONSIBILITY FOR THE SUPREME COURT OF DELAWARE, DELAWARE SUPREME COURT, A.K.A., SUPREME COURT STATE OF DELAWARE, JUSTICE GARY F. TRAYNOR, JUSTICE KAREN L. VALIHURA, CHIEF JUSTICE COLLIN J. SEITZ, JR., JUSTICE JAMES T. VAUGHR, JR., JUSTICE TAMIKA R. MONTGOMERY-REEVES, AND DELAWARE ATTORNEY GENERAL, KATHLEEN JENNINGS, IN HER CAPACITY AS DELAWARE ATTORNEY GENERAL

Meghan Kelly, by and through her own pro se representation, on January \_\_, 2022 brings this Amended Complaint pursuant to 42 USC §§§1983, 1985, 1988, FRCP R. 65, the First Amendment of the US Constitution, and the Fourteenth Amendment of the US Constitution, for injunctive relief, declaratory relief, a possible writ of mandamus,

nominal damages, damages, and any other equitable relief this Court deems just, and filed with consideration herewith, *Pro se Plaintiff's Motion to file in forma Pauperis, Plaintiff Meghan Kelly's Motion for permission to E-file through public access to court electronic records (PACER); exemption of PACER fees, and a waiver of the additional paper copy requirement for electronically filed pleadings, Plaintiff Meghan Kelly's Motion for remote proceedings or to appear remotely, Plaintiff's Motion for a Temporary Restraining Order and exemption of bond, Plaintiff's Memorandum of Law in support of her Motion for a temporary restraining order and exemption of bond, Plaintiff's motion for a preliminary order and exemption of bond, Plaintiff's Motion to Expedite, Plaintiff's Memorandum of law in support of Plaintiff's motion for a preliminary injunction and exemption from bond, and motion to expedite*, filed on or about October 25, 2021, with Defendants to include the additional Defendants herein by reference, against Defendants Disciplinary Counsel Patricia B. Swartz, Chief Disciplinary Counsel, David A. White, Disciplinary, Counsel Kathleen M. Vavala, the Office of Disciplinary Counsel, Board of Professional Responsibility for the Supreme Court of Delaware, Delaware Supreme Court, a.k.a., Supreme, Court State of Delaware, Justice Gary F. Traynor, Justice Karen L. Valihura, Chief, Justice Collins J. Seitz, Jr., Justice James T. Vaughn, Jr., Justice Tamika R. Montgomery-Reeves and Delaware Attorney General Kathleen Jennings, in her capacity as the Attorney General for the State of Delaware (collectively, "defendants"), and states as follows:

**THE PARTIES**

1. Pro se, unrepresented Plaintiff, party, not acting as an attorney advocate, Meghan Kelly (also referred herein as, "Meghan," "Plaintiff," "I," or "me," or "my" or

"myself" also "she" and "her" and "Plaintiff") am an adult resident of the state of Delaware, residing at 34012 Shawnee Drive, Dagsboro, DE 19939.

2. Defendant Disciplinary Counsel Patricia B. Swartz ("Patricia," and individually and collectively with one or the more Disciplinary counsel or their agent, Disciplinary Counsel Kathleen M. Vavala, and Chief Disciplinary Counsel David White referred to as "ODC"), is a Delaware resident. This case is brought against her in her individual capacity and professional capacity, pursuant to Ex Parte Young analysis, exceeding Constitutional authority by displaying disparate treatment towards me, but for my exercise and assertion of fundamental rights in violation of the Equal Protections Clause applied to the ODC pursuant to the 14th Amendment, and other federal and Constitutional laws discussed herein. Her place of business as Disciplinary Counsel is located at the Office of Disciplinary Counsel, The Renaissance Centre, 405 N. King Street, Suite 420, Wilmington, DE 19801. She may be served at her place of business.

3. Defendant Disciplinary Counsel Kathleen M. Vavala, ("ODC") is a Delaware resident. This case is brought against her in her individual capacity and professional capacity, pursuant to Ex Parte Young, exceeding Constitutional authority by displaying disparate treatment towards me, but for my exercise and assertion of my fundamental rights in violation of the Equal Protections Clause applied to the ODC pursuant to the Fourteenth Amendment, and other federal and Constitutional laws discussed herein. Her place of business is located at the Office of Disciplinary Counsel, The Renaissance Centre, 405 N. King Street, Suite 420, Wilmington, DE 19801. She may be served at her place of business.

4. Defendant Chief Disciplinary Counsel David White, (ODC”), is a Delaware resident. This case is brought against him in his individual capacity and professional capacity, pursuant to Ex Parte Young analysis, exceeding Constitutional authority by displaying disparate treatment towards me, but for my exercise and assertion of fundamental rights in violation of the Equal Protections Clause applied to the ODC pursuant to the Fourteenth Amendment, and other federal and Constitutional laws discussed herein. His place of business is located at the Office of Disciplinary Counsel, The Renaissance Centre, 405 N. King Street, Suite 420, Wilmington, DE 19801. He may be served at her place of business.

5. Delaware Supreme Court, a.k.a. Supreme Court state of Delaware (“Court”) is a Delaware government entity who may be served at 55 The Green, Dover, DE 19901.

6. Justice Gary F. Traynor (also referred to as “Justice Traynor,” also referred herein individually or collectively with other members or agents of the Delaware Supreme Court as the “Court”), is a Delaware Supreme Court judge whose place of business is located at 55 The Green, Dover, DE 19901. This case is brought against him in his individual capacity and professional capacity, pursuant to Ex Parte Young analysis, exceeding Constitutional authority by displaying disparate treatment towards me, but for my exercise and assertion of fundamental rights in violation of the Equal Protections Clause applied to the Court pursuant to the 14th Amendment, and other federal and Constitutional laws discussed herein.

7. Justice Karen L. Valihura, (also referred to as “Justice Valihura” also referred herein individually or collectively with other members or agents of the Delaware

Supreme Court as the “Court”), is a Delaware Supreme Court judge and may be served at 55 The Green, Dover, DE 19901. This case is brought against her in her individual capacity and professional capacity, pursuant to Ex Parte Young analysis, exceeding Constitutional authority by displaying disparate treatment towards me, but for my exercise and assertion of fundamental rights in violation of the Equal Protections Clause applied to the Court pursuant to the 14th Amendment, and other federal and Constitutional laws discussed herein.

8. Chief Justice Collins J. Seitz, Jr. (also referred to as “Chief Justice or Justice Seitz” also referred herein individually or collectively with other members or agents of the Delaware Supreme Court as the “Court”), is a Delaware Supreme Court judge and may be served at 55 The Green, Dover, DE 19901. This case is brought against her in her individual capacity and professional capacity, pursuant to Ex Parte Young analysis, exceeding Constitutional authority by displaying disparate treatment towards me, but for my exercise and assertion of fundamental rights in violation of the Equal Protections Clause applied to the Court pursuant to the 14th Amendment, and other federal and Constitutional laws discussed herein.

9. Justice James T. Vaughn, Jr. (also referred to as “Justice Vaughn” also referred herein individually or collectively with other members or agents of the Delaware Supreme Court as the “Court”) is a Delaware Supreme Court judge and may be served at 55 The Green, Dover, DE 19901. This case is brought against him in his individual capacity and professional capacity, pursuant to Ex Parte Young analysis, exceeding Constitutional authority by displaying disparate treatment towards me, but for my exercise and assertion of fundamental rights in violation of the Equal Protections Clause



applied to the Court pursuant to the 14th Amendment, and other federal and Constitutional laws discussed herein.

10. Justice Tamika R. Montgomery-Reeves (also referred to as “Justice Montgomery-Reeves” also referred herein individually or collectively with other members or agents of the Delaware Supreme Court as the “Court”) is a Delaware Supreme Court judge and may be served at 55 The Green, Dover, DE 19901. This case is brought against her in her individual capacity and professional capacity, pursuant to Ex Parte Young analysis, exceeding Constitutional authority by displaying disparate treatment towards me, but for my exercise and assertion of fundamental rights in violation of the Equal Protections Clause applied to the Court pursuant to the 14th Amendment, and other federal and Constitutional laws discussed herein.

11. The Office of Disciplinary Counsel (“ODC” individually and collectively with the above referenced Defendants) is a Delaware organization so tied to the state of Delaware. It is considered an arm of the court, and a state agency whose place of business is at The Renaissance Centre, 405 North King Street, Suite 420, Wilmington, Delaware 19801. This case is brought against her in her individual capacity and professional capacity, pursuant to Ex Parte Young analysis, exceeding Constitutional authority by displaying disparate treatment towards me, but for my exercise and assertion of fundamental rights in violation of the Equal Protections Clause applied to the Court pursuant to the 14th Amendment, and other federal and Constitutional laws discussed herein.

12. Board of Professional Responsibility for the Supreme Court of Delaware (“Board”) is an organization tied to the state of Delaware. It is considered an arm of the

court, and a state agency who may be served at The Renaissance Centre, 405 North King Street, Suite 507, Wilmington, Delaware 19801.

13. Defendant Delaware Attorney General Kathleen Jennings, in her capacity as the Attorney General for the State of Delaware, whose place of business is located at Delaware Department of Justice, Carvel State Building 820 N. French St., Wilmington, DE 19801. She may be served at Delaware Department of Justice, Carvel State Building 820 N. French St., Wilmington, DE 19801.

### **JURISDICTION**

14. Under 28 U.S. Code § 1331 & 1343, this Court has subject matter jurisdiction because this action arises under the Constitution and laws of the United States relating to civil rights.

15. Venue is proper because a substantial part of the events giving rise to the claims occurred in this district, all of the Defendants are residents of Delaware in which the district is located and Defendants are Delaware government agents, Delaware entities or Delaware residents, performing business or government services in the State of Delaware.

16. Defendants regularly conduct government business or government services in this state of Delaware.

17. My claims against Defendants arise from Defendants' acting under the color of government authority in the state of Delaware, specifically "under color of statute, ordinance, regulation, custom, or usage, of [the] State [of Delaware subjecting me, or causing me to be subjected] to the deprivation of "rights, privileges, or immunities secured by the Constitution and laws" including my First Amendment rights, and my

license to practice law, in violation of 42 U.S.C. § 1983, and in retaliation for my First Amendment exercise applicable to the Defendants pursuant to the Fourteenth Amendment right to petition the Chancery Court, the Delaware Supreme Court, the United States Supreme Court, and the Board of Professional Responsibility to seek to petition for protection for the exercise of my fundamental right to a fair, impartial proceedings, opportunity to prepare and present a defense, opportunity to perform discovery, opportunity to cross examine witnesses, sufficient notice, substantive and procedural due process rights under the Fourteenth Amendment, exercise of free speech, religious belief, association, and the right to petition, and separately the right to petition, as an impoverished citizen of the United States with limited resources to plead my case, as a party with an active license to practice law defending my personal liberties, as an unrepresented party, not acting as an attorney advocate on behalf of another, as a Christian with personal religious beliefs, as a Christian-democrat, as a Catholic, as a Democrat, as a citizen with unique personal beliefs that do not conform to the world's trained, conditioned, compelled beliefs.

18. The conduct in issue arises in Delaware.

### **FACTS**

#### **BACKGROUND, HARM TO MEGHAN KELLY**

19. I brought this law suit pursuant to 42 USCS §§§ 1983, 1985 and 1988 for injunctive relief, declaratory relief, nominal damages, damages for infliction of emotional distress, other equitable relief, including a possible writ of mandamus, including relief pursuant to FRCP R. 65 to enjoin proceedings brought by the Defendants to place my attorney license on inactive disabled, in violation of the First Amendment Applicable to

the Defendants pursuant to the Fourteenth Amendment in retaliation of my exercise of my fundamental right to petition, speak, freely exercise my religious beliefs and association, for malicious purposes based on harming my reputation, to make my speech chilled in the public's views, to harm my character, and to suppress, interfere, obstruct, impede my exercise of religion, speech, association, and right to petition, as a party, and to conceal misconduct within the Court system in my case, or to seek to protect the Court's reputation at the cost of eliminating my individual liberties, and in conspiracy to interfere, impede, or obstruct my separate lawsuit, *Kelly v Trump*, and for disparate treatment against me in a state proceeding based on the state's disdain for my religious beliefs in violation of the Equal Protections clause applicable to the Defendants pursuant to the Fourteenth Amendment, violations of the 6<sup>th</sup> Amend. by refusal of the state to allow me to cross examine my accusers and necessary defendants in the proceeding before the Board and Court, deprivation of adequate notice, denial of opportunity to prepare and present a defense, research.

20. This United States District Court case arises upon actions by state government agents taken, under the color of state authority and color of law, statute or regulation, to retaliate, and to unlawfully pressure Plaintiff to forgo her case, or to impede or obstruct my access to the courts in a civil rights lawsuit, *Kelly v Trump*, Case Number 21, 5522 in the US Supreme Court, Case Number 119, 2021 before the Delaware Supreme Court, and Case Number 2020-0809 before the Chancery Court for the state of Delaware (referred herein as "*Kelly v Trump*"), where I am seeking relief to protect my free exercise of religion, speech and association without government sponsored economic, social or physical persecution, substantially burdening such exercise. Attached, please find

documents I filed with the United States Supreme Court, Case Number 21-5522, as US Exhibit, to be incorporated herein in toto pursuant to the Federal Rules of Civil Procedure, Rule 10 (c), and referred herein as “US Ex” with reference to documents herein, identified by the marked exhibit letter or number therein with the term (“US Ex”), and the named Exhibit therein. Also attached, please find the Exhibit labeled “Us Exhibit Appendix Table of Contents,” which outlines each of the exhibits in US Exhibit.

21. I brought this law suit to enjoin proceedings brought by Defendants’ Conspiracy to interfere with a party, me, and my civil rights pursuant to 42 U.S.C. § 1985 (2)(b), where Defendants seek to place my attorney license on inactive disabled, to obstruct justice in *Kelly v Trump* and to punish me, impede my case from going forward or to suppress or discredit my religious beliefs, speech, prevent my continued petition before the Chancery Court and, or the United States Supreme Court, and to seek relief from the Defendants’ interference of my exercise of my First Amendment rights, including the my right to seek the protection of the court by petitioning the court for relief, my exercise of speech, religious beliefs and association (individually and collectively, these four rights also referred herein as “civil rights,”) in violation of the First Amendment applicable to the Defendants pursuant to the Fourteenth Amendment, and to prevent punishment from the Defendants for the exercise of my speech, religion, and association which Defendants seek to suppress or discredit by disparaging me as “inactive disabled” in an official proceeding, *Kelly v Trump*.

22. The Supreme Court incited, participated or caused the unlawful retaliatory state Court proceeding and the Delaware Supreme Court arms’ interference in my lawsuit *Kelly v Trump* on violation of 42 USC Section 1985(2).

23. A complaint was made apparently by the Supreme Court or its agent based on my petition for relief from attorney dues to the arm's of the Court. De-Lapp, an arm of the state court, would never have attacked me, but for this petition relating to lawyer license dues, per their own admission.

24. The Delaware Supreme Court did not grant my petition, and ignored my second petition relating to attorney dues, deeming me unworthy of the opportunity to be heard on my second petition for relief from attorney dues, in potential violation of the substantive and procedural due process clause, and in violation of the Equal Protections Clause of the 14th Amend. as applied to me, a party of one, for disparate treatment motivated by my poverty, religious beliefs or exercise of fundamental rights.

25. The entire Supreme Court members may have reviewed or discussed my request to suspend active attorney license registration fees for lawyers facing economic hardship during the pandemic, and my second request for relief relating to attorney license registration fees.

26. De-Lapp, an arm of the court, expressly stated the reason they sought to investigate me, in interference with my active case, is because they discovered I sought relief relating to lawyer licensure fees.

27. DE-Lapp not going to help me pay the fees, because I already paid the fees.

28. DE-Lapp sought to gather evidence against me to punish me for my exercise of fundamental rights, including the right to petition the court regarding attorney dues, and to sue the President concerning a substantial burden upon my free exercise of religion.

29. It appears the Delaware Supreme Court justices or agents incited the arms

to attack me by providing the information to DE-Lapp. I made a request for Chief Justice Collins J. Seitz, Jr. to recuse himself. So he did not participate in *Kelly v Trump*.

30. Three Delaware Supreme Court Justices participated in the matter which is an admitted source of Defendants' petition against me *Kelly v Trump*, Justices, Vaughn, Traynor and Montgomery-Reeves.

31. The Delaware Supreme Court appeared to incite the unlawful proceeding against me in state Court by its arms, brought to punish me, but for, my exercise of Constitutional rights.

32. The members of the Delaware Supreme Court are material witnesses to the facts relating to my case and the petition against me.

33. The Sussex County law librarian was granted PACER access by the Delaware Supreme Court which is suspicious, evidence the Delaware Supreme Court is preparing a case against me.

34. Justice Traynor also came into the law library looking for federal jury instructions, I believe to prepare someone to sue me in federal court, which if it is true, makes a fair trial impossible in the Delaware Supreme Court.

35. The state Court and the Board are without jurisdiction to hear my grievances for equitable relief, nominal damages and damages relating to this unlawfully brought petition.

36. I did not receive proper notice of the state hearing, moved to postpone the hearing, and requested an opportunity to conduct discovery to show the cause of action is illegal and to show the state does not have subject matter jurisdiction against me. The Defendants denied by requests, and ignored my objections.

37. The State brought a petition against me for my faith in Jesus Christ.

Defendants appear to think my worship of God instead of money and material gain is a mental disability. Jesus says you cannot serve God and money. I believe people go to hell for organized charity, pro bono, fundraising, forcing individuals to work as discipline in violation of the 13<sup>th</sup> Amend., and **blindly** doing what they are told at a job for money to care for their family, while not caring to **see clearly to love God** as God, instead of money as savior and God, and not caring to **see clearly** to love others, by understanding how their product or service may harm others God loves.<sup>1</sup> I believe experts are rendered above the law by adherence to controlled conformity across the board which stifles improvements by freedom of thought and speech, hindered by libel laws, and defense of adherence to professional standards, delegation of duties or ignorance. I believe, fundraising, donations and government funding controls and limits what alleged experts learn, to serve lawless business greed not good, untamed by the rule of law or God's law of love. Our libel laws prevent free speech, debate and criticism to serve business greed. (D.I.4 at Ex 54 to F). Defendants allege my belief in Jesus Christ is illogical, and compel me to conform to the world, when I am commanded to be set apart, holy, or risk losing my ability to "buy and sell" by taking my license to work as an attorney.<sup>2</sup>

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<sup>1</sup> See, D.I. US Ex., App E, Ex A-4, A-5, App. F, Ex. A, 1-8, 43, 46, 48, 50, 51, to App F, App H (Emphasis intended, See, *Jn.* 12:40, *Lk.* 11:34)

<sup>2</sup> *Rev.* 13:17, *Ro.* 12:2, *Nu.* 23:9, *Heb* 12:14. Work is not the sin. When your desire for money drives out your love for God and one another, at the cost of human sacrifice, harming others to serve greed, that is sin. The Free exercise Clause permits me to worship or not according to the dictates of my conscience no matter how unreasonable my religious beliefs may be to the state, not the forced worship of business greed, money and material gain by barter or exchange.



38. On Oct. 25, 2021, I filed a Complaint, and various motions with the District Court based on the arm's of the Delaware Supreme Court and its agents' or coconspirators interference with *Kelly v Trump* and retaliation against me for my exercise of Constitutionally protected activity under 42§§§ 1985(2), 1983, and 1988, including retaliation against me by seeking to disbar me for petitioning the Courts to remove a substantial burden upon my free exercise of religion under RFRA against the President for the establishment of government religion, established by inter alias executive orders that join the state and religion by partnerships through pay through barter or exchange under the deception of charity to perform government-religious business, and two petitions relating to my request for relief on attorney license dues. I sued the President to abolish executive orders that pay churches to perform government business under the guise of charity. It is business, not unconditional charitable love. This is a step to eliminate governments' function of welfare, eliminating social security and other government welfare programs, allowing lawless greed to reign by entities without hearts who have no power to do good, as individual humans may through unconditional love. These entities, will not be tamed with just laws or the law of love written on the hearts of man, should the Courts not prevent or reverse the global schemes. I read the plans the Fourth Industrial Revolution and the Great Reset. (D.I. 9 at Ex. 6, 8, 9). There is a plan through unjust policies to eliminate private property and make everything and everyone no longer free, but for sale to be rented out. Id. Schemes may be undone by the Courts before the courts governing power is eliminated by design through privatization and automation. The Court is my hope of a hero.

39. The Delaware Supreme Court is an improper forum to determine whether

the Defendants conduct against me is unlawful as a matter of law under the procedural and substantive Due process clause pursuant to the state actors and entities via the 14th Amend. and under 42 USC §§§ 1985(2), 1983, and 1988, the Equal Protections Clause for disparate treatment, and the 1st Amend. applicable to the state via the 14th Amend., and arguably 28 U.S.C.A. 605, and analyzing a full and fair opportunity to be heard by considering the analysis of (28 USCS §§ 455 (b)(1), 455(b)(5)(iv)).

40. The District Court dismissed my initial complaint on or about November 2, 2021.

41. On or about November 3, 2020, the Preliminary Review Committee met and determined a petition may be brought by Defendants against my person relating to my case *Kelly v Trump*. Defendant indicated her desire to appoint counsel. I objected on religious and economic grounds. Despite my objection she requested appointed counsel with the Delaware Supreme Court. I filed a letter indicating I would object to appointed counsel, and another letter providing notice that I will object to the Supreme Court's subject matter jurisdiction.

42. On Fri., Dec. 10, 2021, the Board signed a notice of a hearing. I was not provided proper notice on Dec.10, 2021.

43. On Mon., Dec. 13, 2021, the Defendants appointed counsel despite having notice of my religious objections to counsel, causing great emotional distress, and requiring me to file pleadings with the Defendants to seek my right to self-represent under the 6th Amendment.

44. The Defendants knew emotional distress would result, and distress so resulted. I was so shaken up, trembling at the post office, as I filed pleadings to assert my

right to self-representation, the postal worker called the police to make a wellness check.

45. I gave my life to God not to man to exploit for material gain. God is the purpose of my life. Yet the Defendants sought to force me to violate my beliefs to defend my exercise of religious beliefs, in violation of my First Amendment right to freely exercise my religious beliefs without government compelled violations by appointment of an attorney and by examination of mental health or health experts.

46. On Thur., Dec.16, 2021, I received a letter regarding the appointment.

47. On Fri., Dec. 17, 2021, counsel contacted me. I immediately indicated my objection to his appointment.

48. On Sat., Dec. 18, 2021, I filed the attached letter with the Board objecting to improper service, requiring a postponement on the hearing so I may be afforded discovery, and a decision on counsel, and notice that I intended to file a motion with the Delaware Supreme Court on Monday.

49. On Mon., Dec. 20, 2021, I filed *Respondent's Motion for reconsideration of order dated December 13, 2021, appointing counsel despite my notice of intent to object, and objection of improper service of the Board's Notice of Hearing, dated December 10, 2021*, with the Delaware Supreme Court, with a copy to Defendant, and the Board, albeit the Board's copy was mailed Dec.21, 2021.

50. On Dec. 21, 2021, I filed the attached letter with the Court rejecting appointment of counsel.

51. Appointed Counsel moved to terminate his appointment on Dec. 23, 2021.

52. On Dec. 29, 2021, I filed a letter motion with the Court to inter alias object to counsel on 6th Amend. Grounds and postpone the hearing in the interest of justice.

53. On December 30, 2021, the Court excused counsel. I filed papers indicating I objected to improper service of notice, and the Board did not resend the notice to me via mail until 19 days before the hearing, violating the procedural rules of permitting 20 days of proper notice. Meantime, it was not until two weeks before the hearing the court granted me to self-representation.

54. Defendants knew appointment of counsel violated my religious beliefs. Defendants failed to provide proper notice of a hearing, and did not respond to my request for an extension of time.

55. On Thur., Jan. 6, 2022, I E-mailed the Board and Patricia Swartz to check on the status of my request to delay the hearing in order to be afforded a fair opportunity to perform discovery to gather evidence to show the Board it does not have subject matter jurisdiction.

56. Prior to that date, filed a motion dated December 31, 2021, objecting to healthcare and mental healthcare examinations, and noted my intent of filing a protective order.

57. I fell ill with the shingles, I painfully noticed in early January and allergies. I had additional issues interfering with my opportunity to prepare and build a defense, including vulture issues, including my new computer stopped working, and I had to drive to the law library to use the phone for assistance.

58. The Federal government agreed to help me with the vultures at no charge.

59. Defendants cared not about my health or my opportunity to prepare to afford me a fair proceeding.

60. Defendant Board failed to allow me to be heard on two outstanding

motions, in contravention to the Procedural and Substantive Due Process requirements under the 14th Amend., and based on disparate treatment in violation of the Equal Protections grounds motivated by disdain for my religious-associated beliefs or poverty, demeaning me as unworthy of being heard, one served December 18, 2021 via US Mail, requesting suspension of the hearing due 1. to ineffective service, and, 2. Requesting a suspension of hearing date until, a final determination is made on counsel, and 3. Until discovery is complete, to allow time and opportunity for me to prepare a defense, and the second outstanding motion served via US mail on 12/31/21, with courtesy copy emailed to the Board and Patricia Swartz regarding Respondent Meghan M. Kelly's objection to and motion to enjoin expert observation and analysis of respondent at hearings and discovery; notice she will move for a protective order during the discovery stage; and requests to prevent costs as going into debt is against her religious beliefs. (Ex. B, Ex C).

61. On December 29, 2021, I also served a letter with exhibits with both the Delaware Supreme Court and Defendant Board notifying them,

“The hearing is two weeks away, no determination has been made by the Court on my exercise of self-representation under the 6th amendment, and on religious grounds, and on my request to postpone the hearing so I may perform discovery to adequately defend my exercise of Constitutionally protected activity which is the subject of this petition, per the state's admission. (Emphasis Intended), (Citing M1 at Ex J page 1, and at internal-Ex A part 2 and Petition at 7).

62. On the afternoon of 12/30/21, two weeks prior to the original hearing date, the State Court granted me permission to represent myself, after fighting for the right to do so since I discovered counsel was appointed. (emphasis intended).

63. I have not been afforded a fair opportunity to prepare a defense, research, gather evidence, and facts and file motions I noticed the Board and Court I intended to

file, after a fair investigation was allowed in conformity with the standards of Constitutional due process, 1. to dismiss the petition based on illegality of proceeding and 2. a separate motion to dismiss based on lack of subject matter jurisdiction due to the Supreme Court's participation in inciting the petition against me, but for the exercise of my Constitutionally protected rights.

64. I repeatedly, checked on the status of my motion to postpone the hearing, and opportunity to prepare a defense, and only heard back on January 10, 2022. The Board indicated the hearing was on schedule for January 13, 2022.

65. On January 11, 2022, I filed Respondent Meghan M. Kelly's Emergency Objections and Emergency Motion filed with both the Board of Professional Responsibility for the Supreme Court of Delaware, and the Delaware Supreme Court, simultaneously, to postpone the hearing against me to prevent manifest injustice to afford me an opportunity to perform discovery, potentially call witnesses and prepare a defense for the state's allegedly illegally motivated petition against me for my exercise of fundamental rights, motivated by the state's disdain for my religious political beliefs, dated 1/11/22. (Ex D incorporated in total)

66. I motioned both the Delaware Supreme Court and the Board, simultaneously, on 1/11/22 since the trial against me was scheduled 1/13/22, days away, despite the fact I did not receive proper notice of the hearing, moved to postpone the hearing, requested updates on receipt which were not timely addressed by the Board, and requested an opportunity to conduct discovery to show the cause of action is illegal and to show the state does not have subject matter jurisdiction against me.

67. On 1/11/22, the Delaware Supreme Court swiftly granted an order denying

relief based on jurisdiction. (Ex. E Internal-Ex. B).

68. While I was grateful for the swift determination of this Court, I am concerned by the Court's footnote 2, noting "Procedures and hearings for proceedings to determine incapacity are conducted in the same manner as disciplinary proceedings." Id. By the Court's reference to a different proceeding conducted in the same manner as this disciplinary proceeding, it appears my life and liberty are at stake in this case. Id. I am scared the court, the Delaware Supreme Court, may seek to put me away for my religious beliefs in a separate proceeding noted in the order.

69. My belief in Jesus is not a mental disability, nor is my poverty. Caring for God and caring for others as myself is not a disability. I must not be punished for the exercise Constitutional rights merely because the State does not agree or understand my religious thinking and religious beliefs.

70. On 1/11/22, the Board granted an order postponing the hearing for eight days due to alleged illness, a reason not included in my motion. The Board was aware I was not feeling well when I immediately notified them, I was not feeling well, a week earlier.

71. Illness was not a reason I included in my motion. I informed the Defendants I was not feeling well to look after the health and lives of my opponents, and my own life, with love, during a global pandemic, where millions are dying. (Ex E)

72. I notified the Board and ODC of my opposition to examination by health or mental health professionals based on religious objections in my Answer to the petition, and through E-mail, despite the ODC seeking to tempt me to include such an argument in a motion.

73. The board was aware of obstacles I was facing, and the stress Defendants caused me by their desire to rush a proceeding, which required I act swiftly to object to running on empty or waive fundamental rights.

74. Despite having knowledge, I have been under the weather, needed time to research, perform discovery, and prepare a defense, including the defense of lack of subject matter jurisdiction, and illegality of proceeding, as applied, was not heard on outstanding motions, including a motion served on 12/18/22 via mail to postpone the hearing for opportunity to perform discovery and to file motions, and a motion relation to my religious objections against being observed or examined by a health or mental health professional served via US mail, courtesy copy to the Board and ODC via E-mail on 12/31/22 , and desired to file additional motions, including a motion to dismiss based on lack of subject matter after collecting evidence for clarity, the Board denied rendering an order on my 12/18/21 motion to postpone the hearing. Instead, the Board did not respond to previous week's status update requests, or the Dec. 2021 status of receipt and update requests. The Defendants ignored, and did not afford me an opportunity to be heard on past motions in violation of the substantive and procedural due process clause, and possibly in violation of the equal protections clause as applied to me, by treating me disparately based on religious beliefs, in contravention to the norms of a fair proceeding.

75. On 1/12/22, I appealed the Board's Order by filing Respondent Meghan M. Kelly's Motion Appealing the Order of the Board on Professional Responsibility of the Supreme Court of the State of Delaware dated, January 11, 2022, granting postponement of the hearing for 8 days due to illness, not a reason identified in her motion to grant postponement to afford her opportunity to prepare a defense, perform discovery, research,



file motions, be heard on outstanding motion(s) unaddressed by the Board, to defend her exercise of fundamental rights and to preserve her license to practice law, on the grounds the amount of time is not enough and a hearing date should be postponed until after a fair opportunity to build a defense, dated January 12, 2021. (Ex. E incorporated herein in total).

76. On 1/13/22, I filed a motion for the state Court to make an immediate emergency determination on my motion to appeal. (Ex. G, internal Ex. F)

77. On 1/14/22, Defendant attempted to provide a response to the December 18, 2022 Motion served December 21, 2022 beyond 20 days allowed, when the issue was already determined by the Board by the 1/11/22 order, to harass me and distract me from preparation when I already indicated to the Board and Court, I do not have enough time to research or prepare a defense.

78. The Defendants assert I have an opportunity to call witnesses, despite only having an order allowing me to represent myself granted on December 30, 2021, with no time permitted to date for discovery, and no time allowed to issue subpoenas in contravention of the Substantive and Procedural Due Process and Equal protections Clause as applied to me.

79. So, on January 15, 2022, I made a motion, once again to suspend the hearing date, to call witnesses, and perform discovery for my defense of exercise of fundamental rights without the state's punishment for my exercise. I have the right to believe, think and exercise my faith differently than the majority. Individual liberties, such as my right to an impartial proceeding, an opportunity to be heard, adequate notice, opportunity to perform research and a defense without disparate unfair treatment,

motivated by the state's disdain for my religious beliefs, are protected by Constitutional Law from government backed mob reign of controlled, conditional, conformed lusts. I am not sitting on this, but am acting in haste to protect and assert my Constitutional rights to prevent waiver.

80. On January 15, 2022, I filed a motion for immediate emergency relief, and a new motion with the Board, attached hereto, and incorporated herein in total, Respondent's more particularized motion to suspend the hearing, scheduled for January 21, 2022 to allow me opportunity to research and prepare a defense, requesting opportunity to draft requests for admission, interrogatories and subpoena opposing counsel, Patricia Swartz, as a necessary witness in her defense, and subpoena other necessary witnesses, including but not limited to, Chief Justice Collins J. Seitz, Judge Kenneth S. Clark, Jr., due to his admission he interrogated me based on my exercise of fundamental rights incited by the ODC, and Arline Simmons, to show unconstitutional motive for this petition, to allow, the accused, respondent an opportunity to defend herself on the defense illegality of proceeding, as applied to her, motivated by disdain by the state for her religious associated beliefs and exercise of fundamental rights, and lack of jurisdiction based on the Delaware Supreme Court's apparent participation in inciting this petition against respondent.

81. I informed Defendants I was not ready, and needed time to prepare a defense, to subpoena witnesses, to perform legal research and to draft motions based on additional facts found in discovery. The Defendants denied me a fair opportunity to build my defense, despite my multiple requests in contravention of conformity with the requirements of a fair proceeding under the Due Process Clause. There is no legitimate

or important reason for Defendants to rush this matter at the cost of eliminating my right to an opportunity to prepare a defense and at the cost of creating an unfair proceeding in violation of the substantive and procedural Due Process Clause and the Equal Protections Clause of the 14th Amend.

82. The Defendants denied me of the opportunity to call witnesses, gather facts, research and present evidence for a defense against me to protect my life and liberty, against state punishment for the exercise of First Amendment rights.

83. I suffered irreparable harm, in violation of the substantive and procedural due process clause and Equal Protections clause. I was unable to gather testimony and additional research and facts to provide a defense of dismissal of the petition, based on subject matter and illegality of proceeding, as applied, under the facts of the case, substantially burdening my exercise of my fundamental rights, thereby substantially burdening the rights of others by such unconstitutional precedent. ‘

84. The Defendants may have power, but it does not have the power to act above the law, above the Constitution. Even I, an accused Christian am afforded Constitutional rights, including but not limited to the right for a fair and impartial proceeding, right for an opportunity to prepare a defense, right to be heard, right to notice, right to free speech, association, religious exercise, and the fundamental right to petition the courts for relief, without interference and disparate retaliation against me from the state but for my exercise of fundamental rights. I asserted my rights and made objections. Defendants have not met the burden of strict scrutiny to infringe upon my exercise and assertion of Constitutional rights.

85. The right for the opportunity at justice is not a guarantee. It is the right to

petition the Courts, without state punishment, that must be protected. Otherwise, only the Courts may selectively apply who has rights or not in violation of the Equal Protections Clause.

86. Courts are a government service of the people, created to govern and guide not control, not exploit people for the bottom line. The government does not run on money.

87. The government runs on individual free choice, the collective free choice of the many who agree to respect the Constitutional laws' protections of all people regardless of race, religion, poverty, gender, age or place of association. When individuals within government no longer respect the Constitutional laws that make us free by limiting their government power, we are no longer a free people, but a for sale enslaved people in violation of the 13th Amend.

88. The Free exercise of speech, association, right to petition, and religious exercise, and freedom of conscience have not been sold, making it not a freedom, but a bargaining chip to exchange by relinquishment to serve business greed.

89. I have not sold my soul to hell, or exchanged my Constitutional rights in exchange with the license to practice law.

90. Defendants are not permitted to take away or deactivate my license to practice law in response to disagreeing with my exercise of fundamental rights, namely my religious beliefs.

91. Despite having knowledge, I have been under the weather, needed time to file to perform discovery, and prepare a defense, was not heard on outstanding motions, including a motion served on 12/18/22 via mail to postpone the hearing for opportunity to

perform discovery and to file motions, and a motion relation to my religious objections against being observed or examined by a health or mental health professional served via US mail, courtesy copy to the Board and ODC via E-mail on 12/31/22 , and desired to file additional motions, including a motion to dismiss based on lack of subject matter after collecting evidence for clarity, the Board denied rendering an order on my 12/18/21 motion to postpone the hearing. Instead, the Board did not respond to last week's status update requests, or the Dec. 2021 status of receipt and update requests. They ignored, and did not afford me an opportunity to be heard on past motions in violation of the substantive and procedural due process clause, and possibly in violation of the equal protections clause as applied to me, by treating me disparately based on religious beliefs, in contravention to the norms of a fair proceeding.

92. I notified the Board and ODC of my opposition to examination by health or mental health professionals based on religious objections in my Answer to the petition, and through E-mail, despite the ODC seeking to tempt me to include such an argument in a motion.

93. Illness was not a reason I included in my motion. I have a duty to look after the health and lives of my opponents, with love, during a pandemic too. I do not want the ODC to get sick or die, should I fall ill. (Ex J)

94. I want Defendants to have softer hearts of love, not acting as cold hearted machines going through the motions, without true power to render justice with mercy to correct, to prevent harm and condemnation, as only individual people may choose to do beyond the letter of the law, written on their hearts, so she may have eternal life. *Jeremiah* 31.

95. I think there is a plan to increasingly automate the law, especially real estate, to reduce the power of individual justices, to possibly eliminate judges' governing and guiding authority down the line. Judges are more powerful than the court and are what holds the court together, not money.

96. Judges are special in that they have the power to reflect the image of God by unconditional love by their independent thinking and choice. Machines cannot do that. The judges must not be conformed, controlled, conditioned by the dependent thoughts of others within the two other branches. They must remain impartial in order to place checks on the other two branches should they overstep Constitutional authority. Judges are powerful, not powerless.

97. One asserted reason for time for discovery was to investigate whether my exercise of Constitutionally protective activity, running for office, filing a law suit to run for office without compelled violations of my religious beliefs by asking for signatures and money to pay for the right, no longer free, is an impermissible reason for the State's petition against me.

98. On January 15, 2022, I filed a *Motion for an Immediate Emergency Determination, pursuant to the Substantive and Procedural Due Process Clause and the Equal Protections Clause applicable to the state pursuant to the 14th Amend., and the 1st Amend. applicable to the state pursuant to the 14th Amend., and Del. Lawyer's R. Disciplinary Proc. 2 (c) brings this motion, simultaneously with a motion for immediate relief to suspend the hearing, scheduled for January 21, 2022 to allow me opportunity to research and prepare a defense, requesting opportunity to draft requests for admission, interrogatories and subpoena opposing counsel, Patricia Swartz, as a necessary witness*

*in her defense, and subpoena other necessary witnesses, including but not limited to, Chief Justice Collins J. Seitz, Judge Kenneth S. Clark, Jr., due to his admission he interrogated me based on my exercise of fundamental rights incited by the ODC, and Arline Simmons, to show unconstitutional motive for this petition, to allow, the accused, respondent an opportunity to defend herself on the defense illegality of proceeding, as applied to her, motivated by disdain by the state for her religious associated beliefs and exercise of fundamental rights, and lack of jurisdiction based on the Delaware Supreme Court's apparent participation in inciting this petition against respondent.*

99. I attempted to cancel the hearing to protect my health, life and liberty, but was compelled to attend to appear specially to object on subject matter grounds.

100. It was cruel and unusual punishment to compel me to testify when Defendants knew I was sleep deprived and have been under the weather for weeks.

101. I was a bit discombobulated and reasonably upset at such disparate heartless treatment by the board motivated by disdain of my exercise of fundamental rights.

102. I do not recall when I got a new computer. When ever I receive help from my parents my mother sometimes says it is for Christmas or my birthday. Since, the date I got it was not officially that date by my recollection, I attempted to correct myself during the hearing because I do not know when I got the computer or new phone. I am living day to day, looking forward not back to defend my life and liberty from government persecution, but for my faith in Jesus and exercise of fundamental rights. Little things such as dates are nothing to me compared to potential loss of my soul to hell by the government's potential order forcing me to violate my religious beliefs.

103. I did not perform well. Though I tried to show the importance of allowing me to maintain my active license and to maintain my free speech from being demeaned and chilled by insulting language from the Defendants by showing how President Trump's establishment of government religion increased attacks against perceived outsiders based on race, religion or orientation.

104. My Father, the legendary Pat Kelly, reduced racism and made the right thing look cool as a life guard, civics teacher and basketball coach in Sussex County, Delaware. I fear I made a bad impression at the hearing by talking about the kkk attacks at my former high school, IR where white children gave black children bracelets with the nazi symbol in response to the black life matters movement.

105. I should not have alluded to that, as it made me more upset, and made me think about the racist school bus incident at Cape Henlopen School District, another Sussex County school District, and the noose incident in a middle Delaware school incident. I am unable to think and speak and present as clearly with little sleep because I human and deserve to be recognized with dignity from the courts. My father and mother moved away, and my dad's influence of eliminating racism by making the right thing look cool disappeared with my legendary father's exit.

106. My voice is important to protect others, as I oppose such attacks, and encourage the use of words, not weapons and not attacks against persons or their property.

107. It was unfair to attend a hearing without proper notice, opportunity to subpoena witnesses, call witnesses, build a defense, seek discovery, all the while not feeling well.

108. The Defendants, interfered with, impeded, obstructed my access to the



courts and threatened to seek to take away my active license to practice law by seeking to place me on inactive disabled status, harm my reputation, my ability to work as an attorney, but for my law suit to protect my free exercise of religion, association and speech, in an attempt to impede an active law suit, initiated in the Chancery Court that is being considered before the United States Supreme court, based on my exercise of a right to petition as a party, not acting as an attorney, in which I seek to relief from a substantial government burden upon my religious exercise under *Religious Freedom Restoration Act*, 42 USCS § 2000bb (1-4).

109. I initially brought this law suit to enjoin proceedings brought by Defendants seek to place my active license to practice law, in inactive disabled, in a conspiracy to obstruct, impede, harass, and interfere with my exercise of civil rights in violation of 42 U.S.C. § 1985 (2)(b).

110. Defendants in violation of 42 U.S.C. § 1985 (2)(b), with two or more persons, including but not limited to Defendants, ODC, Patricia, Judge Kenneth Clark, and DE-Lapp employee, Carol Waldhauser (“Carol”) and Eleanor Kiese (“Kiese”), Delaware agents, or arms conspired unlawfully to pressure Plaintiff to forgo her case to protect her free exercise of religion, or to obstruct, deter, by force of government authority, intimidate, impede and threaten, a party, me, Meghan Kelly in the Chancery Court, and, also in the United States Supreme Court case *Kelly v Trump*, from attending such courts, of from “testifying to any matter pending therein, freely, fully, and truthfully, or to injure such party ... in (her) person or property.”

111. Defendants seek to injure me in my person or property by 1. seeking to disparage my reputation and credibility as labeling me “disabled.”

112. Defendants seek to injure me in my person or property by 2. initiating investigations and proceedings to place me on inactive disabled status on my active fully paid license to practice law, seeking to take away my property interest in my active license to practice law, and preventing my ability to seek a job as an attorney or in any other field with such a defamatory label, thereby potentially committing me to a life of poverty without the prospects of finding a job.

113. Defendants seek to injure me in my person or property by 3. impeding, interfering, harassing, obstructing, threatening me by investigations, which I believe are never to help the one investigated despite DE-Lapp's letter, during an ongoing proceeding, *Kelly v Trump*, in violation of my right to petition, with intent to impede my petition for relief in *Kelly v Trump*, or in reckless disregard that a reasonable person would be deterred from continuing her case under the facts.

114. Defendants seek to injure me in my person or property by 4. intentionally or recklessly causing emotional distress manifesting in physical symptoms for the exercise of my First Amendment rights to petition, speech, exercise religion, and association, in violation of those rights.

115. Defendants injure me in my person or property by 5. placing me in potential danger. I sought relief from the Chancery Court because I feared physical violence against my person. Someone talked about shooting me as I indicated in my brief for the Delaware Supreme Court for my mere stickers on my car exhibited speech "Impeach No one is above the law! No One is Below the Law," and "Impeach Serve your country not your seat." US Ex- Appendix E.

116. Someone threw a white thick substance at car in Millsboro, apparently to

show their disdain to my speech, my stickers. I took my stickers off. Since so many people gave me the middle finger, and I did not want harm to come to me or my property based on my speech. District Court Exhibit 1.

117. I live in Sussex County, Delaware, an area full of Trump supporters and republicans, where democrats, like me are not popular.

118. A few people have called me, a democrat, a “demon-crat,” making jokes that are not funny. If they go beyond a joke, it is no laughing matter. There have been attacks against fellow Americans based on party orientation have gone beyond jokes in recent years. See US Ex-Ex 23, relating to 54 cases invoking former President Trump in cases in connection to threats or violence. See US Ex-Ex 24 relating to former President Trump encouraging the militarization of police arguably to combat citizens who exercise their freedom to associate to speak to protest his government policies. See, US Ex-Ex 25, where former President Trump manufactures the threat that protestors exercising their freedom of speech and association will loot. Thereby, Trump, a government agent, encourages or incites private people to shoot or attack protestors to defend property against false threats, chilling the protestors freedom to associate and speak by government incited private attacks, and militarization by police to use violence against individuals who pose no risk of looting. Also see, US Ex-Ex 10 relating to Trump insulting people of the Jewish faith for not supporting Trump. Also see US Ex-Ex See, US Ex-Ex 11 relating to Trump’s call for discrimination against Muslims.

119. The government through some, not all agents, incited private violent, economic or social persecution toward fellow Americans based on political or political-religious association should not be permitted, despite the long history of social persecution

based on government party.

120. The government through some not all agents, model wicked behavior inciting a segment of the population to use violence or threat of violence against fellow Americans, by personal insults, dehumanizing people based on party, religion or association and appealing to false threats, fears, and emotions, not leadership through love and concern for the people they serve regardless of party, race, religion or place of association.

121. This name calling by private parties, “demoncrats” is protected speech. Private people are allowed to call me demoncrat, a religious-political word. But I believe such religious, political dehumanizing name calling stems from the unlawful establishment of government-religion, government-party-religion or government-official-religion by government agents, government officials or government partners who take money or barter favors from the government for a shared purpose, including churches, who should be considered government agents by accepting money for a government purpose.

122. Government officials and government agents should not be permitted to establish government religious beliefs, or establish government party religious beliefs that persecute people of diverse government or religious beliefs or teach the lie those who speak, associate or worship differently, are the enemy just because they do not conform with the government religion, which I believe is business greed, not good by unconditional love and respect for fellow Americans. Government agents should not be permitted to incite private citizens, or public citizens such as the National guard, police or military, to commit violent acts or threat of violent acts against Americans based on political-religious beliefs or perceived political-religious beliefs or false threats to harm to property not yet

ripe for correction.

123. The Defendants should not be permitted to take away my active license to practice law or to label me “disabled” for my religious or political beliefs and speech reflected those beliefs, to chill my speech, religious belief, or association as a colleague licensed attorney, as an indigent, as a Christian or as a democrat.

124. My faith in God through the father, the son Jesus Christ and the holy spirit is not a disability.

125. Jesus taught you cannot serve God and money. *Matthew 6:24*. Money is not my savior, and is not what drives me to get up each day, my love for God is. The fact the defendants do not understand my belief, does not make me “disabled” for thinking and believing differently.

126. People talk about President Trump as “anointed by God.” See, US Ex-Ex 34, Fox News, *‘I hope it’s true’: Trump responds to claim he was chosen by God*, By Caleb Parke, June 25, 2020; US Ex-Ex 34, Fox News, *University professors say more churchgoers believe Trump is ‘anointed by God’*, By Caleb Parke, May 13, 2020; US Ex-Ex 36 CBS NEWS, *Trump tweets quote calling him the “second coming of God” to Jews in Israel*, By Sophie Lewis, Aug. 21, 2019.

127. People have accused me of not being a Christian because I am a democrat, or because I am a catholic, or because I do not support President Trump, or because I am not a republican.

128. There is a dangerous religious entanglement of political beliefs held by impassioned misguided people to believe the use of violence against perceived enemies of their religion, government-religion, is warranted to defend their God.

129. I am reasonably concerned about my safety given someone talked about shooting me for my mere stickers, especially with the rise of violence based on people of diverse political and religious beliefs and speech, including protests, throughout the country.

130. Additionally, one of my neighbors, who previously threatened to ram into my car, if I parked it in front of one of my parents' empty lots, who previously cursed at me, and threatened to use his gun if someone trespassed on his property at a development meeting, started yelling at me threateningly concerning a banner, speech, I wanted to put up temporarily on my parents' lot. I was reasonably scared, after a stranger had talked about shooting me, after this neighbor threatened to ram my car, or use his gun in a development meeting. So, I called the police, per the attached report. District Court Exhibit 2.

131. Should the Defendants be permitted to label me "disabled" and I am in actual danger in the future, that label may prevent other people from taking me seriously or from helping me. I am scared of potential violence taken against me.

132. My friend, Greg Layton and his wife were shot at in their home for their alleged speech as I indicated in my DE Supreme Court Brief. There has been an uptick in violence in our nation. District Court Exhibit 3. On January 6, 2021, an attempted insurrection occurred at the capital, and people are still talking about "hanging the politicians," civil war and overthrowing the government in Sussex County. It is scary. I am concerned about my safety as I seek to freely exercise my speech, association and religion. That is one reason why I asked the Chancery Court for protection to reduce the violence I believe rooted in the establishment of government-religion by barter or

exchange, not freedom or free exercise of religion. US Ex-Appendix E.

133. I disagreed with people in power, including democrats by proposing different ideas concerning healthcare, by laws that require products made to last, made to work instead of made to disintegrate, polluting in producing replaced items or replaced parts, while costing the customer more money, or penalties, such as taxes, to reduce pollution by making it too expensive to use products or services that it reduces use, and thereby reduces pollution, and my opposition to the death with dignity acts and abortion and other areas, including my opposition to violating my religious beliefs.

134. I believe associations such as a party, my democratic party, and other entities are weaker than individuals within such association or entities, who have freedom of thought to think beyond the conditioned will of the entity, or group, to care to know, and care to love one another beyond conditions, unconditionally.

135. The right to assemble and associate must be protected, but the right of artificial entities such as associations must not sacrifice individual's liberty to maintain existence. The right of free will, freedom of conscience, of each individual, outweighs the mob, conditioned, controlled will of associations and other artificial entities without hearts that run on money or conditioned interest or labor. The freedoms of associations and entities must be more limited in order to protect individual liberty, which is safeguarded under the First Amendment. Disagreements, finding flaws in ideas within entities and associations helps us to learn how to improve which is strength not weakness.

136. My freedom to think differently, by my free will, as opposed to forced government agent will must be protected, to protect other individuals in their exercise of freedom of conscience to worship, to speak, to associate, to live out their religious beliefs.

137. I may be attacked or demeaned by those in government or private power who disagree with me, just like I am being attacked by Defendants who disagree with me in *Kelly v Trump*. I may need the safety of the courts, police or others who may find me not credible based on such a label disabled, or I may be discredited and ignored with a procedural determined label disabled thereby quieting my speech by a government forced title, “disabled” which will likely suppress my speech from being heard.

138. I upset people by the following activity: I sued the Democrats Democratic Party in the state of Delaware. US Ex-Exhibit 2. I drafted five separate proposed articles of impeachment, and contacting each and every 541 Federal law makers to persuade them to impeach former President Trump relating to the porn star payoff, to safeguard the freedom of the press under 18 USC § 227, to safeguard the freedom of speech and freedom to assemble to protest by the NFL players pursuant to 18 USC § 227, to prevent world war 3 with regards to Iran, and to protect due process of law and alleged foreigners from being kidnapped and placed in detention centers in conditions so horrific as potentially violating the 8<sup>th</sup> Amendment’s protections against cruel and unusual punishment. US Ex-Ex. 7, and see US Ex-15, to see more laws I allege former President Trump violated in my proposed articles of impeachment.

139. I proposed changes to policies or laws that safeguard individual liberty and human life and health as opposed to safeguarding money, which irritates people who value money more than humanity. For example, see, US Ex-Ex. 8, US Ex-Ex. 43. US Ex-Ex 46. District Court Exhibit 4.

140. I also often make comments in my continuing legal education class, like I used to in my bar sections. Even though the instructors may want to train us to think as



they instruct, instead of encouraging us to use our own free will to think for ourselves, instead of the conditioned, trained, forced will of imperfect instructors to analyze potential concerns with the legal instructors' proposed solutions to issues. District Court Exhibit 5.

141. I sued former President Trump, and seek to sue President Biden by substitution. US Ex, US Ex-Ex A, and US Ex-Ex 2.

142. I will continue to critique our government leaders' policies and proposed law.

143. The label "disabled" will demean my reputation before law makers and government officials preventing my speech from being heard, making my desire to serve God by seeking justice by just decrees that care for people, as opposed to unjust decrees that reward business greed by oppressing, harming or exploiting people, will be left unfulfilled.

144. I will continue to critique policies and laws and suggest more just decrees to prevent hardship, as opposed to unjust decrees that exploit need to make material gain off of hardships, instead of alleviating the need of the people.

145. I desire to prevent evil planned schemes by using my freedom to speak without government sponsored persecution or suppression of my speech by forcing the defamatory title of "disabled" upon me, for believing the ways of Jesus instead of the ways of the world which I believe the bible teaches are controlled by business greed, temptation to reflect the evil one, not the image of God by love for humanity. 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." Also see, 1 *John* 4:16 "God is love." When we sacrifice worldly gain to care for those in need at a worldly loss, that is reflecting the image of God by unconditional

love, not conditionally caring based on relationship, reward or avoidance of harm.

146. Global policies look like they will lead to a global famine. The US is not the only country that had large scale persecution towards migrants who desired to harvest fields, potentially creating fewer harvested crops.

147. There is also evidence of policies exacerbating inflation instead of alleviating it. For example, to save the post office, the federal government should reduce the price of postage to a quarter. That way people could afford to buy a stamp, and the post office would make money in bulk. The post office should also cut package rates in half to attract business away from competitors instead of towards competitors.

148. Instead, the post office increased rates of postage and will sell fewer shipments, and thereby the post office will make less profit from shipments.

149. Suppliers of products may increase prices of products and goods based on the increase in shipment costs through the US post office, needlessly creating inflation, during a global pandemic, where many through no fault of their own, are out of work.

150. The post office is one of the few forms of speech that may not be easily manipulated, monitored, bought and sold by third parties, making free speech no longer free, but monitored to be bought and sold for a potential outsider's pecuniary gain.

151. There is evidence that global leaders, private and public, including American participants, through organizations such as the Federal Reserve, World Economic Forum, the Bank of International Settlements, the International Monetary Fund, the World Bank, and possibly the United Nations through their public and private partners desire to digitalize everything, currency and shipments, and to artificially cut off shipments through electronic disconnections, hacks to manipulate markets to artificially

inflate prices to force individuals in government private partnered forced servitude. District Court Exhibits 6, 8, and 9.

152. The Federal Reserve is the United States' private central bank which makes more money the more debt the country and the people are in. The more money created by debt gives politicians more play money, creating an obstacle, a temptation, for government employees, such as Presidents and congressmen, to serve their self-gain instead of the people and the country by increasing desperate conditions and debt to gain more play money to buy and barter favors with.

153. Janet Yellen, former federal reserve chair has a conflict of interest with the best interest of the country and the citizens she serves, since she desires to increase the debt ceiling, as opposed to creating money out of nothingness to care for the people by the creating paper money, instead of creating money out of nothingness to enslave the people to pay back banks, including the federal reserve for their free lunches.

154. Janet Yellen also has participated in meetings at the Bank of International settlements, a global entity that acts above the law, like the UN, and other entities that are rather difficult to hold accountable by the rule of law. The Bank of International Settlements looks after the central banks interest which is making money off of creating debt, which is harmful for humanity and the United States interests. See, [https://www.bis.org/author/janet\\_1\\_yellen.htm](https://www.bis.org/author/janet_1_yellen.htm)

155. The President through an executive order or Congress through the coining power has the power to eliminate the debt, fully pay for federal expenses, instead of increasing the debt ceiling as former Federal of Reserve Chair, Janet Yellen suggests, which may make the government become a debtor nation to the World Bank, no longer a

free country.

156. The United States also should dissolve global partnerships with the UN, the World Bank, the Bank of International Settlements, the International Monetary fund since partiality towards these partnerships towards partnerships, global or local, blinds our government servants' eyes from seeing clearly to care for the people.

157. I recently discovered America was never free. This country has always been for sale, by those who buy influence through alleged donations or steal it to sell it to those who barter for their favor or potential favor by donations, tax breaks, favors or support to government candidates or servants in exchange for unjust decrees that favor those who favor them or bailouts for bad business or worse to entities as opposed to individuals.

158. I learned we do not have a free market. We have a manufactured forced controlled market stifling innovation under the guise, the lie, that more money to fund greed will create more innovation when it rewards more misbehavior into infinity for a different drug, or research product, or different use for the same product or bad business through bailouts, or fundraisers or grants to give money to the wrong doers who caused the problem.

159. I recently learned, though I knew in the back of my hard head, that we do not have free market globally, but a forced controlled market by entities who control countries and entities within countries, both private and public entities, like parts in a factory line. I am not only thinking of the Opium trade where Great Britain misbehaved by growing opium in India and selling it by force to addict people in China to buy more, causing the Opium War of 1842 and other abominations throughout world history.

160. More recently, I read the plans of the founder of the World Economic Forum, Klaus Schwab. Countries, including the United States by private and public sectors appear to be implementing parts in Klaus's Frankensteinish model, the space race, alleged reading thoughts, driverless cars, automation at the checkout, bio editing DNA, increased digitalization, and more. On an aside, I do not believe our mind can be read. I believe our emails can be read.

161. We have a forced, controlled market, eliminating people's free choice and freedom of innovation by freedom of thought, speech and exchange of ideas, by forced across the professional associations across the board's forced will of a few who profit off of the many. District Court Exhibits 8 and 9.

162. In my complaint below, I also mentioned unnatural conditions leading to famine and price increases, and increased desperate conditions leading to volunteering, pro bono, organized charity and fundraising which I believe Jesus teaches damns people to hell in *Matthew* 6:1-5, and the elimination of government welfare which is Godly and good. US Ex-Ex A.

163. Welfare helps those in need without exploiting such need to serve greed by corrupt bought, not free partnerships with private entities, such as heartless not for profits, businesses and entities called charities.

164. Secular Government Welfare, as opposed to charity, to care for individuals in need is commanded by God. See, *Deuteronomy* 24:19, "When you reap your harvest in your field and have forgotten a sheaf in the field, you shall not go back to get it; it shall be for the alien, for the orphan, and for the widow, in order that the Lord your God may bless you in all the work of your hands." See, *Leviticus* 23:22, "When you reap the harvest

of your land, moreover, you shall not reap to the very corners of your field nor gather the gleaning of your harvest; you are to leave them for the needy and the alien. I am the Lord your God.” *Ruth 2:2-3* And Ruth the Moabitess said to Naomi, “Please let me go to the field and glean among the ears of grain after one in whose sight I may find favor.” And she said to her, “Go, my daughter.” So she departed and went and gleaned in the field after the reapers; and she happened to come to the portion of the field belonging to Boaz, who was of the family of Elimelech.” *Exodus 23:11*, “You shall sow your land for six years and gather in its yield, but on the seventh year you shall let it rest and lie fallow, so that the needy of your people may eat; and whatever they leave the beast of the field may eat. You are to do the same with your vineyard and your olive grove.” This allows the poor to pick up and gather the crops and sell them or use them for food.

165. I also have ideas on how to reverse or prevent an economic crash should the elimination of the dollar occur, as the World Economic Founder plans.

166. Congress can take back its delegated power to coin money without borrowing it to care for its people. This will not deter people from working, and may be used within limits for those in need as opposed to exploiting need to serve greed, to care for, instead of exploit, the elderly, the unemployed, the poor, and people with disabilities and disease, while safeguarding each of these individual’s freedom.

167. Our current model creates artificial, unearned debt, in violation of the bible and the thirteenth amendment against forced servitude for unearned unjust riches for those who steal, kill and destroy to serve business greed, not good by love. See, *Ezekiel 18:13*, “He lends at interest and takes a profit. Will such a man live (meaning eternal life)? He will not! Because he has done all these detestable things, he is to be put to death; his blood

will be on his own head.”

168. With regards to proposing policies, and solutions, I discovered a plan to crash the dollar, the economy, and overthrow the United States governing power.

169. Our leaders have been implementing policies in the founder of the world economic forum, Klaus Schwab’s books, with the founder’s goal of illuminating freedom, free will, by forced economic need to survive in a sort of cyber fiefdom model.

170. According to an article, included as an exhibit hereto, by the World Economic Forum, “(We w)on’t” anything. (We w)on’t own a car. (We w)on’t own a house. (We w)on’t any appliances or any clothes.” District Court Exhibit 6, also found at: <https://www.weforum.org/agenda/2016/11/8-predictions-for-the-world-in-2030/>

171. It appears the goal is to increase desperate conditions, by taxes, or placing sensors on everything to charge by units, time or use, by eliminating paper money and tracking every purchase from every person to target that person to get as much as they can for as little as they can, tracking water and sewers to charge fees, fees for mileage of vehicles and more, to force people to lose title to their real property.

172. I had researched a proposal that indicated that real property may back a global currency, but my computer crashed and I lost all my information.

173. I discovered former President Trump appeared to have an interest with an entity that had global connections buying up real property that might be connected to this alleged plan. District Court Exhibit 7.

174. I was able to keep the entity information because I emailed it to my opponent in *Kelly v Trump* before my computer crashed wiping it clean of all files. *Id.*

175. I wanted my opponent, in *Kelly v Trump*, United States District Court

Attorney for the District of Delaware, David Weiss, to try to protect the United States from an economic crash, by guiding the courts to be our heroes during such perilous times, in case he becomes the only hope we have. Id.

176. With regards to the elimination of private property, including ending private ownership in real property, Delaware appears to be implementing a takeover of private real property towards government ownership, which may in turn be used to give to the creditor of Delaware and government debts, losing not only private control of real property, but public or government control of real property to pay back artificially created debt down the line, making the Americans and the United States government no longer free.

177. There is land dedicated to government bodies in Sussex County on the condition such land is not resold. The obvious intention of the deceased grantors was to preserve nature, wetlands and natural habitats. The government entities misbehaved by granting 99-year leases, where the trees were bull dozed, nature destroyed, the land leased, and homes were built and mortgaged on said 99-year leases, ignoring the obvious intended condition of the dedication, preservation of nature to gain more government money through leases or transfer taxes, and favors from developers who build mortgaged homes on the 99-year leased real property.

178. Similarly, some owners of farms in Sussex County received government pay in return for giving the state of Delaware construction easements above and below the property, as approved by Sussex County Counsel. While, the state espouses the aim of preserving farms, the state will be tempted by harder economic times, as will farmers to sell the farms. The state will likely be the only ones willing to buy farm land others cannot



build on.

179. By the doctrine of merger, the state through its employees may get the land in toto to invest, lease, sell and profit off of personally by trading favors with entities or people to serve their seat or interest at the public's expense.

180. Who will correct the government agents in the executive and legislative branches from misbehaving? Who will have standing in court? How can we reduce prevent government agents from giving into temptation to harm people's lives, health and the environment to serve business greed, by barter or exchange, the mark of the beast, not mark of good or love? These are all questions I ponder. I think the solution is to safeguard the freedom to criticize government policies and practices, even the freedom to be wrong, or to have different ideas, without government retaliation, which includes the freedom for me to bring a law suit against former President Trump to dissolve government-religion, as protected speech.

181. I am also concerned about the state's plan to reassess real estate to increase taxes because the increase in real estate taxes will prevent potential home owners from buying a home by rendering it unaffordable by increased taxes, and possibly push home owners out of their home, ending private ownership of real estate per the sinister plans of the world economic forum.

182. Delaware had the highest rate of foreclosures out of all the states this year. See, Delaware News Journal, *Delaware sees highest foreclosure rate in U.S. this year, data analysis company finds*, by Sarah Gamard, dated, April 15, 2021, available at <https://www.delawareonline.com/story/news/politics/2021/04/15/delaware-ranked-1st-u-s-foreclosure-rate-data-company-finds/7218522002/>

183. Delaware lawyers had a hand in drafting the grants of 99 year leases to dedicated property to government entities and towns, ending private ownership in fee simple through leaseholds, defeating the purpose of preserving the land, and eliminating wet lands and natural vegetation.

184. It is wrong for our profession, lawyers, to conspire to misbehave, by harming the people we are charged to serve in our personal pursuit of money. We, lawyers, are not supposed to behave as children of the devil, a pack of wolves, looking after our own under the guise of looking after the sheep we are charged to care for, only to feast on their flesh, in violation of the bible. I believe people go to hell for taking care of their own, professional groups, or families, or business or other entity, at the expense of oppressing or harming others to serve their business greed.

185. Lawyers and all professions should not collude for profit by self-regulating, and behave above the law too. The Court should give little deference to standards across professions and experts, since such standards look after the professionals and experts not those they are charged to serve.

186. Science is the study of things. Science always contains known and unknown variables including time, that make scientific results imprecise evidence to prove hypotheses. Once a person declares himself an expert, the master, the God, of his profession, he defeats science, which after all is merely studying things by ending such learning. No one is God but God. Please note, science, defined as the study of things, I believe proves God created things.

187. I like science, but I remain humble since variables, unknown and knowns is always part of the process. Should an expert lack humility, and exhibit pride or

confidence, they should not be trusted as there is a conflict they may serve their profit, ego or cronies or they may be dumb, not understand science is learning, with variables that make all scientific determinations potentially inaccurate. Science is not perfect like math. Truth is preferred to false comfort. The law is balanced towards injustice by the court's deference towards professionals across the board, in the community or nationally, based on evil love for business greed, love for money, driving out love for one another by recognition of business standards.

188. Entire professions appear to be controlled not by free will, freedom of thought to innovate, but a forced will by funding and donations to schools, businesses, not for profits, charities, and through the conformed compelled will of those providing continuing professional classes, and professional organizations like the office of disciplinary council, all stifling improvements that otherwise may be made by the free exchange of ideas, to gain the control or profit of entire industries by a few under the veil of science or guise of serving the public, while I believe damning most of humanity to hell for *Matthew 6:1-5* violations, teaching business greed is good.

189. I believe the fact people were doing what they were told, adhering to professional norms, or doing their job, as they exploit customers or employees to gain as much money as they can for as little cost as they can, or harm human life and health, will damn people on the last day at the resurrection of the dead from their graves, not save people from being thrown into the fire the last day, should they not repent.

190. It makes me sad that courts often reward blind eyes, by insulating people from liability by permitting delegation of duties, rewarding not knowing or ignorance concerning harm.

191. I believe blind eyes and dumb ears, reflects the sin that damns people to hell, not choosing to care to think, to know, to love, not using their brains, their free will to consciously choose to love, should they not unharden their hearts.

192. Some laws encourage not knowing, when harm and hell can be prevented and people saved from deception for dollars by knowing truth in love, instead of giving into temptations to make some heartless entity money.

193. This summer of 2021, I read two books written by the World Economic Forum founder, *The Fourth Industrial Revolution*, by Klaus Schwab, 2016 version, which may be found at:

[https://www.academia.edu/38203483/The\\_Fourth\\_Industrial\\_Revolution\\_pdf?fbclid=IwAR1koMak7N-40mbSf9wSGt8XzdhAJgafnbmobfn70FB4nbqcafl\\_hsN-RnQ](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, which may be found at:

[https://carterheavyindustries.files.wordpress.com/2020/12/covid-19\\_-the-great-reset-klaus-schwab.pdf](https://carterheavyindustries.files.wordpress.com/2020/12/covid-19_-the-great-reset-klaus-schwab.pdf). Attached as District Court Exhibit 8 and District Court Exhibit 9.

194. These two books allude to the preventable, reversible planned elimination of the dollar, and an American economic crash by design, with about 47 percent of Americans expected to be unemployed by 2026-2027. including lawyer jobs. District Court Exhibits 8 and 9, page 38-39 of the Fourth Industrial Revolution, journalists are on the chopping block too

195. Per *The Fourth Industrial Revolution*,

“Sooner than most anticipate, the work of professions as different as lawyers, financial analysts, doctors, journalists, accountants, insurance underwriters or librarians may be partly or completely automated... This research concludes that about 47% of total employment in the US is at

risk, perhaps over the next decade or two,” Id. At page 39.

196. Regardless as to the false sugar coating in the book, you must read between the lines in these books. *The Fourth Industrial revolution* outlines plans to make profit a different conniving way, not by improving the lives of humanity, instead by exploiting humanity for the love of money differently by eliminating property, by increasing desperate conditions. So people will allegedly use fewer resources, and no longer will afford to have private property. The majority of people will be forced to rent everything, and be rented by those who control the use of resources.

197. The books allude to, the dismantling of government by a takeover through the back doors to our electronic devices that President Bush opened up with the Patriot Act, 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 in *Kelly v Trump* was 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, such as 18 USCS § 201. Allow the vote to be the only form to elect leaders.

198. Alternatively, I believe the overthrow of the United States can be prevented by the government taking back its government coining power from the private sector, the

Federal Reserve, a central bank which makes more money the more debt the people and government accrues. President Biden may draft an executive order to create paper money, without interest, and without debt to care for the people as both Presidents Lincoln and Kennedy chose to do.

199. 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, arguably in violation of the 13th Amendment. See *the Creature of Jeckyll 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%20Creature%20From%20Jekyll%20Island.pdf](https://ia802609.us.archive.org/14/items/pdfy--Pori1NL6fKm2SnY/The%20Creature%20From%20Jekyll%20Island.pdf) , for more information on how money is created. Also see Exhibit H which contains excerpts from the book. Please note, I disagree with the author's theories premised on violating God's law by attacking welfare, and social security, as welfare is commanded by secular laws in the bible too.

200. Banks create money out of nothingness to profit off of indebting the people and the federal government to pay interest on bonds. The government can coin money out of nothing to care for the people, without requiring they pay it back, or pay interest. Additionally, our bank system is a ponzi scheme, in that they lend out or sell what is not theirs to make interest profit, the depositor's money, potentially losing their customers money should a bank rush occur as the FDIC only has limited funds. Banks are rewarded

by taking risky investments with someone else's money as they wrongly count on the government to bail them out, after the FDIC funds run out, at the cost of increasing desperate conditions upon the taxpayer in terms of inflation and taxes as a result of the banks, not the government, creating too much money out of nothingness to serve the banks' greed, not good.

201. Congress or the President through an executive Order like President Lincoln drafted have the power to create paper money out of nothing and pay back all debt, and pay federal salaries, and limit banks to lend out what they have on reserve instead of their depositors' money. If the government pays banks all debt due, banks will have reserves, their own money to lend out and risk. This will end the ponzi scheme the Federal reserve and banks adopted by the Bank of England, by ending lending out what they do not have, what is not theirs at a profit by interest, potentially causing bank crashes like the one in 1907-8 should a bank run occur. Bankers will make wiser and most likely fewer loans since they will lose their own money as opposed to the depositors' funds should debt not be repaid, preventing bank crashes and inflation.

202. Taxes could be eliminated too, to allow people more freedom to think and innovate and improve items and services, instead of being oppressed to conform to our manufactured economy of bad products and poorly performing services, made to break and repair or replace items, products that cause cancer, food that makes us sick, medicine that makes us feel better by feeling nothing, inhibiting our faculties preventing us from using our free will, our conscience mind to think, care, know God, to love God and one another, I believe guaranteeing people's damnation in hell, instead of healthcare that heals, and laws that reward money at the cost of human life, health, the environment, and oppressing the

least of these to bondage, enslavement to work for those who serve Satan by serving the bottom line, without regard to humanity outside of their own unless it affects them. Their freedom to think is more valuable than money. Money thrown at universities, candidates, not for profits, businesses, alleged charities or other fictitious entities without hearts who run on the bottom line, by philanthropists or donors who force their will to be done in a manufactured not free economy, prevents innovation, just like throwing government money at business, not for profits and charities does. Greed to fund bailouts and bad business is not good, and should not be rewarded and perpetuated.

203. Should either President Biden through an executive order, or Congress under Article 1 Section 8, coin money without borrowing it to pay off all debt, and fully fund the federal government, the risk of an economic crash will be prevented or may even be reversed, should a crash occur down the line.

204. Another problem arises, the stock market is a ponzi scheme too, by selling I owe yous, what people do not have in the form of shares of stocks, and what they may lose should businesses go under by design to get tax write offs.

205. I am not sure how to prevent the elderly from losing their retirements by design. Bad businesses should fail. Individual businessmen, members, executives, partners and other leadership positions, who profit off of stock buy backs, may store profit, salaries and bonuses in off shore accounts which are not susceptible to losses in economic crashes should not be rewarded. The system is rigged by design for the shareholder or the tax payer through bailouts to pay the cost for losses which fund unjust gains for bad business. Even if the wrong doers pay cost, they may be able to write them off in tax breaks, but it is rather difficult to pierce the corporate veil, rendering members, partners and others within entities



essentially above the law of accountability by design.

206. Should a stock market crash occur, losing retirees lives' savings, the government should coin money without debt to care for the elderly too, while protecting the elderly's freedom, their free will to do as they choose with the money, not be forced to use it towards entities or government private partners, unless they can think of a better idea to care for the elderly. There is a way out.

207. Part of the global plan appears to be to force the United States into debt to a global entity, essentially becoming controlled by that entity the World Bank, the Bank of International Settlements, International Monetary Fund or UN, making it no longer free, but controlled by debt.

208. The United States Supreme Court indicated President Lincoln's paper money was constitutional, overturning a prior case. In *Knox v Lee*, 79 U.S. 457 (1871), the U.S. Supreme Court held that the Legal Tender Act, which authorized the printing of paper money, President Lincoln's Greenbacks, not redeemable in gold or silver, nor creating debt or incurring interest, did not violate the U.S. Constitution. In so ruling, the Court reversed its earlier decision in *Hepburn v. Griswold*, 8 Wall. 603, 623, 19 L.Ed. 513. There is a way out to reverse or prevent a planned economic crash.

209. Janet Yellen talked about delaying payments for social security which comes out of a mandatory fund, not a discretionary fund should the Federal Government default on their payments.

210. This does not appear lawful or just. Janet Yellen has a conflict of interest to make more debt to make her former entity the Federal Reserve more money at the cost of harming Americans.

211. 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, which I believe is the mark of the beast, the twice dead, people who sadly will go to hell because they are blinded by money or another idol, even their own life.

212. The Presidents and formerly Vice President Biden attended the World Economic Forum meetings.

213. If you read through the World Economic Founder's books, you will see the driverless cars and other items implemented in our government are all part of the *Fourth Industrial Revolution*. District Court Exhibits 8 and 9.

214. I am obviously going to care about other people, the world and our country enough to think of ways to prevent the wicked global schemes from happening, though I see implementations of the policies step by step occurring before my eyes. Defendants procedure to remove my active license to practice law as disabled inactive would diminish my voice, making my free speech, quieted by the controlled forced defamatory name calling by the Defendants, government agents.

215. I am going to continue to care about others and the threat towards the elderly with regards to losing their social security, and I will speak up on alternative solutions to prevent harm to Americans and the world.

216. I desire to prevent the evil schemes that will cause great harm under the guise of good.

217. A label "disabled" is not only insulting, but it will diminish my voice, and

inhibit me from preventing planned, forceable, preventable harm.

218. Just because I think for myself, or I think differently, without giving into temptation to trained, conditional, conformed thinking does not make me disabled. Thinking for myself, even outside of the box drawn by those who seek to control choice or force choice, instead of safeguarding free choice, makes me reasonable and of sound mind.

219. Making mistakes in filings, given my lack of resources, extreme duress and emotional distress concerning what I believe is the government using my God's name in vain, does not make me "disabled." It makes me human, capable of mistakes with lack of resources to perform better.

220. My faith in God through the father, the son, Jesus, and the holy spirit is the most important thing in my life. By choosing to file the law suit *Kelly v Trump*, I chose to love God, by not standing by and allowing my God's name to be profaned by the establishment of government-religion that I believe glorifies man or sin in place of God, under the guise of Godliness, misleading many people I love to hell, and to the suppression of my religious speech and practice by those who adopt the government-religion and silence my speech.

221. I am horrified by the fact that about 750,000 Americans have died after contracting covid 19, during this pandemic. People are dying every day. I believe potentially being misled to hell for their adoption of government religious beliefs.

222. The fact I am saddened by the death of people who glorified President Trump as anointed by God while mimicking Trump's sinful behavior does not make me disabled. My heart is not cold. I care about people's lives and eternal lives.

223. The Defendants are initiating proceedings to place my license to practice

law on, “deactive disabled,” on account of having so attended court or testified through my pleadings, or to influence the verdict, presentment, in the Chancery Court or United States Supreme Court.

224. Defendants, and additional persons conspire for the purpose of impeding, hindering, obstructing, or defeating, in any manner, the due course of justice in any State or Territory, with intent to deny to any citizen, (me, Meghan Kelly) the equal protection of the laws, or to injure (her) or (her) property, license to practice law, reputation, speech, religious exercise, and association as an attorney, as a Christian and as a democrat, for lawfully enforcing, or attempting to enforce, the right of any person, Meghan Kelly, to the equal protection of the laws.

225. I have not worked as an attorney for over five years because I took time to do what is more important to me than earn money, serve God by seeking just decrees. As a Christian, I believe justice with mercy and correction to prevent condemnation are commands by God. See *Matthew 23:23*, *Amos 5:15*. My license to practice law is no threat to the public given I am not representing anyone. I do not plan to represent anyone until the pandemic subsides, as my life is more important than money.

226. While I worked at my former law firm as a real estate attorney, my friend a Delaware Attorney, Dick Goll, Esq., died, another Delaware real estate lawyer. Through his death I learned out of state real estate companies were practicing law without a Delaware license to practice law, exploiting people like my friend, the respected late Dick Goll, Esq., while allegedly messing up the chain of title per members of the real estate section of the Delaware Bar.

227. I recall people in the real estate section of the Delaware bar indicating

sometimes there were title company addresses with no lawyer address to contact for deeds with errors, making the chain of title a problem for future buyers and sellers with no means to seek relief by an attorney who made such error, since no attorney was on the deed.

228. I contacted the Defendant ODC in order to seek to prevent future problems and loss of tax revenue from the state of Delaware. Since out of state title companies do not pay taxes for attorney work, they unlawfully perform in Delaware.

229. I contacted law makers too, but no one helped me resolve the real estate issue. One law maker met with me concerning the issue of title companies only to be interested in a personal relationship and connections which was unprofessional and offensive.

230. My younger friend, who used to attend Chamber events with me, allegedly befriended this same law maker. She told me he kissed her. That is so gross. When people go to someone for professional help, they should not have to essentially prostitute themselves, not in the sexual sense, but by forming personal relationships in order to obtain professional help.

231. I continued to seek to find a way to prevent the real estate title issues. I talked to the Insurance Commissioner, but he ran a way from me at an event and his staffer merely wasted my time by offering to set up a time to talk to someone at his office about it.

232. A now retired Delaware Supreme Court Justice, Justice Holland kindly called me at my former law firm about the real estate title issues and offered to guide me on a different way to resolve the issue, by forming a committee to help the Court draft rules. However, if I was a member of a Delaware committee assigned by the government

to investigate issues, I thought my rights, including the right to speak would be reduced, more limited, in order to safeguard the rights of those the government is charged to serve, as a possible government agent. I was concerned about losing my personal voice, in a committee with a communal conditional goal, whose aim may be concerning safeguarding the government's reputation, jobs and status as opposed to protecting citizens of Delaware from harm and the unnecessary need to increase taxes or deal with problems in the chain of title.

233. My law firm's office closed down at the end of 2016, and I have not practiced law on behalf of another person as an attorney representing another since then.

234. Instead, I remained concerned about the title company issues, and other federal and state law issues. I began contacting government leaders even more on other issues, and attending events where government leaders were scheduled to be, like Chamber events.

235. I sent so many comments to President Obama, he gave me a Christmas card, with an envelop spelling Delaware incorrectly, slanted left handed, which I loved even more. District Court Exhibit 10.

236. I proposed more comments to lawmakers, but my computer recently crashed, and was wiped clean, including of my old passwords to different emails like electmegkelly@icloud.com. See District Court Exhibit 4.

237. None of my comments to government leaders moved them to act. So, I decided to run for office in the 38<sup>th</sup> District for the District of Delaware in 2018, in attempt to fix problems myself. US Ex-Ex 51.

238. A local newspaper, the Coastal Point, kindly allowed me to draft an article

relating to the title issues with a proposed solution to resolve the issues, and increase Delaware revenues without raising taxes, burdening the common man. US Ex-Ex 46.

239. To date, the title issue has not been resolved to my knowledge.

240. I continued to make comments to law makers, including on how to prevent oil drilling, safeguard social security, fully fund the schools and on how to improve healthcare.

241. I even drafted proposals for five separate articles of impeachment to impeach President Trump on. I contacted all 541 federal law makers by email, fax, phone call, post card or letter, on my quest to uphold the Constitutional laws that make us free.

242. However, none of my efforts made a difference. So, I looked into running for President without violating my religious beliefs by asking for donations or signatures, without buying or being bought with money, but seeking the seat based solely on the vote.

243. I contacted the relevant election office in all 50 states regarding waivers for their fee or signature requirements. Both would require I violate my religious beliefs.

244. My religious beliefs were always at the forefront of my mind, but I sought a way I could be in a position to care for the people by creating just laws. I believe just decrees and justice in the courts is the solution, not money. The love of money, the security in money, teaching money is the savior is the problem not the solution. Since the love of money drives out the love for one another, and the love of God as savior, replacing money as savior. I believe the courts have the power to be life savers and eternal life savers by valuing and protecting the dignity of individual people, unearned, required, as worth more than money and material gain.

245. I called the US Supreme Court regarding the issue, and a staff member

kindly recommended I write the US Supreme Court a letter. I did write a letter indicating, but the US Supreme Court was not able to respond as my issue was not ripe. See, US Ex-Ex 50.

246. I kept contacting law makers to propose my ideas, but I think they threw them away, did not read them, or sent me auto responses. So, I asked the Democrats if they would waive the signature and fee requirements as violating my religious beliefs, so I would not be forced to relinquish my first amendment freedom to exercise my religious beliefs in order to run for the US House of Representatives. US Ex-Ex 50.

247. The democrats denied my request, and I filed a law suit in the Delaware Chancery Court. US Ex-Ex 2.

248. I withdrew my law suit because Covid 19 hit the world. Since I studied the history of medicine in a course at UD, and grew up with health professionals, my mother a pharmacist, my Grandmom, Cecilia Batten a pharmacist, and my other Grandmom Rosie Kelly, a nurse, I knew it would be serious and did not want to endanger people's lives and health to merely gain a position to pass imperfect, albeit I hoped more just decrees that cared for the people as opposed to harming them to serve business greed and the love of money. I am an imperfect person. I am not God, yet I have the love of God in my heart that teaches me to lay down my world desires, sacrificing to self, to care to love God and others as myself.

249. I was also communicating with my last law firm, negotiating coming back on board as a real estate attorney performing real estate settlements. But I set aside talks due to the pandemic, and due to the government establishment of religion that I believe caused a substantial burden upon my free exercise of religion, by causing people to



demean me as not a Christian, to insult me, and endanger me, and my exercise of my religion, speech and association without the protection of the Court. The violence throughout the nation based on religion or political association is not normal and I believe we, I, needed someone to govern and guide our nation with correction to prevent additional harm towards me and others throughout our country and the world. I hoped the Court would be our hero.

250. I filed *Kelly v Trump* to protect my free exercise of religion, speech, and association from government sponsored persecution for such exercise, and to dissolve the establishment of government religion by seeking to enjoin former President Trump and current President Biden from enforcing executive orders creating a union of government-religious entity partnership, including enjoinderment of Executive Order No. 13798, maintained and reestablished by President Biden by his enforcement of E.O. 13798, and President Biden's enforcement of 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, and Biden's enactment of Ex. Or. No. 14015, Feb. 14, 2021 ("executive orders"). These executive orders allow money or support to be transferred between government agents and religious organizations.

251. I believe the money in the bought, not free union of church and state is one reason why religious-political attacks seemed to have increased in recent years. President Biden's Valentine's Day executive Order, Ex. Or. No. 14015, Feb. 14, 2021, is troubling since it appears to allow government money to be bestowed to religious organizations, like

churches in other countries.

252. My exercise of speech in the pleadings based on my religious beliefs, are in issue. In elaborating on my beliefs, I find it repugnant for the President and the United States government, state governments and local governments to use my God's name to glorify government or men in government or government business, by establishing government-religious unions in the form of partnerships, essentially making it appear they are working with God or are backed by God, to the extent it has caused physical symptoms related to my horror, clenching of teeth, tears, pain in my heart, sleepless nights and anxiety. Since I believe it misleads people into giving into temptation to sin, confusing them into thinking evil is good, believing a lie as truth, damning them to hell on the last day should they not be saved by the truth of love to conquer wicked lusts, to conquer sin. I believe glorifying business, (like glorifying marriage or child bearing or death, martyrdom, punishments for original sin) by performing business with religious entities as Godly, teaches the mark of the beast, the mark of the whore, the twice dead, the mark of children of the devil is Godly or good. Business or work is a punishment outlined in *Genesis 3* to teach humility, part of people's lives, not the purpose of life to be glorified and praised misleading people to hell by the sin of pride. The bible is clear. Not everyone is welcome in church or heaven. Those who do business as worship serve the God of money, not the God of the Bible. Jesus chased out those who did business under the guise of worship in the place of worship, church or temple. *John 2:16*. Those who do business under the illusion of Godliness are not welcome in church or in heaven should they not repent. Those who do business under the guise of good, Godliness, or love, when it is giving to get, for recognition, tax breaks, marketing, networking, trading favors or

otherwise through fundraising, not for profits, pro bono, volunteering, organized charity, beneficial entities, beneficial corporations (I believe the new beneficial corporations violate Jesus's teachings in *Matthew* 6:1-5, while using other people's money, the shareholder's money, to potentially buy favors under the illusion of benefit or good, exhibiting the mark of the beast as beneficial, serving business greed, not good), not unconditional love, sacrificing material gain to care to love God or one another as ourselves, are not welcome into heaven. I believe they will be thrown into the fire the last day at the resurrection of the dead on the last day. Sadly, God teaches the confused, those who do not know, those who misunderstand will be destroyed the last day. Making people feel good, instead of helping them be good, have life and eternal life, is no good. It is bad and unloving. I would rather love people by dissolving this unholy, whored, bought or bartered or aligned union (supported by taking someone else's money, the tax payers to fund ventures), of government-religion, not free or based on freedom of church and state, to prevent deception that damns, while also protecting people's freedom, their free will from the forced will of government-religious partners by economic or social pressure or temptation to compromise Jesus's teachings to meet worldly needs.

253. In my religion, Christianity, the first civil King of Israel, Saul was separate from the religious leader Samson. The second King of Israel, King David, was separate from the religious leader, Nathan. Even Jesus the Christ, was separate from the civil leader Caesar.

254. Keeping religion and government separate allows the government to guide and govern private entities, including religious entities. If the government partners with private entities by grants or otherwise, its hands may be too dirty to clean the hands of the

private entity it colludes with, essentially making partners, in this case religious partners above the law. Which is troubling, since the Supreme Court has already wrongly indicated, the courts have no place to guide or govern with the rule of law the internal affairs of religious entities as distinguished from the religious individual, making churches and religious entities to appear to already be above the rule of law in some cases. The Supreme Court erred in *Our Lady of Guadalupe Sch. v. Morrissey-Berru*, 140 S. Ct. 2049, 207 L. Ed. 2d 870 (2020), rendering religious entities to lawlessly do as the please, fire employees unjustly without a remedy. It appears that if a religious organization 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, the entity may use its religion, including non-religion as a religious belief, to force people, employees, suppliers and customers, no longer free to bend to the religious organization's will to serve business greed, the mark of the beast, without discipline to sacrifice material gain to love humanity, including elderly or weak employees, in the form of the rule of law, or love written on humanity's heart per Jeremiah 31.

255. Keeping government and religion separate also allows government servants to allow their individual strength in being human, the power to choose to love, and outside appeals to a conscience to govern their character with humility, grace and mercy to better care for the people in their charge.

256. For instance, In the Bible Nathan, a religious leader, courageously confronted the Second King of Israel, King David for sleeping with another man's wife, impregnating her, then conniving schemes to allow the man to have sex with his own wife, to cover up his adultery to no avail, only to set the man up to die in battle.

257. The confrontation allowed King David to repent, to be made clean and saved from the second death in the fires of hell, the last day at the resurrection of the dead.

258. In a similar way, my love for God, and desire for God's will led me to confront government officials in order to prevent harm to me and the population they serve, and in hopes government leaders will conduct their jobs with humility, grace and respect for individual liberty as more important than money earned by performance of their duties

259. I confronted the Delaware Supreme Court when they violated my religious rights to affirm instead of swear into the Delaware Bar. US Ex-Ex 3.

260. I twice rejected appointments to family law matters as violating my religious beliefs. US Ex-Ex 4.

261. I confronted the Courts in Delaware per the attached letter concerning impartiality and bias. US Ex-Ex 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.").

262. I even shared my view on what using the name of God in vain means when I proposed a suggestion to defeat ISIS to Senator Tom Carper of Delaware using words of reason, not weapons and barbaric uncivilized violence. US Ex-Ex 6. I believe it means using the name of God, or religion or scripture for man's purpose instead of a true religious purpose.

263. My love of God, and subordinately my love for others is not a disability. Seeking to protect the freedom to worship, willfully, not under force, threat, conditioning or training of government through its partners, even of diverse beliefs, is something I choose to protect in my religion. There is no love in the government, by the intrinsic power it wields, in forcing its religious-political will, or its religious partner's will upon others under the threat of social, economic or physical persecution. Love must be freely chosen. Otherwise, it is not unconditional love, just conditional, trained, forced behavior. I believe our government is wrong to kill people, even ISIS based on religious-political views, instead of using words of reason.

264. I am insulted by the Defendants claims against me as "disabled," but for my petition in *Kelly v Trump*, religious belief, association and speech. They insult my God. Thinking for myself and believing as I freely choose instead of the trained, conditioned, forced will of the government through entities who value money or professional business over God as a savior, makes me of sound mind. My faith commands me to be separate, meaning do not sin just because the world sins. I should not be required to choose between the exercise of my first amendment rights to worship, speak, associate and petition, even as an indigent pro se party, even imperfectly, and even as an unemployed impoverished party who is licensed to practice attorney, and the maintenance of my license to practice law as active, as Defendants appear to require. I should be permitted the opportunity to work as an attorney, even though I value my faith in God, free speech, association more than work, and am not working at this time in order to stand up for Jesus in court, as a party, not as an attorney, at this most critical time in our nation.

265. During *Kelly v Trump*, I have been, at times, without access to a working

computer, a printer, legal resources, even my vehicle at times, due to lack of means. That does not make me “disabled,” incapable of performing attorney work. It makes me disadvantaged in my own case, where I am not performing attorney representation of others, as I would if I was employed with the adequate tools to conform to attorney work. Defendants require I lose the right to petition the court, as a party, not as counsel, if I am impoverished and without means to advocate as an attorney, or lose my license to practice law, as inactive, preventing me from ever gaining the means to represent others through employment with a law firm and possibly employment at other places.

266. Defendants compel me with the choice between losing my paid for active license to practice law, or losing my ability to exercise fundamental First Amendment rights, deeming me unworthy of Constitutional protections as poor, or they claim disabled because I believe, think, speak differently based on my religious beliefs, in representing myself in case *Kelly v Trump* to safeguard those beliefs.

267. Defendants seek to penalize me as unworthy to exercise my right to petition because I do not have the tools to advocate as an attorney for others at this time because of my unemployment, by taking away my prospect of becoming employed and gaining the tools I would need to represent others.

268. Defendants seek to penalize me as unworthy to practice law due to poverty.

269. Poverty is not a disability.

270. I am not less worthy of protections under the Constitution due to my unemployment, poverty, religious beliefs, association or speech, or exercise of my right to petition which is strongly impacted by my belief in Jesus as God, not business as God, not money as God, not even government as God, as free speech, allows me to criticize even

government in hopes to improve it, and maintain it too.

271. I am filing this case before the Honorable United States District Court in the District of Delaware to enjoin the Defendants retaliation against me for 1. exercise of my religion, speech, association, and right to petition grievances, and 2. for the First Amendment right to petition grievances related to *Kelly v Trump*, to prevent disciplinary proceedings for the exercise of my fundamental rights, based on Defendants' intent to cover up government agents' behavior, or to demean my credibility and reputation to belittle my speech, religion, association or petition for relief in *Kelly v Trump*, based on Defendants disagreement with my beliefs, speech, religion, and petition for relief, or to penalize me for speech, religion, association, poverty, and petitioning the court, as an indigent party, albeit even imperfectly to defend my First Amendment rights against government persecution.

272. All of the rights, my right to petition the court, my free exercise of speech, religion, association are fundamental rights protected under the strict scrutiny standard, and must have a compelling or important justification to retaliate or punish me or violate, narrowly tailored to such justification.

273. The Defendants have no important or compelling justification to interfere with an active case to retaliate against me for 1. my federally protected exercise of religion, speech, association, or the right to petition grievances, and 2. for my exercise of the First Amendment right to petition the court for grievances in *Kelly v Trump*.

274. I am not practicing as an attorney advocate on behalf of another. I am unemployed, and I will seek to gain my old job performing real estate settlements after the pandemic subsides, which will not likely be anytime soon, if they will still be interested in



me, after the Defendants embarrassing initiation of proceedings brought for improper purposes since there is no great need to interfere with an ongoing trial to seek to deactivate my license to practice law, but for the case, to intimidate me into forgoing my case, as an injured unrepresented party, or demean my credibility so as to diminish the effects of my speech, religious exercise or association in the eyes of others, and in the eyes of the Courts, including the United States Supreme Court.

275. It is improper for the ODC to take action against me during an active case that is currently being considered before the United States Supreme Court Case No. 21-5522, with intent to interfere with the law suit or demean my credibility.

276. There is no immediate need for the ODC to act. I am no danger to the public as an actively licensed attorney, not currently practicing law or expecting to practice law on behalf of others since I am holding off on contacting my old law firm until my case *Kelly v Trump* is over, and the pandemic subsides, and now must hold off on renewing negotiations until the issues in this case are resolved.

277. In *Kelly v Trump*, I am merely defending my fundamental rights as a party, not practicing as an attorney, which rights I should not be compelled to waive because of lack of resources attorney advocates need to perform their duties for others, as opposed to acting as a pro se, indigent party.

278. Patricia and the ODC are retaliating against me with an additional intent to inflict emotional distress, or in reckless disregard of infliction of emotional distress, and have caused emotional distress embarrassment, sleepless nights, heart pain. anxiety, grinding of teeth, utter horror, fear, tears, and emotional harm.

279. In the pleadings I indicated the Court staff appeared to demean me of

unworthy of access to the courts because of poverty, religious beliefs or association, which upset me and made me cry. See US-A-4, US-A-5, attached hereto and incorporated herein.

280. Patricia and the ODC Knew or should have known that interference with my exercise of my First Amendment Right to petition to safeguard my civil liberties from substantial burden, by so burdening my free exercise of the right to petition, speech, association and religious belief, by threat of pecuniary harm, taking away my active license would upset me causing emotional distress, embarrassment, humiliation, and pain in my chest. I attached evidence that I exhibited an increased blood pressure and pain in my heart but for caused by government sponsored attacks against me for the exercise of my civil liberties, including my free exercise of religion, speech, association, and freedom to petition the government to address grievances. US Ex-Ex 52

281. In 42 USCS § 1983 actions for emotional distress, embarrassment and humiliation, proof of elements of tort of intentional infliction of emotional distress is not prerequisite for recovery of compensatory damages; it is only necessary for plaintiff to show that (1) plaintiff has in fact suffered emotional distress, embarrassment and/or humiliation, and (2) defendant's actions proximately caused plaintiff's injury. *Aumiller v. University of Delaware*, 434 F. Supp. 1273, 1977 U.S. Dist. LEXIS 15317 (D. Del. 1977).

282. If proven, compensatory damages are available under § 1983 for mental distress. *Agosto v. Aponte Roque*, 631 F. Supp. 1082, 1986 U.S. Dist. LEXIS 27992 (D.P.R. 1986), remanded, 889 F.2d 1209, 4 I.E.R. Cas. (BNA) 1827, 1989 U.S. App. LEXIS 18910 (1st Cir. 1989).

283. Expert medical testimony is not required to prove emotional distress

damages in 42 USCS § 1983 action. *Bolden v. SEPTA*, 21 F.3d 29, 9 I.E.R. Cas. (BNA) 676, 146 L.R.R.M. (BNA) 2065, 127 Lab. Cas. (CCH) ¶ 57650, 1994 U.S. App. LEXIS 6575 (3d Cir. 1994); See, *Flores v. Pierce*, 617 F.2d 1386, 1980 U.S. App. LEXIS 17814 (9th Cir.), cert. denied, 449 U.S. 875, 101 S. Ct. 218, 66 L. Ed. 2d 96, 1980 U.S. LEXIS 3269 (1980), (42 USCS § 1983 are not limited to out-of-pocket pecuniary loss but can also be awarded for emotional and mental distress caused by intentional tort.);

284. There is little question that once constitutional violation is made out under 42 USCS § 1983 plaintiff may recover damages for emotional distress, embarrassment, and humiliation, and in appropriate cases, punitive damages are also recoverable; in order to recover such damages plaintiff need only show that (1) he in fact suffered such damages, and (2) defendant's actions proximately caused plaintiff's injury. *Board of Trustees v. Holso*, 584 P.2d 1009, 1978 Wyo. LEXIS 228 (Wyo.), reh'g denied, 587 P.2d 203, 1978 Wyo. LEXIS 245 (Wyo. 1978).

285. In my petition for a writ of certiorari before the US Supreme, I alleged or referred to through documents emotional distress resulting in physical symptoms, as evidence of the alleged harm caused the Presidents' establishment of government-religion.

286. Patricia and the ODC knew or should have known that attacking me based on my pleadings relating to the most sensitive issue in my life, my faith in Jesus Christ, would cause me additional emotional distress. On October 3 through the 11th of 2021, I did not sleep through the night, and I usually have no problem sleeping soundly. I have foreseeably experienced severe anxiety, clenching my teeth, harming my teeth, tears, and heart pain, as a result of Patricia and the ODC's conduct, which has increased and

intensified the amount of emotional distress based on government agents substantially burdening my religious beliefs, and my speech and petition to address grievances before the court to safeguard my religious exercise of my beliefs.

287. The fact Patricia and ODC may not understand my beliefs or the fact my belief in Jesus Christ or other beliefs may not make sense to them does not justify persecuting me based on my defense of my beliefs by seeking to label me as disabled preventing me from becoming gainfully employed as an attorney or otherwise.

288. At the start of my case in *Kelly v Trump*, I did not have a working computer or a printer. Since the case began, I got a new computer, which broke twice, once after I filed a brief to the Delaware Supreme Court, and secondly on August 23, 2021, after I filed my writ of certiorari with the United States Supreme Court.

289. I just recently got my new computer fixed, but all of my material was wiped clean off of my computer.

290. The last week of September, I was compelled to purchase Microsoft Word to place on my fixed computer in order to respond to the ODC's September 27, 2021 threats by the filing of this Complaint. Preparing this complaint and the voluminous documents is especially tough for me with regards to not only funding, but lack of resources required such as ink, and a working printer, which I also bought the last week of September in order to respond to the ODC's September 27, 2021 threats by filing this complaint.

291. Unfortunately, on October 5, 2021 *Walmart* and *Target* are out of the ink I need to purchase to use on my new printer Epson 522, black. So this reasonably also causes anxiety, which does not make me disabled. It makes me reasonably concerned, compelling me to act quickly with flexibility in order to defend my life, my belief and my livelihood

from government persecution based on exercise of my fundamental rights.

292. The ODC and Patricia knew or should have known that I am of limited means to respond to their threats, since a letter from DE-Lapp alleged, they heard I was having difficulty paying my attorney dues, and I filed in forma pauperis in *Kelly v Trump*.

293. The ODC and Patricia knew or should have known that attacking my religious beliefs, speech based on my beliefs, would cause emotional distress, and upset me even more.

294. The ODC and Patricia intentionally upset me in order to argue the fact I exhibited emotional distress makes me disabled, when it makes me a human with a heart, not a cold heartless person with the mark of the beast written on their forehead, by what I think, my heart and my hand by how I live. The fact I love God, myself and others instead of loving money and material gain makes me a Christian, who are “known by their love.”

295. I sought protection from the court because I was scared I would get shot, and further harmed for exercising my speech, religion and association. I sued the Democrats. I sued Trump. I sought to replace President Trump with President Biden, and a determination as to whether my writ of certiorari is yet to be granted.

296. I drafted 5 articles of impeachment against President Trump, contacted all 541 law makers to impeach. I upset people who support President Trump and President Biden. Yet, I choose to do what is right to please God not man.

297. People have talked about civil war, overturning the government and we recently had an attempt at an insurrection to expunge the election results on January 6, 2020 by violent force.

298. The arms of the court, Defendants, endanger my life in retaliation for my

exercise of constitutionally protected rights and in response by me against court officials for seeking to sabotage, interfere, impede my case. The ODC appears allege my belief in Jesus is crazy and seeks to declare me disabled. The fact I think for myself, not trained, conditional forced thinking based on temptations of reward and punishment, and conditional relationships, praise and ridicule, makes me reasonable of sound mind.

299. I am a Christian, and my belief in God, and my desire to dissolve the establishment of government-religion so I, and others, may worship or not according to the dictates of our conscience, not the dictates of the government through its religious partners is the most important thing in my life.

300. This is real life and Defendants place me in real danger, to be demeaned if something further happens to me, as "crazy." So others may say "do not listen to her." I disagree with both the democrats and republicans and those in power concerning bad ideas that are not solutions because I care about people above money and believe people's free will, freedom to choose should be protected from forced, conditioning, and that laws should correct misbehavior not reward bad business that exploits customers, poisons their food or water, harms their health under the guise of healthcare and pollutes.

301. The arm of the court, ODC, endangers my life in retaliation for my exercise of my constitutionally protected right to petition the court for grievances, and in response to my additional petitions to the Chancery Court and Delaware Supreme Court for relief against court officials or arms of the state for seeking to sabotage, interfere, impede my case.

302. The ODC seeks to declare me disabled, but for and as a result of the fact I filed the case *Kelly v Trump* to safeguard my free exercise of belief in Jesus Christ.

303. I gave my life to God not money. Earning money is not per se evil. When money becomes your savior, your God, to the extent you harden your hearts to loving God foremost, and others as yourself, even the poor, foreigner, the sick, the disabled, I believe that is sin. Love is sacrificing material gain to love God and one another as more valuable than money.

304. I fear God more than I fear Defendants, and I must stand up for my right to imperfectly worship Jesus, freely speak my faith, and associate, and petition the court as a Christian.

#### **SPECIFIC DELAWARE GOVERNMENT AGENT RETALIATION**

305. I write to alert this Honorable Court concerning actions by state government agents taken apparently to impede and obstruct my access to the courts in *Kelly v. Trump*.

306. “The interference with and potential prejudice to the right of access to redress in state court rises to the level of a constitutional deprivation.” *In re Cincinnati Radiation Litigation*, 874 F. Supp. 796, 823 (S.D. Ohio 1995); Citing *Fisher v. City of Cincinnati*, 753 F. Supp. 681, 687 (S.D. Ohio 1990)

307. The First Amendment prohibits state officials, employees, and agents from retaliating against claimants, such as myself, for exercising their right to access to the courts.

308. “Retaliation by public officials against exercise of First Amendment rights is itself violation of the First Amendment.” *Zilich v. Longo*, 34 F.3d 359 (6<sup>th</sup> Cir. 1994), *U.S.C.A. Amend.* 1.

309. The state of Defendants officials intentionally retaliated against me for the exercise of my right to access to the courts, based on their disagreements as to my speech,

religion and association, and beliefs, I seek to protect, even the right to criticize government officials, including Delaware arms and agents, and to stand up for my beliefs, no matter how repugnant the Defendants or others find my beliefs.

310. Arline Simmons (“Arline”), a Chancery court staff member in the state of Delaware, was my friend, prior to impeding my case. At least, I thought she was my friend in real life.

311. Arline advised me telling her things would not get back to the court, and was not the court, when I came to the Courthouse in person, near the inception of the case.

312. Arline was my facebook friend, and I thought my friend in real life too.

313. Arline indicated her support for former President Trump and for the ability of the government to share religious beliefs through its employees, by her communications at the courthouse and online.

314. My case, *Kelly v Trump*, seeks to dissolve government-religion, which conflicts with Arline Simmons beliefs.

315. Arline, intentionally misled me to almost miss the deadline to file an exception to the Honorable Master’s final report, in an attempt to prevent my case from going forward based on her disagreement with my religious, political beliefs. See attached US Ex Exhibit A-4, which includes Appellant’s Motion for the Delaware Supreme Court to rei(g)n 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, with the internal exhibits thereto, Exhibit 55, a December 1, 2020 letter by Meghan to the Honorable Master Patricia W. Griffin (“Master”), regarding Due Process concerns, E-mails attached thereto, and a letter I wrote to the Master, dated October 19, 2020, regarding Plaintiff Not



officer of the Court/Economic Crash/Forum (“US Ex, Ex A-4”).

316. I asked the Master for help. She kindly helped me. Id. At December 1, 2020 letter, my request for help, and District Court Exhibit 11, the Master Patricia W. Griffin’s kind December 7, 2020 letter granting me relief. See District Court exhibit 12, my response to the December 7, 2020 letter.

317. The representatives at the Chancery Court demeaned me apparently based on poverty, association, speech, and religious beliefs. Id.

318. I experienced foreseeable embarrassment, loss of sleep, clenching of teeth, tears, humiliation, hurt and emotional distress as a result of the intentional retaliatory interference with my case to stand up for my free exercise of religion, speech and association without government suppression, manifesting in sleepless nights, which were rare to me prior to this case, clenching of teeth, pain in my heart, and tears at the betrayal of someone I cared about.

319. Arline also instructed me to cross off the address of the civil process clerk, the Delaware local counsel in *Kelly v Trump*, with the intent to prevent the case from going forward based on covering up her misconduct and based on her belief in Trump-religion, both in violation of my first amendment rights. See attached US Ex-Appendix G, attached hereto, which includes therein a letter from me to the Delaware Supreme Court justices regarding the reason for the withheld subpoena to the civil process clerk, and the praecipes, dated October 12, 2020 for President Donald J. Trump, Civil Process clerk for the US Attorney’s office for the District of Delaware, and US Attorney General William Barr, Esquire (“US Ex-App G”).

320. My inability to serve the US Attorney General David Weis in the District

of Delaware, caused great anxiety, confusion and distress. When I discovered the address crossed off, I became heart-broken because I still care about Arline outside of the court case.

321. Arline also kindly offered to allow me to email her documents so I would not have to drive to the library to print documents. She appeared to have the authority during this pandemic to do so. So, I accepted her kind help to keep us safe, especially since the Defendant former President Trump had contracted Covid-19, and I incorrectly thought the US Attorney General William Barr did too.

322. Another Court representative Katrina Krugar indicated Arline and I should stop Emailing, and all communications should be done through Katrina's email instead, during these confusing times of covid 19.

323. Arline and I both complied, temporarily as covid 19 continued to wreak havoc on the skeletal court staff that held up the Chancery Court in person, and I filed a Notice of Exception to a Vice Chancellor, who works with different court staff.

324. In addition, the ODC impermissibly interfered with this case by contacting Judge Kenneth Clark, per Judge Clark's admission, to interrogate me as if I was on trial for exercising my right to petition the Court to safeguard my freedom to worship Jesus Christ without government incited persecution, substantially burdening my exercise of my religious belief.

325. In April 2021, Judge Kenneth Clark ("Judge Clark"), a Court of Common Pleas judge for the state of Delaware judge appeared to threaten me at a local BJ's in Millsboro, Delaware, a bulk grocery store, while acting under the color of judicial and state authority, as if I was on trial for standing up for my faith in Jesus, solely based on retaliation

of my exercise of seeking judicial relief in court for petitioning the court to alleviate the government sponsored burden government-religion has caused on my exercise of religion in the action *Kelly v Trump*.

326. It is improper and unlawful for state actors, especially judges to pressure a party in a case to drop, interfere or impede or prevent my access to the courts.

327. The ODC and Judge Clark clearly violated and encouraged the violation of my first amendment right to petition the courts, by seeking to use their government power, under the color of statutory or regulatory law to obstruct my case, and to retaliate and punish me for bringing my case.

328. The 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, 176 (3d Cir. 2015)

329. Judge Clark and the ODC knew or should have known that seeking to use his cloak of government authority, under the color of regulatory law, as a respected, fair judge to chill or condemn or interfere with my ability to bring this case without government retaliation or pressure, violates my First Amendment Right to petition the Court, and arguably my fundamental right to speak, exercise of religion, and associate relating to my communications in my pleadings in *Kelly v Trump*, and communications in general.

330. My right to a fair, unobstructed trial to alleviate a substantial burden upon my free exercise of religion is a constitutional right.

331. "Congress, the Executive, and the Judiciary all have a duty to support and

defend the Constitution.” *Salazar v. Buono*, 559 U.S. 700, 717 (2010); See, See *United States v. Nixon*, 418 U.S. 683, 703, 94 S.Ct. 3090, 41 L.Ed.2d 1039 (1974) (“In the performance of assigned constitutional duties each branch of the Government must initially interpret the Constitution, and the interpretation of its powers by any branch is due great respect from the others”).

332. “There is no ‘de minimis’ defense to a First Amendment violation.”, *Doe v. Indian River School Dist*, 653 F.3d 256, 283 n.14 (3d Cir. 2011) (“*Elrod v. Burns*, [427 U.S. 347, 374, 96 S.Ct. 2673, 49 L.Ed.2d 547](#) (1976) (“The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.”); see also *Schempp*, [374 U.S. at 225, 83 S.Ct. 1560](#) (“[I]t is no defense to urge that the religious practices here may be relatively minor encroachments on the First Amendment.”))

333. I will suffer irreparable harm if injunctive relief is denied.

334. ‘The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.’ ” *Mullin v. Sussex Cnty.*, Delaware, 861 F. Supp. 2d 411, 427 (D. Del. 2012); Citing, *Indian River Sch. Dist.*, 653 F.3d at 283 n. 14 (quoting *Elrod v. Burns*, 427 U.S. 347, 373, 96 S.Ct. 2673, 49 L.Ed.2d 547 (1976)).

335. I will face irreparable injury to my exercise of my speech, association, and exercise of religious beliefs by the government burden Defendants seek to cause upon me from such defamatory title, “disabled,” embarrassment, emotional distress, lack of future employment, harm to my reputation if an injunction is not granted to prevent the Defendants from retaliating against me for exercise of my First Amendment Rights by bringing an action to declare me “disabled” but for my exercise of my First Amendment

rights.

336. 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.

337. I am permitted to believe differently than the government through its agents, even if what Jesus teaches, my beliefs, seem foolish or crazy to the Defendants. 1 *Corinthians* 1:18, 2:14-16.

338. I am disappointed in Judge Clark, and have high regards for him, but he knew better, as Arline knew better, De-Lapp knew and the ODC knew better than to obstruct and impede and seek to prevent my access to the courts in violation of clearly established law, the first amendment.

339. “A Government official's conduct violates clearly established law when, at the time of the challenged conduct, ‘[t]he contours of [a] right [are] sufficiently clear’ that every ‘reasonable official would have understood that what he is doing violates that right.’” *Werkheiser v. Pocono Twp.*, 780 F.3d 172, 176 (3d Cir. 2015); *Citing, Ashcroft v. al-Kidd*, 131 S.Ct. 2074, 2083, 179 L.Ed.2d 1149 (2011) (quoting *Anderson v. Creighton*, 483 U.S. 635, 640, 107 S.Ct. 3034, 97 L.Ed.2d 523 (1987) (all alterations in original)). “In determining whether a right has been clearly established, the court must define the right allegedly violated at the appropriate level of specificity.” *Id. Citing, Sharp v. Johnson*, 669 F.3d 144, 159 (3d Cir.2012).

340. The Defendants obstruction of my access to the courts and retaliation against me for seeking to petition the Court concerning civil rights is clearly violating my First Amendment rights to petition the court.

341. “The opportunity to be heard is an essential requisite of due process of law in judicial proceedings” *Richards v. Jefferson County*, 517 U.S. 793, 798 n.4 (1996).

342. I wrote a letter to directed to the Honorable Chief Justice Collins J. Seitz, Junior of the Delaware Supreme Court (“Chief Justice”) under the suggestion of Mark Vavala, a former commissioner, and agent of the Delaware Bar Association, seeking a waiver of attorney registration fees during the pandemic, as the pandemic prevented me from working at my old law firm. See US Exhibits US Ex-Ex A-4 and US Ex-Ex-A-5, and District Court Exhibit 13, the January 7 letter where I made my request for exemption of fees.

343. On February 2, 2021, the court sent a letter indicating:  
“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 an assessment fee waived must file a formal request. The Cort will take each request under consideration as received and act appropriately.” Citing, the letter contained in US Ex-Ex-A-5.

344. On February 5, 2021, I responded to the Court’s February 2, 2021 letter in part:

“...is accepting applications for waivers on a case by case basis violates the Equal Protections Clause applicable to the states agencies, even the courts via the 14<sup>th</sup> Amendment, 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 lawyers 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...” US Ex-Ex-A-5

345. I paid the filing fees for my active attorney license to practice law on February 6, 2021 in the amount of \$353.00, since no relief was granted by the court, per my request. See US Ex-Ex- A-5.

346. After such fees were paid, De-Lapp, a disciplinary arm of the court, so tied with the government it is considered a government agent, reached out to me offering to allegedly help, in the attached, May 24, 2021 attack letter.

347. In the May 24, 2021 Carol Waldauser and Eleanor Kiesel state, “We understand that you are experiencing some financial difficulties with regard to license fees.”

348. They did not reach out to me to offer economic help since such fees were already paid, but to connive to gather evidence to retaliate against me, punish me, for my exercise of my first amendment rights.

349. Two people knew of my request to suspend attorney license fees, the Delaware Chief Justice Collins J. Seitz, Jr. (“Chief Justice”) and Mark Vavala.

350. I filed *Appellant’s motion for the Delaware Supreme Court 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*, dated May 25, 2021, with the Delaware Supreme Court, with no relief from the Court. US Ex-Ex A-4.

351. I filed *Appellants Motion for the Delaware Supreme Court to require the recusal of the Honorable Chief Justice Collins J. Seitz*, dated May 28, 2021, with the Delaware Supreme Court, with no relief from the Court. US Ex-Ex-A-5.

352. It appeared the Chief Justice may have contacted the ODC, since Mark

Vavala appeared to prove he was not the one who told about my fee waiver request.

353. Since only two people appeared to know of my request, and one of those two appeared to make a complaint to the arm of the court, DE-Lapp, recusal should be required of the Chief Justice in *Kelly v Trump*.

354. A judge should not interfere with a party's case, my case or intimidate a party, intimidate me, or give the appearance of interfering or intimidating a party, me, before his court with knowledge that such interference would violate my First Amendment rights, my right to petition, exercise of speech, association and exercise of religion, based on my exercise of my right to petition the court to address grievances, including but not limited to the right to petition the Court for exemptions for attorney fees, the right to petition for relief from the arms in its charge to prevent an unfair trial, and the right to petition the court against grievances in *Kelly v Trump*.

355. It is the right to petition for relief without government retaliation that must be protected, not the guarantee that such relief will be granted. It is the opportunity at justice that must be protected and not taken away based on retaliation for the exercise of the right to petition, not taken away based on the exercise of speech, religious beliefs, or association, or even based on poverty, and the lack of resources an attorney advocate would ordinarily have if she should be representing a party, or even errors, or mistakes.

356. Perfection is not a requirement for an American to have the right to petition.

357. My speech concerning my beliefs and faith in Jesus may appear crazy to others, and yet even unpopular beliefs are protected. *Cantwell v. State of Connecticut*, 310 U.S. 296, 60 S. Ct. 900, 84 L. Ed. 1213 (1940). Nevertheless, I have the freedom to believe by the dictates of my conscience, no matter what the government through its agents



believes. 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.

358. 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. I believe organized charity, fundraising, pro bono, and volunteering is no small sin. It is not true charity, but damns people to 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. Jesus teaches you cannot serve God and money. I choose God.

359. I believe churches taking government money to perform business on behalf of the government per the executive orders I sought to eliminate in *Kelly v Trump*, under the guise of charity mislead people to hell as they harm others on their way should they not repent, by teaching business is love, driving out love (“God,” since “God is love”), from the hearts of men replaced with the love of money or material gain. Jesus taught, do not give charity seen like the hypocrites who will have no reward from the father, meaning they will be damned to hell, without eternal life. When you give do not know your left hands from your right, meaning do not give to get, no matter how slight, in the form of favors, tax breaks or marketing, and your “father will reward you in secret,” meaning you will escape being thrown into the fire to be no more on judgment day.

360. My personal beliefs and speech relating to those beliefs do not make me disabled.

361. I believe people go to hell for trusting in what mental health employees and healthcare employees sell.

362. I have religious objections to mental health care and healthcare.

363. As stated in my writ of certiorari and in a Motion to the Delaware Supreme Court,

“...I informed the DE Supreme Court of some of my religious objections to alleged healthcare...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 B(F) 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.” See, Ex US, Petition.”

364. Carol Walhauser created the appearance of a threat by her comment requiring a response within ten days.

365. I have the freedom to chase after God’s will instead of chasing after money.

366. 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, as savior, which I believe leads to damnation in hell.

367. I believe business greed, and conditionally caring based on relationship, reward and avoidance of harm, without any unconditional love, 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.

368. Defendants' attacks against me in retaliation against me, made me cry as I relived the retaliation against me based on my petitioning the court for help by another arm of the Delaware Supreme Court who economically persecuted me to protect those with a shared interest.

369. This is not the first time the arm of the Delaware Supreme Court retaliated against me for exercise of my right to redress grievances with the government.

370. When I took the Delaware Bar, I stayed in a dorm at Widener Law School as I took the Delaware Bar, my ceiling leaked and caved in destroying my bar material. I requested replacement bar material. I waited a week or two, and then complained to either the Board of Bar Examiners or the Court.

371. An official in charge of the Bar at Widener, a partner with the Board of Bar examiners yelled at me for making him look bad.

372. I received bar materials, but a complaint was filed against me for asking help, delaying my admission to the Delaware Bar.

373. I passed the Delaware Bar on the first try, during the summer of 2006.

374. After my name was listed as passing, I was offered multiple jobs.

375. On November 20, 2006, I accepted an offer by Richards, Layton and Finger ("RLF") on a year contract for \$135,000, a year. District Court Exhibit 14.

376. The Board of Bar examiners indicated my admission to the Delaware Bar

would be delayed pending psychological examinations.

377. In 2006, some of my peers wrote recommendations for me, or reached out to me, including Travis Turner who confirmed that I was not disruptive or even noticeable at the bar review course located at Widener Law School, and Chip and Dan O'Brien, who also attended the Bar review courses. District Court Exhibit 15.

378. Many other people have vouched for my good character by drafting letters of recommendations, including but not limited to Judge Leah Chandler and Mr. George Cole, the longest serving Delaware politician who served in one seat, attached hereto and incorporated herewith, as District Court Exhibit 16.

379. I told RLF my admission would be delayed.

380. On or about December 11, 2006, I filed a complaint in the Delaware Supreme Court for the Board of Bar Examiners to show cause. District Court Exhibit 17.

381. My law firm, RLF, required I withdraw my complaint to keep my job, and required I comply with the Board, which violated my religious belief.

382. The Board required I undergo psychological examinations, which violated my religious belief as I believe psychologists and mental health professionals will go to hell along with those they treat by seeking to bend people's free will to conform to the desired will of the world by giving into temptations of desires instead of laying down desires to do God's will. District Court Exhibit 18.

383. Under threat of loss of job, I sinned against God by complying, making a counselor more money, and faced anxiety, embarrassment and emotional distress for violating my religious beliefs while being insulted and humiliated by examination of psychologists, who behaved as Satan, acting as God determining if my free will conformed

with the dictates of the evil world.

384. I believe mental health specialists, behaviorists like B. F. Skinner, and psychologists teach the mark of the beast and will be damned to hell, as they mislead others, including their patients there with them, should they not repent and be saved with the truth.

385. I believe Mental health counselors, behaviorists and psychologists teach people to conditionally care based on feelings, relationship, reward and avoidance of harm, based on desires, not laying down desires to love God and one another.

386. Please note, Jesus teaches most people will go to hell. See *Luke 13-28*, *Matthew 7:13-15*, also see *Isaiah 10:22*, only a remnant of Israel is saved from destruction in hell the last day. Wide is the way to destruction, meaning many different thoughts, action and inaction may forever damn people to hell, should they not repent, be made clean and saved by truth in love, instead of lusts, making.

387. I become licensed to practice law in Delaware, but RLF did not renew my contract.

388. I regret listening to RLF, a business concerned more about making money and their business appearance relating to me.

389. Where false accusations arise in retaliation for complaints against authority, reputations may be tarnished to conceal mistakes and misbehavior by those in power as the Board of Bar examiners did to protect their private partner at Widener Law School, and as the Defendants are doing towards me in retaliation for my petitioning the Court for relief. See, *Acts 24:5*, Paul was called a troublemaker for shining light on evil, on sins, just like Jesus was persecuted for shedding light on darkness, sins, in hopes to transform darkness into light. As I hope the courts choose to do in all cases, repenting

when they make mistakes, reflecting the image of God by saving not only lives, but eternal lives too by love and correction to prevent condemnation, instilling hope “70 times 7.” *Matthew 18:22.*

390. I regret listening to a superior at RLF, instead of doing what was right by standing up for myself as I am a child of God, not man’s to exploit for material gain or for conditioning my will to conform to the will of the world’s for the convenience of others.

391. If I was still working at RLF, I would have made well over two million dollars by now.

392. I was a nervous wreck as I was examined under the microscope of people who desired their own convenience, money or prestige, not the desire to safeguard my individual liberties, including the right to petition for grievances against the Board of bar examiners partners at Widener, and my right to freely worship my religion without government agents substantially burdening my free exercise of religion to the forced, compelled exercise of their will, similar to now, making me relive painful experiences.

393. Prior to that in law school at Duquesne School of Law, I had rats in my apartment the last semester and during bar exams. I complained to those in authority and was similarly punished by them for asking for help.

394. Duquesne, a Christian Law School responded by blaming me and hiking up the rent, just like the Board of Bar Examiners and the Defendants responded to my petitions for relief by retaliating against me and punishing me.

395. 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 Pennsylvania Bar on the first try. I got super high scores the second time and allegedly high scores in Delaware passing the Delaware bar on the first try. I should not be ashamed. I was disappointed in the cold heartedness by the officials of a Christian law school. Please see Exhibit 19 Duquesne, a CD where I saved a file to be opened as a file not as a CD, of a news clipping where newscasters tried to help me. Also see, District Court Exhibit 20, a newspaper article where the news reporter tried to help me.

396. The Defendants retaliation for my petitions, and their attacks against me, made me relive the horrors of other times I asked for help, and got in trouble for asking for help, like I am in trouble, for asking for help now, except this time I am in even greater harm.

397. I have been a nervous wreck as this experience is traumatic, going through it alone, with little resources or help. My heart has been hurting pretty badly.

398. The government threats by Delaware government officials, Judge Clark, De-Lapp, ODC, Patricia and Defendants conspiring to seek to suppress my free exercise of religion, speech, association, and right to redress grievances, under the facts of the case., but for my petition for grievances violate the First Amendment applicable to the Defendants pursuant to the Fourteenth Amendment, and caused emotional distress.

399. The threats continued. On August 23, 2021, the ODC attached a letter to an Email, which I have not received by US mail, signed by Defendant Patricia B. Swartz, stating:

“This Office has reviewed several pleadings you have filed in the Court of Chancery and the Supreme Court in connection with the law suit *Meghan Kelly v. Donald Trump*. The content of these documents raise serious concerns as to your mental fitness to practice law... Therefore, the ODC requests you voluntarily submit to a mental health examination to determine your fitness, and mental capacity to practice law. This Office has scheduled an examination with Joseph C.



Zingaro, PH.D., located at 1129 Airport Road, Milford, DE 19963 on Tuesday September 7, 2021 from 1:00 p.m. to 4:00 p.m. If you do not submit voluntarily to the above referenced examination, the ODC will petition the Board to order such an examination.” District Court Exhibit 21.

400. I responded to the ODC’s E-mail dated August 23, 2021:

“Desist in contacting me to interfere in my case. No, I will not be evaluated. I have religious opposition to mental healthcare and healthcare. Do not interfere with my case any further. I am trying to file a writ of cert as we speak. Stop impeding justice, to bend my freedom of conscience to your will. My belief in Jesus may appear to be crazy to you, but my freedom to believe as I choose is a protected right, same as the... right to an unobstructed trial. Desist in contacting me.” District Court Exhibit 22.

401. I rushed to the law library to file my writ of certiorari to the United States Supreme Court relating to *Kelly v Trump* the same day, August 23, 2021, with some errors, under great duress, since I believed the August 23, 2021 letter was meant to discourage and distract me from appealing the Delaware Supreme Court’s determination before the United States Supreme Court.

402. I tried to get on the internet at the law library, after I electronically filed, and my lab top stopped working, that day, August 23, 2021.

403. I filed *Kelly v Trump* case as an injured party, not as an attorney.

404. I am not practicing law at this time, and do not expect to practice law, until my case is over and the pandemic subsides when it is safer.

405. I filed as an aggrieved party, despite my poverty and lack of resources for expenses such as a phone, working computer, gas, printing, paper, and legal tools, because standing up for my free exercise to worship God without government sponsored suppression was and is risking mistakes.

406. I am scared for my life. People have been killed based on perceived

government-religion and government-religious beliefs.

407. I live in a pro President Trump area, where some people see him as God's anointed, and see me as a "demoncrat." or antichristian, since I do not support former President Trump, and because I am a democrat.

408. Someone talked about shooting me based on stickers I had on my car that indicated "No one is above the law. No one is below the law," and "Impeach," to impeach former President Trump.

409. Someone actually threw a substance all over my car and stickers.

410. An out of state stranger, proclaiming to be from Maryland, took off his mask and yelled at me, while getting uncomfortably close, accusing me of supporting President Biden. I feared he was potentially subjecting me to covid19. I did not know how an out of state stranger knew I did not support President Trump. I thought it might have been because I proposed five separate articles to impeach former President Trump on and contacted all 541 federal members of congress concerning the articles.

411. I have been visibly shaken up by the court's attacks and interference in *Kelly v Trump* particularly Arline, Judge Clark, DE-Lapp, and now ODC based on my exercise of speech, religion, association and petition.

412. Seeking to trivialize my requests to be free from retaliatory behavior by government officials for exercise of my right to petition, freely speak, exercise religion and associate, by demeaning my character as mentally unfit for the practice of law, is an improper purpose for the ODC to interfere in an active case regarding fundamental rights, with no important justification.

413. The ODC intentionally threatened me with the August 23, 2021 letter to

interfere with my appeal, by distracting me, causing alarm, in retaliation for the exercise of my speech, religion, association and right to petition the court.

414. The ODC knew or should have known *Kelly v Trump* was an active case, and that conspiring to interfere with a party in an ongoing case to obstruct justice is unlawful as violating the First Amendment applicable to the Defendants pursuant to the Fourteenth Amendment, thereby eliminating qualified immunity.

415. According to the US Supreme Court Docket relating to *Kelly v Trump* 21-5522, my petition is not even going to be distributed for conference until October 29, 2021, the last business day. District Court Exhibit 23.

416. There was no great threat to an important government interest, narrowly tailored to address such interest, that justified the ODC's conspiracy to interfere with my active case that justified infringing upon my fundamental right to access to the courts.

417. In fact, there is little government interest the ODC has other than to destroy my reputation and credibility, based on my speech, religion, association, which at times is critical of government agents.

418. Qualified immunity does not shield Patricia, and the Defendants since (1) the official, Patricia, and Defendants violated a statutory or constitutional right(s), and (2) the rights were clearly established at the time of the challenged conduct.

419. I was so upset, on August 28, 2021 I E-mailed Patricia, Mr. Zigarro, and Ms. Burskirk,

“This email is to confirm, I will not be evaluated, as such evaluations violate my religious beliefs. I alerted the US Supreme Court to the same in my petition for the writ of cert., relating to emotional damages related to the President's conduct. Desist impeding in my access to the courts without government obstruction and retaliation for my exercise of my first Amendment rights. I am an injured party, not an attorney practicing in this case. A Court staff member sought to sabotage

my case by misleading me to almost miss the filing deadline to appeal the Master's final report, dated November 2, 2020. That same staff member instructed me to cross off the civil process clerk's address on a praecipe to impede the case from going forward. That member objects to my religious association beliefs in support of Trump and government agents exercise of religion while governing. Judge Clark also sought to interfere with my case. Government and court attacks against a party in an active case to impede justice, based on my case, is inappropriate and unlawful. I do not seek disciplinary recourse at this time should this arm of the Supreme Court and other members of the government refrain from persecuting me based solely on exercise of my Constitutional rights based on religion, association or poverty. Thank you" Delaware District Court Exhibit 24.

420. On September 27, 2021, Patricia and the ODC again threatened to take action to place me as inactive, disabled attorney status, in retaliation against me for the exercise of my First Amendment right to free speech, to freely exercise my religious belief, association and to petition the government for redress of grievances and in direct violation of the First Amendment right to petition the government. District Court Exhibit 25

421. In the attached letter, incorporated herein by reference as an exhibit, District Court Exhibit 25, dated September 27, 2021 Patricia and Defendant wrote:

"By letter dated August 23, 2021, this Office advised you of its concerns regarding your fitness to practice law. As such, the Office of Disciplinary Counsel requested you voluntarily submit to an examination with Joseph C. Zingaro, Ph.D. You declined and the examination has been canceled. I am writing to notify you, pursuant to Procedural Rules 9(b) and 19(c) of the Delaware Lawyers' Rules of Disciplinary Procedure, that on Wednesday, November 3, 2021, this Office will present to a panel of the Preliminary Review Committee ("PRC") a petition to transfer you to disability inactive. You may, if you choose to do so, send a written statement to this Office for submission to the PRC. Any such written statement must be received by this Office no later than the close of business on Tuesday, October 26, 2021. If we do not receive your submission by the deadline, it will not be sent to the PRC in advance. This matter is serious, and you should consider retaining counsel." District Court Exhibit 25.

422. I sought relief from the court for protection against government retaliation for my free exercise of religion, speech and association, only to my shock to be persecuted for the same by retaliation by the defendants for the exercise of my fundamental rights.

423. This is a traumatic for me to ask for help only to be penalized, as a result of my petition.

424. The Defendants behavior would deter a person from continuing their lawsuit, despite the fact it did not stop me, albeit it shook me up and caused me to rush with more mistakes.

425. The fact that I am undeterred from the exercise of my constitutional rights does not eliminate the right to a fair trial without government attacks. *See, Mirabella v. Villard*, 853 F.3d 641, 650 (3d Cir. 2017).

426. Per *Adams v. Ross Twp.*, No. 2:20-CV-00355, 2021 WL 972520, at \*5 (W.D. Pa. Mar. 16, 2021),

“The Third Circuit has held that ‘[w]hether an act is retaliatory is an objective question.’ (citations omitted) To determine whether an act is retaliatory, a court therefore assesses ‘whether the act would deter a person of ordinary firmness, not whether the plaintiff was deterred.’ (citation omitted) As the *Mirabella* Court explained, there is good reason for this objective rule: Government officials should not be rewarded for “picking on unusually hardy speakers”

427. The Defendants conduct would objectively deter a party from continuing suit, which I brought to prevent government suppression of my religious exercise, free speech and fundamental right to associate, while maintaining my individual liberties, including the right to redress grievances in a court of law.

428. Defendants, under the color of statutes and the law sought (seek) to deprive me of rights, privileges and immunities secured by the Constitution and laws, including my freedom to worship by the dictates of my conscience without government suppression and persecution, free exercise of association, free exercise of speech, and the right to redress government grievances in Court without outside government persecution by those wielding

government power, and my active license to practice law.

429. 42 USCS § 1983 specifically affords injunctive relief against Defendants' conduct, seeking to penalize me for the exercise of my Constitutional rights because my religious beliefs, speech or association are repugnant to government actors, or they disagree with my speech, or seek to hide or conceal it or diminish my character as a means to persuade others not to listen to my speech.

430. It is unconstitutional to conspire to impede access to the courts and to impair a fair trial, as defendants have done.

431. I hope my old law firm still will hire me back to perform real estate settlements, in spite of the fact I am standing up for my unpopular religious beliefs.

432. The Defendants conduct seeking to place me on inactive disability status would prevent me from gaining employment with my old law firm or other firms, causing irreparable harm to my reputation, my livelihood, and my quest to serve God by proposing just laws and policies to care for people, not exploit or oppress people to serve artificial entities without hearts who run on money and conditional labor, with no power to do good, as I believe only individuals can reflect the image of God by unconditional love.

#### RELIGIOUS BELIEFS

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

434. I am a Christian.

435. I believe in God, the Father.

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

437. I believe in God the Holy Spirit.

438. 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.

439. 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.

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

441. I find guidance in the Holy Spirit.

442. I find guidance in God, the father.

443. I find guidance in the Bible.

444. Jesus teaches call no one teacher, but God, call no one master, but God. We sin against God by making man, an expert our God by being our guide. We sin against God by making a leader who may mislead us our God by being our guide. Many people are dead in sin, misled by their own desires and imperfect man who misleads them to harm and hell per God. They go to hell for hardness of head, not giving their life to know God, in order to love God.

445. Jesus teaches many people try to go to heaven, doing things in his name, believing they will go to heaven, but misunderstand and will be thrown into the hell on the last day at the resurrection of the dead from their graves for judgment. Choosing to trust in man in place of God misleads people to harm and hell. Luke 13:23-28.

446. Faith requires we seek to know God's will, actually know it, willfully do it, to show love for God. There is mercy as we get it wrong and learn, but only damnation to

the hard headed, the stubborn and the proud who refuse to use their own conscience mind to know truth, to seek God with all of their heart, mind and life. It is great sin to rely on mere human teachers and leaders in place of God, to be our guide, our God.

447. 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.

448. 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.”")

449. 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 will be 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.)

450. 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.)

451. 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.

452. I believe the Defendants sin against God when they look after their own

interest, the interest of the reputation of the Delaware bar, or money, instead of the people they are charged to care for.

453. Artificial entities without hearts, like the ODC, per se, reflect the image of the devil, by absence of love, running on conditional labor, regardless of whether they are paid or not, or money, based on conditional collective entity interest with no power to do good by reflecting the image of God by unconditional love.

454. People withing the entities such as the ODC, are stronger than the conditional conformed will of the whole, since they have free will, to think, to care, to love unconditional, beyond the organizations', conditional existence, and conditional collective will, not free will.

455. The members within the such as the DOC, and Delaware Bar association have a conflicts of interest which tempts them to reflect the image of the devil by placing self-first, their collective, conditional uniform interests first, reputation of partners, the courts, their salary, their families, their colleagues, their convenience, or their reputation above doing what is correct by examining facts impartially, and by intentionally or recklessly impeding my case with intent to obstruct my case and with intent to punish me for their disagreement with my speech, association, religious beliefs and requests within my petition, unlawfully violating the First Amendment applicable to Defendants pursuant to the Fourteenth Amendment. Satan wanted to be as high as God, not leading by sacrificing to self to serve God foremost and one another, as self. Isaiah 14.

456. Over the years, I have recognized that the members of the bar organizations sections tend to look at proposed laws with the mind set of what will be easier for lawyers, what will bring lawyers more money with less work, what gives lawyers more freedom,

less regulation, instead of doing what is right by looking to care for the best interest of the people we are charged to serve upon acceptance of work, real estate settlements or cases.

457. This inherent conflict of interest of self-first mindset, of members or partiality towards perceived partners, even the courts, within our professional organizations, collectively diminishing the free will of individual members to a conditioned will to form across the board professional standards, stifling innovation created by something more valuable than money, the minds of the individuals. So professional standards guarantee worse for consumers, and harsh penalties towards professionals who care to use their conscience mind to care for consumers outside of the standards, stifling free debate to improve, by the forced will of professional standards.

458. Individual liberties are lost to artificial entities without hearts and souls who exist based on conditional labor, not unconditional love and money.

459. Defendants have a conflict of interest to hide misbehavior and misconduct by their partners, the courts, instead of upholding the impartiality of the courts and preventing abuse by allowing government agents to knowingly or with reckless disregard impede justice in my case and punish me based on my religious beliefs, association, poverty, even as a destitute attorney, and my petitions for relief to protect my free exercise of religion without government suppression, to protect my right to petition without government obstruction, or punishment based solely on those rights, and to protect my right to petition the court for relief, suspension of attorney filing fees.

#### UNEMPLOYMENT-HEALTHCARE-RELIGIOUS BELIEFS

460. I have religious beliefs that governed my choice not to work the past two years. Over the past two years, I proposed articles of impeachment and shed light on unjust

laws to prevent condemnation in hell and harm here.

461. I believe justice in the courts is a command by God. *Amos* 5:15. Justice in the courts is a greater law, superseding laws merely related to monetary and material laws, per Jesus the Christ. *Matthew* 23:23.

462. I believe justice is guiding people to know they are loved, respected as worthy of life, unconditionally, unearned, required by God, and to care about others, unearned, unconditionally, or get corrected in court for exploiting, harming or oppressing others to serve your own by the love of money or otherwise.

463. The Bible teaches ignorance, blindness and dumbness, not knowing of the harm and oppression towards others, is guilt worthy of condemnation in hell, per God, should people not repent. See, e.g. *Hosea* 4:6 “My people are destroyed for lack of knowledge: because thou hast rejected knowledge, I will also reject thee....” See, *Matthew* 13, Only those with understanding were not destroyed. See, *Isaiah* 56:10, “Israel’s watchmen are blind, they all lack knowledge; they are all mute dogs, they cannot bark; they lie around and dream, they love to sleep.” Also see, *Matthew* 15:14, “Leave them; they are blind guides. If the blind lead the blind, both will fall into a pit.”

464. I believe courts have the power to safeguard life here, and eternal life by justice through correction, guiding, not condemning, instilling hope “seven times seven,” and alleviating wrongs that hurt people for business greed, not good. *Matthew* 18:22. I believe Courts disobey God when they judge people as God, making themselves God, by discouraging hope and repentance, and by encouraging wrong doers to hide evil allowing it to fester and spread, instead of rebuking wrong doers out of love in hopes to transform them into right doers, potentially preventing harm here, and damnation in hell for eternity.

465. Many of our laws and policies reward evil as good. I sought to prevent injustice guaranteed to safeguard life and eternal life by taking time to propose just laws, policies and to draft articles of impeachment for God, not money, without pay.

466. Whenever the Bible says “woe to you,” I understand that to mean, damned to hell are you should you not repent by unhardening your head, heart and hands, by reflecting love, not absence of love for others unconditionally, not based on relationship, reward or avoidance of harm.

467. God in *Isaiah* 10:1, teaches “Woe to those who make unjust laws, to those who issue oppressive decrees.” Meaning, law makers will be damned to hell for unjust laws despite potentially not knowing and compromising evil for good should they not be corrected by courts or otherwise.

468. I tried to propose laws over the past two years to congress, and proposed articles of impeachment to prevent oppressive decrees, that harm people, and damn law makers to hell. I believe compromise is injustice guaranteed, and is wrongly praised as good.

469. I believe the courts can balance the other two branches by giving guidance and removing unjust decrees that make us less free by violating not only the Constitution but God’s law of love too. I believe the Courts analysis of the laws to determine their unconstitutional impact may save otherwise “twice dead” law makers from hell and harm here. *Jude* 1:12

470. The Bible teaches people go to hell for not knowing, misunderstanding, confusion. *2 Corinthians* 4:4, also see *Matthew* 13. Courts have the power to help them know and be a life saver and eternal life saver by guiding those misguided by desires back

to laying down selfish desires to care to love one another as themselves per just decrees.

471. I took time off to serve God, without pay, by drafting articles of impeachment, and to propose other legal solutions to alleviate or prevent foreseeable harm without pay. I filed *Kelly v Trump*, C.A. No. 2020-0809-PWG (Del. Ch. Nov. 2, 2020), in the Delaware Chancery Court to serve God and safeguard my God's name as holy because I love God, and seek to worship him without government sponsored burdens and persecution. If I was working, I would not have been able to file the law suit, as it would likely turn business away from my employer.

472. Secondly, I have religious reasons related to the pandemic for not working. I am a Christian. I believe people go to hell for prescribing and accepting our harmful health care. Since we are in a global pandemic, I am seeking to avoid getting sick, to avoid being damned to hell by forced healthcare that may kill my life and eternal life. I actually wanted to go back to my old law firm, and was negotiating for a position, but the pandemic hit. And, I decided it was not worth the risk of losing my life and eternal life at this time, should the law firm still be interested in me in light of my unpopular beliefs as a believer in Jesus the Christ.

473. I have religious objections to healthcare and studied the history of horrors of healthcare in a class at UD. I believe more evil is done by health care professionals and mental healthcare professionals than any other industry, even the military, because of the deception that they save lives only to destroy lives and destroy eternal lives in the second death for money. The fact doctors and nurses were doing what the industry and the professional standard told them to do across the line, does not prevent harm or sadly, I believe, their damnation in hell for not seeking to know, and for failure to repent of

hardness of hearts for cold hard cash.

474. Just laws are a way to prevent health care workers from damnation in hell by eliminating unjust laws that reward wrong doing, making it profitable to use people as test dummies or as human commodities for profit, or providing comfort care making people feel better instead of be better.

475. When I was young at UD, I remember learning that charities used people as test dummies in Africa, under the guise of healing them to only harm patients by causing cleft palates. Then, the same wrong doers used the alleged shield of charity or not for profits to gain monetary interests by marketing, fundraising or tax breaks to correct the harm they caused by using people as lab rats, essentially selling patients' souls for money while behaving like devils, unknowingly or not, by teaching the lie they seek to help people, only to harm them for business greed.

476. I observe the same wrongs continued. Pharmaceutical entities who have paid out money in law suits may still be rewarded some of the roughly 33 billion a year in NIH fundings. People within entities, investors or otherwise, are permitted to make money off of the alleged cure too, despite judgments against them, through their entities which shields them from personal concern or responsibility. Injustice continues. I believe money is not the solution. Just laws and justice in the courts is the solution.

477. I believe our forced industry system, stemmed in a forced market by money, grants, donations to colleges or entities market, backed by professional standards accepted by the court across the board stifles innovation and improvements than an otherwise free market would create. Our current system eliminates free will, by the forced, conditioned, controlled will of those who buy or barter for the government official's partiality through

donation, praise or otherwise, making everyone else no longer free, but for sale in a take it or leave it economy.

478. I believe nurses and doctors are still damned to hell for not knowing treatment causes harm. Preventing their punishment for straying from the standards to use their free will, their brain, to think, to care, to know, to love those they serve, safeguarding patients above pockets, is a just policy. Also protecting those the court is correcting by preventing injustice guaranteed by relying on professional associations which per se, value the bottom line more than humanity. Since associations run on the bottom line, unable to reflect the image of God by love.

479. HIPPA protects profit, not patients, as attorneys cannot easily obtain nonparty medical records to show that doctors knew or should have known of the harm or potential harm to patients. Guiding health professionals through correction, not condemnation in court by hefty monetary damages, will prevent future harm to patients and may save healthcare workers' souls by teaching them to use their own brain, free will, to care to know, to better care for the patients they are charged to serve.

480. I also believe healthcare professionals sin by taking the life blood, or organs from people to perform studies on or to use on other patients. See, Leviticus 17:14, Genesis 9:4-5. I only realized this recently as I looked into sinister tests of blood for wicked gain, not good. See, <https://www.bbc.co.uk/bbcthree/article/347828f8-6e7f-4a9b-92ab-95f637a9dc2e>

481. I believe testing blood is sin. I also believe people go to hell for cremation or for grinding up bones. So, I do not eat things with gelatin or gel cap medicine in them. By cremating bones people show they do not care to know God or love God. God teaches



our loved ones are not in heaven or thrown into the fire of the second death yet. The bible teaches about the resurrection of the bones with a potential new body to be judged for eternal life or the second death. See, e.g. *Revelation 20:13*, *Ezekiel Chapter 37*, *Matthew 25:32-46*. Many self-proclaimed Christians sadly adopt this pagan belief that the dead are already in heaven and hell. That is not what God, the father, Jesus, the son, or the holy spirit teach. It is an eternally deadly error to teach lies as truth, to give comfort in a lie, without repentance. Throughout scripture we learn people are damned to hell for adding to scripture or getting it wrong should they not correct themselves. Yet the watchmen are damned to hell for failing to share truth too. I know God. I am placing my life and eternal life on that partial, not yet complete knowledge of God.

482. When I was young, I had surgery that exacerbated my allergies, and made me weaker. I had one ovary removed. Every month I still have my period, but I lose five pounds of water weight, and must eat, drink, work out and get more rest to be okay.

483. In law school, my doctor wrote a note for me so I could eat while I took my exams. So, I wouldn't get dizzy or faint.

484. It has not been a problem for most of my life because prevention by eating more and drinking more water is pretty simple, but I may faint if I am dehydrated and hungry, during my period, which does not make me disabled. It makes me human in need of gallons as opposed to glasses of water, and additional care during a week of every month when I lose five pounds of water weight like clockwork each month.

485. All the doctors I saw when I was young had no problem sinning against God by prescribing medicine that made me worse, like throwing noodles at the wall to see if something would stick. God will throw people into hell for harming my body or harming

any body to serve their salaries. The Bible teaches God will destroy those who destroy God's temple, should they not repent. We are God's temple. 1 *Corinthians* 3:16-17.

486. My personal experience is why I studied healthcare history in a course at UD, and focused on healthcare finance and healthcare law in a couple of courses. Our healthcare kills more than it heals, harms, and I believe damns people to hell forever by masking pain inhibiting people's free will, ability to think clearly, preventing them from choosing to do God's will, damning them guaranteed should they die drugged up or in a medicated coma.

487. When I ran for office, I proposed changes to improve healthcare. See US Ex-Ex-43.

488. I ran as a democrat and democrats, disagreed with me by wanting more care, which meant more bad care since funding is more easily gained by using people as test dummies for new or different treatments, not necessarily better.

489. In 2018, two democrats in the healthcare field were selected to run, both I have high regards for. Yet, it is disturbing we are in a pandemic, I think by design. I believe our state Treasurer, a beautiful brilliant drug representative and our state Auditor a brilliant gifted speaker, a pharmacist were chosen, especially since our Treasurer's dad was the head of the Republican party in Sussex County, and Colleen Davies, our treasurer, ran as a democrat.

490. I discussed my disagreements related to healthcare in the US-Ex-, the law suit against the Democrats before the pandemic hit. Fancy out of state democrats became in state residents and became involved in helping President Biden and forming healthcare agendas within my district the 38<sup>th</sup> District and Sussex County, Delaware.

491. The World Economic Forum founder's books allude to very disturbing healthcare and military goals in his books which appear to be happening before our eyes to serve greed not good.

492. I have other objections to healthcare beyond what I write here. In the *Fourth Industrial Revolution*, written by the founder of the world economic forum's founder, other wicked schemes are proposed to harm life and human life under the guise of DNA improved healthcare. Schemes were shared in his book back in 2016. Since Bill Gates, a partner to the World Economic Forum is assisting in vaccines, I fear people are being exploited as lab rats for experiments that may harm them without protections in the form of the rule of law to require caring for patients, and correction if harm results. Instead, our laws allows and rewards hiding of wrongs, and rewards ignorance and not knowing, as knowledge is tied to culpability. So, it is sadly discouraged.

493. I oppose healthcare and mental healthcare examinations per the Defendants requests on religious grounds.

494. 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 for profit, I hope at least.

495. I am a child of God, priceless, not a price tag, to be sold for money. I am

not a human commodity to examine, to exploit for business greed by being a statistic or number.

496. 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. US Ex-Ex 43.

497. Drugging up the sick and elderly in hospitals is their damnation in hell guaranteed should they die, with their faculties inhibited. *Ecclesiastes 7:1, Matthew 24:13, Ezekiel 3:17-21*. I believe you must use your mind, your brain, to think, to care to know, to love to be saved from certain doom. *Deuteronomy 30:19, Sirach 15:11-20*.

498. I also receive food benefits, which I should have applied for before the pandemic. So, my costs for food are reduced. I had planned to go back to my old law firm, and did not ever think of myself as poor. I was foolish since welfare by government law unearned is required even in the bible, as I am required to care for my body since I am God's, not my own. *Exodus 23:11, Nehemiah 10:31* relating to cancel debts. In *Matthew 6:12*., Jesus means cancel monetary debts to prevent people from being tempted to the way of hell by making money their savior, in place of God, as God.

499. I am unemployed and not receiving unemployment compensation. There is no shame in applying for food benefits when one is eligible and in need. Maybe I need to be brought as low as possible to lift up others in need, to show the world those in need should not be ashamed despite people, (including some of my former high school schoolmates), misbehaving by shaming people receiving food stamps. I have behaved like a knucklehead for not applying for food stamps until after a global catastrophic emergency hit.

500. I have also attended the drive through food-pantries and shared the food with my neighbors. I cannot eat most of the food since I am a vegetarian with allergies.

501. I believe government funded policies that care for those in need without requiring indentured servitude such as volunteering, or work are biblical. Government policies lifting up those in need unconditionally, without enslaving them, by requiring they pay it back or pay it forward, reflect love, by respecting the dignity of human life, unearned, free. Under our Constitution, I believe this freedom is required, otherwise oppression is guaranteed in the form of exploiting desperate conditions, violating the Thirteenth amendment. U.S. Const. amend. XIII.

502. I believe government funded policies that care for those in need without requiring indentured servitude such as volunteering, or work are required by God in secular laws. Government policies lifting up those in need unconditionally, without enslaving them, by requiring they pay it back, by volunteer work requirements, or pay it forward, reflect love, by respecting the dignity of human life, unearned, free. Under our Constitution, I believe this freedom is required. Otherwise, oppression is guaranteed in the form of exploiting desperate conditions for entities and individuals to get as much as they can for as little as the can, violating the Thirteenth amendment, and violating God's laws by unjust gains. U.S. Const. amend. XIII. See. *Proverbs* 1:19, 15:27, 28:8, *Habakkuk* 2:9, 2:12, *Ezekiel* 22:12-13, 22:27, *Isaiah* 56:11, *Jeremiah* 6:13, *Psalms* 10:3, *Isaiah* 5:8 "Woe to you who add house to house and join field to field till no space is left and you live alone in the land."

503. Even in the Bible, there is welfare. See, *Exodus* 23:11. Every seven years

farms are required to lay fallow. So, those in need could pick up the crops to live off of in the years to come, without owing anything to the landowner.

504. While the Food bank still exploits the needy by forced volunteers, requiring volunteers, and requiring people to pay for a driver's license and transportation instead of directly helping people, not through entities, it is not those in need who sin. It is those who exploit them for profit and praise who sin, such as the farms and donors who gain tax breaks for donating, as well as marketing or the praise of men. (See, *Matthew* 6:1-4. I believe organized charity, fundraising, bake sales, car washes, selling girl scout cookies, pro bono, and forced work, forced volunteering leads to exploitation and many to lose eternal life in hell, by driving out love from the hearts of men replaced with business greed, the mark of the beast.)

505. I believe little school children are taught and tempted to go the way to hell young, should they not repent, by praise for their unpaid child labor to fundraise for schools or sports and corporate and other profit, conditioning them to sin against God later in life by giving donations to politicians and artificial entities without hearts such as churches, charities, not for profits and businesses, who have no power to do good.

506. I believe only individual humans can do good by reflecting the image of God by loving others unconditionally. *Genesis* 1:27, "God created mankind in his own image.," *Colossians* 3:10, Cf, the image of the beast, by absence of God, by absence of unconditional love, *Revelation* 13:15, "the image of the first beast.," See, 1 *John* 4:16, "God is love.," 1 *Corinthians* 13:4-8 "love... is not self-seeking..." I believe Jesus when he teaches people will be damned to hell for their unconcern, what they failed to sacrifice

materially to those in need, directly, without worldly reward or recognition, Godly reward for a worldly loss. *Matthew 41:46*.

507. In *Matthew 6:1-5*, Jesus teaches people will be damned to hell, have no reward for organized charity, fundraising or charitable events. Such deceptive false charities is business, not true charity, giving out one hand and to get something out of the other, such as tax breaks, recognition, marketing, good will, favors, money, material gain, praise connections or something else.

508. Organized charity is business, even the business of controlling the markets by philanthropy to private entities, politicians and donations to schools for required conformed studies to support planned manufactured markets, not based on freedom or the free will of individuals to innovate, instead the bought, tempting compelled willed by those with money, power, connections or influence to purchase a manufactured market.

509. Artificial entities without hearts, like churches, charities, businesses, not for profits, associations, organizations and other entities, run conditionally on money and conditional labor, not unconditional love, and those who work or organize under them exercise a conditioned will focused on the entities' conditionally interest, eliminating their free will to love unconditional by such conditional restraints.

510. I also believe people go to hell for failing to forgive monetary debts. *Deuteronomy 15:1* ("At the end of every seven years you must cancel debts."), *Deuteronomy 15:2* ("This is the manner of remission: Every creditor shall cancel what he has loaned to his neighbor. He is not to collect anything from his neighbor or brother, because the LORD's time of release has been proclaimed."), *Jeremiah 34:14*, *Matthew*

18:21-35, *Matthew* 6:12,14,15, *Proverbs* 21:13. I love people, and do not want people to go to hell by requiring I pay them unjust debt I cannot afford.

511. I am single, and my parents are recovering from covid in Florida. Everyone around me seems to be struggling with the increased cost of living, food, gas, paper, ink, postage or other commodities.

512. During the past two years, I suspended my drivers' insurance and rode my bicycle because I could not afford car insurance.

513. My parents have helped me with money given I listed as a gift, without interest, that I will pay back if and when I am able, on my Motion to file in forma pauperis.

514. My parents will forgive the debt as Jesus requires if I am not able to pay them back, in order that they and I not sin against God, per God's laws.

515. They may not be able to help me much longer, since the economy is pressuring them too.

516. My parents were infected with covid-19 in September 2021. My parents are now negative for covid-19, but are still recovering from covid19 lingering effects. They both received two vaccines and wear masks.

517. However, my father teaches school teach in Florida where students are not required to wear masks. So, the spread of covid-19 is not as contained by those who choose not to wear masks in the schools.

518. They both are old and tired. I hope the lingering symptoms related to blood cuts and clots that block blood from carrying oxygen to vital organs, causing organ shut down and covid toes do not harm them. Viruses may stay dormant in the body. Covid19, like the flu is quickly morphing, meaning vaccines and pills will have little results in



preventing the spread due the quick mutations of these type of viruses. Masks on the other hand, reduce the spread. I am scared they may die soon, though they now test negative.

519. I am asking the Court in a Motion, filed contemporaneously with the initial Complaint, and will ask the defendants if they would be willing to receive communications via email, and participate in court electronically, stipulating to a waiver of paper pleadings and postage, due to reducing the risks of spreading covid-19, and also due to the obstacle driving to upper Delaware to the US District Court for the District of Delaware's court house would cause me as costs increase for food, gas, ink, paper, and other things. I may suspend my car insurance again, due to inability to pay.

520. I am also filed contemporaneously with the initial complaint, a motion to participate in appearances and proceedings remotely to reduce the increased risks of contagion during this plague and to reduce costs for all parties during this planned, preventable hyper-inflation the globe is experiencing relating to gas, postage, paper, ink and other items.

521. I have severe allergies that mimic covid, causing diarrhea and other unpleasant symptoms, sometimes severe anaphylactic shock, closing of my throat, wheezing, dizziness which cannot avoid, as allergy medicines worsen not alleviate my symptoms. I live alone, and must perform yard work as I have no money to pay for others to help me, and neighbors complain instead of assist.

522. Though, I test myself probably too often and am negative for Covid-19, I would prefer to reduce the chances of sickness and death if allowed by this Honorable Court and permitted by the Defendants.

523. When I first drafted my law suit in the Chancery Court related to *Kelly v*

*Trump*, I did not have a working computer or a printer. My parents kindly bought me a computer down the line, but it broke twice. My printer broke three times before it completely broke. I recently bought a new one, with no idea how I will afford ink. I do not even have a working phone at this time. I have a fire in my belly to stand up for something more important than a job or money, I am standing up for God, and my life, my reputation, and my livelihood. Just laws and justice glorify God. Seeking justice in courts is a command based on love for one another, and mercy, not money. I gave my life to God, not to monetary gain, not to the false God of money.

524. I choose to fight for my faith, to exercise my belief in Jesus Christ without government suppression of my speech, substantial burdens on my associations and substantial burdens on my free exercise of living my faith, by doing the will of God, even if I do not know how I will get by each day. I choose to have faith.

525. I was denied access to Del Tech's scanner to scan in the voluminous amount of exhibits. I apologize I was unable to create a CD for the Court and Defendants with reduced number of scans as an exhibit to this Complaint.

**COUNT I-DEFENDANTS RETALIATION AGAINST ME FOR THE EXERCISE  
OF MY FIRST AMENDMENT RIGHT TO PETITION FOR GRIEVANCES BASED  
ON MY EXERCISE OF CIVIL RIGHTS IN VIOLATION OF THE FIRST  
AMENDMENT APPLICABLE TO THE DEFENDANTS PURUSANT TO THE  
FOURTEENTH AMENDMENT**

526. Meghan Kelly incorporates by reference all of the preceding and subsequent paragraphs as if fully recited herein.

527. Defendants acted in retaliation against me, by initiating proceedings to place my license to practice law on inactive disabled, but for the exercise of my First Amendment right to free speech, to freely exercise my religious belief, association and the right to petition the government for redress of grievances and (2) in direct violation of the First Amendment right to petition the government.

528. The adverse action was `sufficient to deter a person of ordinary firmness from exercising his First Amendment rights.'" *Jacobs v. Beard*, 172 Fed. Appx. 452, 455 (3d Cir. 2006) (citing *Allah v. Seiverling*, 229 F.3d 220, 224-25 (3d Cir. 2000)).

529. Defendants continue to retaliate against me based on my First Amendment exercise of the right to petition, speech, associate and exercise my religious beliefs. I face irreparable injury to my free exercise of speech, association, religion, right to petition, reputation, pecuniary harm, and a substantial burden to work as an attorney, or anywhere else, should this Honorable Court not enjoin the Defendants.

530. My protected activity, exercise of my First Amendment Right to petition the court for grievances, speech, association and exercise of religion, "was a substantial factor in the alleged retaliatory action." *Blevis v. Lyndhurst Bd. of Educ.*, 2009 WL 3128402 at \*5 (D.N.J. Sept. 28, 2009) (citing *Hill v. Borough of Kutztown*, 455 F.3d 225, 241 (3d Cir. 2006). The "first prong is a legal query, and the second prong is a determination of fact. " *Hill*, 455 F.3d at 241.

531. Defendants face no threat of irreparable injury by an injunction.

532. Defendants' retaliation against me for the exercise of my First Amendment Right to petition for grievances based on civil rights in violation of the First Amendment applicable to the Fourteenth Amendment would cause irreparable injury to

others. I seek to use my voice to prevent the elimination of social security, to prevent the elimination of private ownership or real property per the world economic forum founder's plan, prevent the elimination of the 47 percent of the jobs in the US, including lawyers, and to prevent an economic crash by recommending changes to the banking system, proposing similar Executive orders that Presidents Lincoln and Kennedy passed that would divert the planned elimination of the dollar and economic crash, and to prevent other harms. My reputation would be tarnished, diminishing my speech from being considered, should Defendants be permitted to punish me, to retaliate against me for the exercise of my Civil rights. Other people would suffer.

533. I stood up for children at the border, the NFL players freedom to speak, associate and protest, and the freedom of the press. I intend to continue to use my voice, to help the oppressed, particularly the baby boomers and elderly.

534. In addition, the public would be harmed by the precedent a denial of this motion would create which would allow Government agents to initiate or continue proceedings to deem those who disagree with the government or think or believe or associate differently than a government organization's agent's compelled will, to be labeled mentally disabled or disabled, but for their diverse beliefs, and speech reflecting such diverse beliefs, chilling the public's exercise of their free will and constitutionally protected speech, belief, association, and petitions for grievances against Government conduct.

535. Defendants have no important or necessary interest in taking away my active license to practice law in response to my exercise of Constitutionally protected

rights, narrowly tailored to such interest which outweighs the interest in the exercise of my First Amendment rights.

536. I am not representing any person, nor am I planning on representing anyone in the near future. I have not worked as an attorney advocate in years. I pose no risk to nonexistent clients or the public. I seek to safeguard the public and humanity from those who would harm them to serve business greed. I hope to get a position back with my old law firm performing real estate settlements, as the pandemic subsides which will not likely be anytime soon.

537. I discovered, I hate trial work, but I love God. So, I chose to stand up for my religious belief in Jesus Christ by filing *Kelly v Trump*, even if I am the only one. I should not be punished by government agents for my strongly held, individual religious beliefs, even if those beliefs are repugnant and conflicting to those strongly held beliefs of government agents, even the courts.

**COUNT II-DEFENDANTS OBSTRUCTION OF JUSTICE AND RETALIATION  
AGAINST ME FOR THE EXERCISE OF MY FIRST AMENDMENT RIGHT TO  
PETITION FOR GRIEVANCES BASED ON SEEKING RELIEF FROM  
ATTORNEY LICENSE DUES OR BASED ON KELLY V TRUMP, TO IMPEDE,  
OBSTRUCT, HARASS OR PRESSURE ME TO FORGO MY LAW SUIT,  
KELLY V TRUMP OR TO GATHER EVIDENCE AGAINST ME TO PUNISH  
ME FOR EXERCISING MY PROTECTED RIGHT TO PETITION FOR  
GRIEVANCES IN VIOLATION OF THE FIRST AMENDMENT APPLICABLE  
TO THE DEFENDANTS PURSUANT TO THE FOURTEENTH AMENDMENT  
AND IN VIOLATION OF 42 U.S.C. § 1985 (2)(b) or 42 U.S.C. § 1983.**

538. Meghan Kelly incorporates by reference all of the preceding and subsequent paragraphs as if fully recited herein.

539. I participated in Constitutionally protected conduct by petitioning the Court to exempt attorney license fees for attorneys facing hardship and unemployment due to the pandemic, and by petitioning the Court for relief in *Kelly v Trump*.

540. Defendants conspired with De-Lapp, an arm of the Delaware Supreme Court by taking adverse action against me, a threatening letter requiring I respond within ten days, allegedly based on that conduct of petitioning the Court for grievances for either my request or bringing the law suit *Kelly v Trump* with intent to punish, retaliate, harass, interfere, or pressure me to forgo my lawsuit in *Kelly v Trump*, in conspiracy with Defendants, and Judge Clark, in violation of 42 U.S.C. § 1985 (2)(b) and/or to gather information to be used by Defendants to retaliate against me by bringing an ODC complaint against me, but for the exercise of my protected conduct, petitioning the Court for relief related to attorney dues, or petition the courts for relief in *Kelly v Trump*, in violation of the First Amendment applicable to the Defendants pursuant to the Fourteenth Amendment.

541. Defendants conspired by seeking to initiate additional investigations and examinations against me as evidenced by the August 23, 2021, and September 27, 2021 letters to punish, retaliate, impede, interfere or cause me to forgo an ongoing case in *Kelly v Trump* in violation of my First amendment rights applicable to the Defendants pursuant to the Fourteenth Amendment, and pursuant to 42 U.S.C. § 1985 (2)(b) and 42 U.S.C. § 1983.

**COUNT III. DEFENDANTS OBSTRUCTION OF JUSTICE AND  
RETALIATION AGAINST ME FOR MY SPEECH, ASSOCIATION AND  
EXERCISE OF RELIGIOUS BELIEFS IN VIOLATION OF THE FIRST  
AMENDMENT APPLICABLE TO THE DEFENDANTS PURUSANT TO THE  
FOURTEENTH AMENDMENT**

542. Meghan Kelly incorporates by reference all of the preceding and subsequent paragraphs as if fully recited herein.

543. Defendants retaliated against me by seeking to punish me by taking away my paid for active license to practice law, to harm my reputation, to hide government mistakes and misbehavior I sought to address or to punish me based on my religious beliefs, constitutionally protected speech, association, or poverty in violation of the First Amendment applicable to the Defendants pursuant to the Fourteenth Amendment.

**COUNT IV-INTENTIONAL OR RECKLESS INFLICTION OF EMOTIONAL  
DISTRESS CAUSED BUT FOR DEFENDANTS INTEREFERENCE AND  
RETALIATION AGAINST ME FOR MY EXERCISE OF MY CIVIL  
LIBERTIES**

544. Meghan Kelly incorporates by reference all of the preceding and subsequent paragraphs as if fully recited herein.

545. I“(1) (have) in fact suffered emotional distress, embarrassment and/or humiliation, and (2) defendant’s actions, proximately caused my injuries.” *Aumiller v. University of Delaware*, 434 F. Supp. 1273, 1977 U.S. Dist. LEXIS 15317 (D. Del.).

546. Defendants knew or should have known their callous, hard hearted violations of federal and Constitutional laws protecting my free exercise of fundamental

rights, but for my assertion of those rights would cause, and did cause emotional distress manifesting in physical symptoms.

547. I will continue to suffer emotional distress, and likely financial distress should Defendants not be enjoined from instigating proceedings to retaliate against me for the exercise of my first Amendment rights in violation of those rights applicable to the Defendants pursuant to the Fourteenth Amendment.

**COUNT V. OBSTRUCTION OF JUSTICE BASED ON PROTECTED  
SPEECH, RELIGION, ASSOCIATION OR PETITIONING THE COURT**

548. Meghan Kelly incorporates by reference all of the preceding paragraphs and subsequent paragraphs, as if fully recited herein.

549. Defendants intimidated me, a party in the *Kelly v Trump* law suit, conspiring with two or more people to threaten, influence, hinder, impede, obstruct, defeat me from bringing *Kelly v Trump*, denying me, a citizen, equal protections of the laws, based on poverty, religious beliefs, free exercise of speech or association, injuring me economically, seeking to take away my livelihood, while seeking to suppress my exercise of religion, speech, and right to seek grievances in court in violation of 42 USCS § 1985 (b), by threatening me with Defendants' letters dated August 23, 2021 and September 27, 2021.

550. The Defendants, interfered with, impeded, obstructed my access to the courts or threatened to take away my license to practice law, but for my law suit to protect my free exercise of religion, association and speech under Equal protections of the law, as a class of one, in an attempt to impede an active law suit that is before the United States Supreme court as of this date, based on my exercise of a right as a party, not acting as an attorney, safeguarding protected religious associated beliefs and speech in violation of the



First Amendment applicable to the Defendants pursuant to the Fourteenth Amendment.

**COUNT VI-INJURY TO REPUTATION CAUSING ME TO LOSE  
SIGNIFIGANT EMPLOYMENT OR ASSOCIATED OPPORTUNITIES, AND  
SPEECH**

551. Meghan Kelly incorporates by reference all of the preceding paragraphs and subsequent paragraphs, as if fully recited herein.

552. Injury to reputation itself is not a deprivation of liberty or property. *Paul v Davis* 424 US 693 (1976). However, Governments acts so injure my reputation that I will lose significant employment or associational opportunities, including my ability to practice law in the state of Delaware as a result of Defendants malicious punishment based on their disagreement of my protected Constitutional beliefs, speech, association and/or petition(s).

**COUNT VII-PROCEDURAL DUE PROCESS VIOLATIONS**

553. Meghan Kelly incorporates by reference all of the preceding paragraphs and subsequent paragraphs, as if fully recited herein.

554. Defendants deprive me of substantive due process rights in the state proceeding brought by the ODC by disparate treatment, but for my religious beliefs, speech, poverty, association, religious exercise, and exercise of right to petition the Court, including the right to petition to defend my exercise of fundamental rights.

555. I was denied the right to notice, right to a fair and impartial proceeding.

556. I was denied sufficient notice of the hearing.

557. I was denied access to the courts by the Defendants collusion, denied an opportunity to prepare and present by the denial of discovery.

558. I was denied the opportunity to subpoena and cross examine necessary witnesses to present defenses for the exercise of my fundamental rights.

559. I was denied appealable orders, preventing an opportunity to be heard on motions I made before the Board by preventing my ability to appeal decisions.

560. The Board ignored some of my petitions, deeming me unworthy to be heard, making their decision by the dictates of their lusts, not the impartial rule of law.

561. Defendants deny me procedural Due process by interfering, harassing, and seeking to obstruct my access to the courts in *Kelly v Trump* by government pressure to forgo or otherwise interfere with my case.

**COUNT VIII SUBSTANTIVE DUE PROCESS VIOLATIONS AND EQUAL  
PROTECTION VIOLATIONS**

562. Meghan Kelly incorporates by reference all of the preceding paragraphs and subsequent paragraphs, as if fully recited herein.

563. Defendants deprive me of substantive due process rights for notice, an opportunity to heard and a fair and impartial trial, in the state proceedings, relating to *Kelly v Trump*, and in the petition by the Defendants, by disparate treatment, but for my religious beliefs, exercise of fundamental rights or poverty in violation of the substantive Due Process Clause, and the Equal Protections Clause applicable to the Defendants pursuant to the Fourteenth Amendment, as applied to me, a party of one.

564. I have suffered loss, a substantial burden and interference with fundamental rights, but for the Defendants disparate treatment, motivated by their disdain for my exercise of fundamental rights.

565. Defendants deprived me of adequate notice, deprived me of an opportunity to be heard by not rendering orders I may appeal on certain motions, deprived me of a fair opportunity to be heard, denied me of an opportunity to prepare and present a defense, deprived me the opportunity to subpoena witnesses, cross examine witnesses, perform discovery, opportunity to research, deprived me of a fair opportunity to present a case, forcing me to rush through to attend a proceeding without sleep and ability to function well due to allergies, and lack of opportunity to prepare, but for disdain for my religious beliefs, manifested in my speech and petitions.

#### **PRAYER FOR RELIEF**

WHEREFORE, Meghan Kelly respectfully requests that this Honorable Court:

1. Enter an Order to permanently enjoining and restraining Defendants from punishing Meghan Kelly for exercise of her first amendment right of speech, religion and association, and access to the courts as an aggrieved party.
2. Enter an Order to declare the proceeding brought by the Defendants against me to be illegal as applied.
3. Enter any Order declaring the Defendants' determinations in the state forum null and void, based on the proceeding being found illegally brought, as applied to Plaintiff.

# Exhibit C

UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF PENNSYLVANIA

IN THE MATTER OF A MEMBER §
OF THE BAR § Misc. No. 22-45
§
§
MEGHAN M. KELLY, §
Respondent. §

Respondent Meghan Kelly’s Motion for good cause, to waive record, transcript fees, filing fees and other court costs by the Clerk and this Court

Respondent Meghan Kelly’s Motion for good cause, to waive record, transcript fees filing fees and other court costs by the Clerk and this Court.

1. This original disciplinary proceeding was brought by the Delaware Disciplinary Counsel, and Delaware Supreme Court members per their admission based on my religious-political beliefs, and religious-political speech contained in my religious-political petitions in my Religious Freedom Restoration Act (“RFRA”) Law suit Kelly v Trump. I am incorporating by reference in its entirety what I filed with the US Supreme Court Matter No 21-5522, in attachments to this Motion (Referred to as “Pet”). I will refer to the exhibits and appendix therein by reference in this Motion, and future motions.

I. Other reasons, cover up court misconduct, poverty animus, place of origin animus, and political-religious animus

2. I believe the Court brought the case not only for Kelly v Trump, but also for my other religious-political petitions, and to cover up state misconduct to market the illusion of justice while committing great injustice by violating my individual liberties under the Constitution.

3. Prior to admission into the Delaware Bar, I made a request to affirm, which I wrongly believed was less wicked than swearing in. Also see Respondent's Meghan Kelly's Motion to be excused from the notary and affirming requirements in Delaware Court pleadings, Exhibits A through D thereto, filed with the Delaware Supreme Court on June 7, 2022, attached hereto and incorporated herein by reference. The Court ignored my request. I was sworn into the Delaware Bar in violation of my religious belief. Pet-Exhibit 3 to Appendix F.

4. My other religious petitions to the Delaware government were ignored over the years, including my petition against participating in family law, and removing my name from the rotating list of attorneys for family law appointments. Pet-Exhibit 4 to Appendix F, Pet-Exhibit 5 to Appendix F, Pet-Exhibit 6 to Appendix F.

5. I made petitions to run for office without fundraising, gathering signatures or paying filing fees, which violate my religious beliefs. I believe people sin leading to damnation in hell, without repentance by fundraising,

volunteering, and participating in organized charity which is not true charity per Jesus Christ's teachings in *Matthew* 6:1-4. Please see my letter to the US Supreme Court, my law suit against the Department of Elections and Democrats, and other documents in the Petition I incorporate herein by reference at Pet-Exhibit 50 to Appendix F, Pet-Exhibit 50 to Appendix F, and Pet- Exhibit 2 to Appendix F to confirm I indeed argued fundraising, and collecting signatures violates my religious beliefs.

6. I would be more limited in my religious exercise should I be wearing the cloak of government authority. However, I am a private citizen, not employed by the government. The Constitution protects my freedom to speak and exercise my genuine religious beliefs and my other Constitutional rights without government persecution merely because they find my beliefs in Jesus repugnant or inconvenient.

7. Members of the judiciary have also selectively targeted me for their perceived belief I am a Pennsylvanian. I was born in PA, but I was raised in Delaware. It should not matter where I was born to government agents, including judges.

8. During my first appearance ever, Court of Common Pleas Judge Smalls called me a "Philadelphia lawyer" because I filled in for another attorney.

The other attorney at the table also filled in for another lawyer. He was not scolded.

9. Justice Slights also told me to “Go back to Pennsylvania” after a CLE where I answered a question correctly, and stole his thunder.

10. I have also been selectively targeted by the state in retaliation for my right to petition for other matters. It is complicated. I am from lower Delaware. I didn’t know the judges from upper Delaware who misbehaved by seeking to demean me by saying I was from Pennsylvania, which is not demeaning. I assumed these two judges knew I was born in Pennsylvania because they gossip with their arms and gain confidential information wrongly from their arms.

11. It is complicated history. I actually lost more than 2 million dollars in potential income I would have earned if I had remained at RLF over the years. RLF, the biggest home-grown corporate law firm was the first law firm I ever worked as a licensed attorney. My contract was not renewed, but for the state retaliation for my exercise of the right to petition regarding my destroyed bar materials. I got in trouble for petitioning the Delaware court or its arms for help previously, as I was taking the bar. I complained to either the Delaware Supreme Court or the Board of Bar examiners my ceiling at Widener caved in with water flooding into my rented dorm room, destroying my bar materials. Widener would



not replace my books. They did after I complained. The Delaware Supreme Court's partners agents of Widener or the Board of Bar Examiners wanted to make me look bad because I made a petition for help. They made a complaint against me that cost me my job, and a delayed my admission. It also caused additional harm. The Court appears to gossip with its partner. How else would these two strangers from upper Delaware know so much about me or even care enough to selectively target me. They appear to be loyal to one another, which is sin. The Courts should impartially treat all with fairness and equal protections under the law to believe differently, associate differently and exercise beliefs within the limits of the law, not the compelled peer pressured lusts which are the desires of the judges, government partners or those in authority who seek to control instead of serve. Please see the letter dated December 11, 2020 to Master Griffin relating to getting into trouble for petitioning for help. Also see the Amended Complaint I filed in the civil rights case, which I moved to amend since.

12. I oppose lawyer and judicial self-regulation and third-party regulation of professionals including lawyers and judges. I believe a case and controversy is necessary to correct lawyer or judicial misconduct in Court. Should a judge have a problem with a lawyer in court he or she should address it during the proceeding to allow appeal, not in a secret proceeding by those who serve business greed not good. I oppose all the proposals for federal judges to be regulated by self-

regulation or by third parties because the regulations serving their seats will control their decisions, not the Supreme law that makes us free, the constitution. My Delaware Disciplinary case or other appeal may give the United States Supreme court a say on whether and how both lawyers and federal judges may be regulated. Please see my motions relating to my opposition of regulation incorporated herein by reference by attachments. I believe impeachment is the other alternative with regards to correcting judges, not secret professional board or other proceedings. I also oppose elimination of life long appointments because it will tempt judge to favor the will of those who have power over their seats compromising their ability to judge impartiality under the Constitution. I obviously am trying to muster time to appeal this issue. Your denial of a stay prevents me from protecting the integrity of the Delaware courts from behaving like the wild wild west, throwing the law out as has been done towards me and letting their will be done above the law. I desire to write Justice Alito about ruling self-regulation of lawyers and judges unconstitutional on appeal from the Third Circuit disciplinary case. I have too much to appeal in the DE case. I need to act quickly. I have no time and am getting stone walled in disciplinary proceedings and by this Court. There is an attack on the Court. I have read and listened to inferences from the WEF and the a speaker at the World Government Summit which lead me to believe there is a plan to eliminate people judges, replaced by automation in the decades to come. I

believe the Court is in trouble, meaning we will be in trouble too. I want to protect you by asking Justice Alito for help. I am sorry if I run out of time because courts are not granting me meaningful opportunity for access in other courts, as well as their own.

13. The Delaware Supreme Court's members made a complaint to incite the disciplinary proceeding against me. The information contained in its arms' threatening letter was only known by the Delaware Supreme Court's members and Mark Vavala of the Delaware Bar Association, opposing Delaware Disciplinary counsel Kathleen Vavala's Uncle.

14. The day the preliminary committee met it appears the Delaware Supreme Court sealed four docket items in *Kelly v Trump* necessary for my defense to prejudice the preliminary proceeding, the disciplinary proceeding and my civil rights case against me.

15. The Delaware Office of Disciplinary Counsel selectively targeted me and brought the petition maliciously, with religious-political animus, poverty animus, and the impermissible self-serving interests to cover up state misconduct.

## II Background *Kelly v Trump*

16. I filed a RFRA law suit against former President Donald J. Trump, Supreme Court No. 21-5522, to alleviate a substantial burden upon my access to the courts.

17. The Delaware Supreme Court should have kicked out my case, Kelly v Trump, because I did not serve US Attorney General David Weiss. Instead, the Court held my argument against government established religion was without merit. Kelly v. Trump, 256 A.3d 207 (Del.), reargument denied (July 19, 2021), cert. denied, 142 S. Ct. 441, 211 L. Ed. 2d 260 (November 1, 2021)

### III. State interference President Trump Lawsuit

18. During Kelly v Trump, the Court's agents interfered with, impeded and acted in a manner as to cause me to for my law suit. The staff at the Chancery Court appeared to sabotage my case, misleading me to almost miss my deadline to appeal, wrote on my praecipe creating confusion and preventing me from serving local US Attorney General David Weiss. Court of Common Pleas Judge Kenneth S. Clark verbally attacked me at a Sussex County grocery store, interrogating me at BJ's, at the ODC's request to interfere with or cause me to forgo my lawsuit against the President of the United States. During the law suit, I received the attached three letters from the arms of the Court to interfere with the law suit by threats of investigation or discipline. The letter indicated a review of my religious-political

petitions in both the Delaware Supreme Court and the Chancery Court was the reason for the discipline.

19. During the law suit, I filed religious-political petitions for a waiver of bar dues due to economic hardship. I paid the dues, but material in the letter proved the Delaware Supreme Court or its members to be the source of the armed attacks, by Judge Clark, DE-Lapp, and the ODC in interference with my active law suit against former President Trump.

20. I filed the Motions to petition the Court to reign in the Supreme Court's armed attacks, and for the recusal of Judge Seitz. I later discovered by confirmation of the clerk of Court that all judges consider attorney due petitions. So, it appears the entire Court participated in the armed attacks against me in interference with my active law suit.

21. On or about October 25, 2021, I filed a law suit with the Delaware District Court for damages and equitable relief, under 42 Sections 1983, 85 and 88, to inter alias enjoin the ODC from punishing me for the exercise of my religious-political petitions, religious-political beliefs, religious-political association, religious-political exercise, and religious-political petitions. I also requested damages and additional relief in the initial complaint and have moved to amend the

complaint to inter alias vacate Kelly v Trump and include the members of the Delaware Supreme Court and the Court as Defendants.

22. In November 2021, Delaware's Disciplinary counsel instigated disciplinary proceedings against me.

23. On or about the day the preliminary committee met, the Delaware Supreme Court pulled four docket items in Kelly v Trump necessary for my defense to prejudice the preliminary proceeding, the disciplinary proceeding and my civil rights case against me.

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

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

the Chancery Court to prevent their favorable testimony in my defense, and government concealing of petitions favorable to my defense, violates my Due Process rights to a fair proceeding, by bias towards the State.

26. There are many other factors showing a denial of my opportunity to be heard and meaningful access to the Courts, but I will reserve that for later in a for cause motion, if required. A case for or against me on appeal to the US Supreme Court may eliminate the need to file additional documents.

27. The Delaware Supreme Court ignored my legal arguments, and found me disabled. The Court placed my license to practice law on disabled/inactive.

28. I must appeal the Delaware Supreme Court's decision to the United States Supreme Honorable Court.

#### IV. Arguments to grant an exemption for costs

29. I am a Christian. It is against my religious belief to become indebted to pay others back at a future time, for things I cannot afford now. Debt violates my religious belief by tempting me to be guided by money, business greed, as guide and God, in place of my trust in God as guide in God in my life. Jesus Christ teaches you cannot make both God and money your master. I choose God. Money should be the servant government creates to care for people, not to control or enslave people to bend their substantially burdened will to the dictates by those

who tempt them by threat of financial penalty or reward. The way money is created eliminates liberty, under the lie of being liberty.

30. When I rented an apartment, I prepaid the debt so as not to violate my religious belief when I worked at Richards, Layton and Finger in upper Delaware.

31. My religious beliefs against indebtedness are genuine. I have never actually used a real credit card in my name. I applied for ones they gave away to college kids I never used for free stuff because I was dumb. In addition, I have used a banking debit card.

32. The debt I owe my parents is not like any other which violates my religious beliefs. It is forgiven if I cannot afford to pay it back in the years to come. Yet, I hope to return to my former law firm. So, I can ease the burden off my parents' back by free choice, not compelled or required mandate.

33. I am filing documents in 6 other jurisdictions regarding law suits against me based on reciprocity. This has increased an economic burden upon my access to the Courts as I defend my belief in Jesus and exercise of other First Amendment rights from government persecution and government incited persecution, but for my exercise of Constitutional liberties.

34. I cannot afford to pay for fees and costs.



35. The Delaware disciplinary order prevents me from seeking to rejoin my former law firm and from becoming employed as a lawyer in Delaware.

36. I am unemployed. Per the attached exhibit A, I am eligible for government food benefits because of my poverty.

37. I am impoverished and cannot pay for fees, Court and clerk costs or transcript fees.

38. The costs of any payment required creates a substantial burden upon my access to the courts, to defend the exercise of my First Amendment rights, including my exercise of First Amendment religious-political-speech, religious-political-association, religious-political belief, religious-exercise, and my exercise of the right to petition the Courts to defend or safeguard my First Amendment rights from government retaliation, interference, and elimination.

39. Additionally, the costs, any cost, exceed the amount I will be able to pay should the US Supreme Court, or other Court require a record of this case.

40. The costs of such payment would also require I violate my religious belief against debt, as I seek to defend my exercise of fundamental rights based on government poverty-animus and religious-political-animus.

41. I seek an exemption from being required to pay any and all costs and potential costs by the Clerk and this Court in this matter.

42. In “all stages of the proceedings the Due Process and Equal Protection Clause protects [indigent persons] from invidious discriminations.” *Lewis v. Casey*, 518 U.S. 343, 370 (1996).

43. “There can be no equal justice where the kind of trial a man gets depends on the amount of money he has.” *Id.*

44. Because this case implicates my Constitutionally protected first Amendment rights, denial of my right to access to the courts based on failure to exempt costs due to my poverty and religious objection to indebtedness, is still unconstitutional under a strict scrutiny basis test. Citing, *Tennessee v. Lane*, 541 U.S. 509, 533 n.20 (2004).

45. In order for this Court to require I accrue costs, which violate my religious beliefs, compromising my faith in Jesus to servitude to Satan by making money God, and guide, by withholding an exemption to fees and costs relating to this proceeding and any appeals thereto, the Court must have a compelling interest somehow more important than my free exercise of religion, narrowly tailored to support such interest.

46. Money is not a compelling interest somehow more important or valuable than the First Amendment liberties, including my fundamental rights.

47. If money and costs are more important than freedom, then the courts enslave the people and do not protect Constitutional liberties.

48. The Court may not require forced indebtedness, through costs, in violation of my religious beliefs because its justification to compel forced violations of my religion is not narrowly tailored in this case. Since, the Court may grant an exemption to prevent the government forced violation of my religious beliefs, from costs.

49. As applied, this Court may not apply costs to compel me into involuntary servitude in violation of the 13<sup>th</sup> Amendment in my case too. I certainly do not willfully choose to violate my religious beliefs against indebtedness.

Wherefore, I pray this Court grants this Motion.

October 16, 2022

Respectfully submitted,

/s/Meghan Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
(302) 493-6693  
Retired Bar No. 202268, INACTIVE, not  
practicing law on behalf of another

# Exhibit D

**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 E

MEGHAN KELLY, ESQUIRE

---

34012 Shawnee Drive  
Dagsboro, DE 19939

December 10, 2009

The Honorable Peter B. Jones  
The Family Court  
22 The Circle  
Georgetown, DE 19947

Dear Honorable Peter B. Jones,

Thank you for taking time to meet with me 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, Mathew 19. 6; *also see*, NIV, Malachi 2:16 (“I hate divorce”), NIV Genesis 2:20 (“man will . . . be united to his wife, and they become one flesh”); and, 1 Corinthians 7:10-11, (“ A wife must not separate from her husband ” “And a husband must not divorce his wife.”)

In November, to my horror, I was appointed to a guardianship proceeding. I believe that 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.

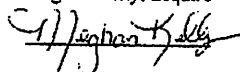


Since, I didn't want to contribute to the destruction of a union created by God, I attempted to find another attorney who could replace my appointment with no success. As a result, I contacted this Honorable Court and communicated my views and this Honorable Court kindly relieved me of the appointment.

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". The signature is written in black ink and is positioned below the typed name.

# Exhibit F

**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**

U.S. COURT OF APPEALS, THIRD CIRCUIT

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

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

Dated October 22, 2022

Respectfully submitted,

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

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**IN THE THIRD CIRCUIT COURT OF APPEALS, APPEAL OF THE ORDERS  
BELOW OF THE DELAWARE DISTRICT COURT**

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

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

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

### **JURISDICTION**

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

### **STANDARD OF REVIEW**

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

### **STATEMENT OF CASE**

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

State procedural law barred presentation of my Constitutional claims.

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

A judgment may be void if a court "acted in a manner inconsistent with due process of law." *Constr. Drilling, Inc. v. Chusid*, 131 F. App'x 366, 372 (3d Cir. 2005); citing, 1 *Charles Alan Wright, Arthur R. Miller & Mary Kay Kane, Federal Practice and Procedure* § 2862.<sup>5</sup> "While 60(b)(4) motions are ordinarily raised in the court that rendered the decision, they can be raised elsewhere." *Id.* Accordingly, I must be permitted the opportunity to plead to void *Kelly v Trump* based on absence of subject matter jurisdiction or voidable subject matter jurisdiction for the court's incitement and participation in prosecuting me for my religious beliefs and speech, contained in my petitions. In addition, I should not be denied the opportunity to request relief for the state's interference and attacks against me during my live religious-political RFRA case, *Kelly v Trump*, to cause me to forgo constitutional rights and to affect the outcome. *See, Kennedy v. Bremerton Sch. Dist.*, 142 S. Ct. 2407 (2022) ("The Free Exercise and Free Speech Clauses of the First Amendment work in tandem: where the Free Exercise Clause protects religious exercises, whether communicative or not, the Free Speech Clause provides overlapping protection for expressive religious activities.")

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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<sup>8</sup> *Obergefell v. Hodges*, 576 U.S. 644

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

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

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

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

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<sup>9</sup> *Employment Div., Dept. of Human Resources of Ore. v. Smith*, 494 U. S. 872, 887, 110 S. Ct. 1595, 108 L. Ed. 2d 876 (1990). ("the First Amendment forbids civil courts from" interpreting "particular church doctrines" and determining "the importance of those doctrines to the religion.")

<sup>10</sup> Objxn-K-Internal-Ex-5-7.

<sup>11</sup> Objxn-H

<sup>12</sup> Objn-K-Ex-1.

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

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

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

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

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

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

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

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

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

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<sup>14</sup> . Objxn-Ex B-H2, K

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

<sup>16</sup> Objxn-K- 8-9, FF, GG, D.I. 55-56.

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Kathleen's bad faith, or at best ignorant, attacks display her cold heartless indifference towards the substantial burden poverty has placed upon my defense of exercise of fundamental rights in this case.<sup>20</sup> "[A]t all stages of the proceedings the Due Process and Equal Protection Clauses protect [indigent persons] from invidious discriminations" *Lewis v. Casey*, 518 U.S. 343, 370 (1996) "Because this case implicates the [Constitutionally protected] right of access to the courts," and other fundamental rights, the government's disparate treatment towards me, based on poverty, is still unconstitutional under a strict scrutiny basis test. Citing, *Tennessee v. Lane*, 541 U.S. 509, 533 n.20 (2004).<sup>21</sup>

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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<sup>23</sup> DI 62-72

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

<sup>25</sup> Objxn-Ex-T-U-U-2-V.



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

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

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

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

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

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<sup>26</sup> Objxn-MOL

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

## VII. CONCLUSION

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

Dated: October 22, 2022

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

# Exhibit G

**MEGHAN MARIE KELLY, ESQUIRE**

**34012 Shawnee Drive  
Dagsboro, DE 19939**

**December 11, 2020**

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

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

**Thank you/New Supreme Court Order**

**Dear Honorable Master Patricia Griffin:**

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

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

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

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

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

**REGISTERED CHANCERY  
GEORGETOWN DELAWARE  
2020 DEC 11 P 12:52**

Case: 21-3198 Document: 98-5 Page: 2 Date Filed: 10/22/2022

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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


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

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

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

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

Thank you,

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

CC. Attorney General William Barr, Esq.



# **EXHIBIT**

## **A**



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# Post Your Problems

Helping you with consumer questions. Cutting through red tape.

## Lawrence Walsh: Rat is unwelcome study partner



Wednesday, June 29, 2005

By Lawrence Walsh, Post-Gazette Staff Writer

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

I'll keep you posted.

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

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

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# Exhibit H

U.S. COURT OF APPEALS, THIRD CIRCUIT

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

**Respondent Meghan Kelly’s corrected Motion, for good cause, for additional time to draft the Brief in light of Order, dated October 18, 2022, at DI 94**

I, Appellant Plaintiff Meghan Kelly, for good cause, pursuant to Federal Rules of Appellate Procedure Rule 26 (b), move the Court for additional time to file a Brief, in the amount of 30 days or an amount of time it deems just.

1. FRAP R. 26(b) provides: “For good cause, the court may extend the time prescribed by these rules or by its order to perform any act, or may permit an act to be done after that time expires.

2. On October 7, 2022, I sent the Delaware District Court *Plaintiff Meghan Kelly’s Motion pursuant to FRCP R. 60(b)(1)(2)(3)(4)(6) to alter and amend the orders, dated November 2, 2021, December 22, 2021, and April 26, 2022, and Motion to Stay the Proceeding until the State Proceeding is concluded, including appeals to the US Supreme Court or the time for appeal has concluded, ((DI 95), herein referred to as “Rule 60 Motion”), and Plaintiff Meghan M Kelly’s Second Motion to stay the Proceeding until the conclusion of Respondent’s originating disciplinary proceeding until a final non-appealable determination is*

*made or the time of appeal has lapsed. Plaintiff further moves the Court for good cause for permission to file an Amended complaint 30 days after the stay is lifted.*

(DI 95 and 96, attached hereto and incorporated herein)

3. I believed the Rule 60 Motion would remove this Court's jurisdiction, automatically by giving jurisdiction back to the Delaware District Court. My mistaken belief was wrong, yet believed in good faith. My genuinely held belief is evidenced by my papers before this Court. I indicated my concern about filing a Rule 60 Motion to allow the Delaware District Court to regain jurisdiction only to potentially ping pong between courts, wasting judicial resources and burdening the parties. (See, Third Circuit Docket Item "3D" 3D-73-1, for example).

4. Upon receipt of the Order, I was at first horrified to learn my belief was in error.

5. I immediately began considering a motion for reconsideration to be filed within 14 days.

6. A day later, I read the Order and noticed the Court's kind direction providing, "If necessary, the appellant and district court can utilize the procedure explained in Federal Rule of Appellate Procedure 12.1 and Federal Rule of Civil Procedure 62.1." (3DI 94)

7. I began researching and drafting a motion before the Delaware District Court per the Court's kind guidance "*Plaintiff Meghan Kelly's Motion*

*pursuant to FRCP R. 62.1(a)(3) for statement this Court would grant my motions filed on October 11, 2022 or that the motions raise a substantial issue.”*

8. However, I re-read the part of the Order that placed fear in me of the loss of meaningful opportunity to be heard or the loss of Constitutional liberties, “This order does not change the previously established deadline for the appellant’s brief. The appeals may be dismissed without further notice if a brief is not filed. See 3d Cir. L.A.R. 107.2(b)” (3DI-94)

9. I pulled 3d Cir. L.A.R. 107.2(b), which states “(b) Notwithstanding subsection (a), if an appellant fails to comply with the Federal Rules of Appellate Procedure and the Local Appellate Rules with respect to the timely filing of a brief and appendix, **at any time after the seventh day following the due date**, the clerk is authorized to dismiss the appeal for want of timely prosecution.”

10. The date the Brief was due was October 17, 2022. My mistaken belief caused me to rely to my detriment on a false understanding that the District Court would regain jurisdiction. I was wrong. I have not drafted a brief. The brief is due October 25, 2022 to correct the delinquency.

11. My misunderstanding shows good cause to allow for additional time, in the amount this court deems just to file a brief in order to preserve meaningful opportunity to be heard.



12. I am also experiencing issues in other automatic discipline cases, which may be considered as good cause.

13 I am seeking to stay the disciplinary proceedings before the Eastern District of Pennsylvania and before the Supreme Court of Pennsylvania until the conclusion of both this civil rights case, and the appeal to the US Supreme Court on my original disciplinary case to prevent prejudice and irreparable injury to me, harm to the public, waste of resources by the court, and harm to Defendants.

14. I incorporated herein by reference the attached two motions I filed with the Eastern District of Pennsylvania.

15. I seek to stay disciplinary proceedings to *inter alias*, prevent needless waste of resources causing an obstacle so great, given my poverty and religious beliefs against debt as to violate my right to be heard in defense of fundamental rights.

16. I don't think it is fair for me to needlessly be compelled to go forward in reciprocating proceedings. I have the right to subpoena witnesses necessary to my defense, including Delaware Supreme Court members or agents and Defendants in reciprocating cases. This also is inconvenient for Defendants. The issues may be resolved on appeal of my original Delaware Discipline case, or in this open fair forum, in lieu of a biased forum whose disciplinary rules are focused on the mere appearance or reputation of the bar as opposed to truth and impartial

justice. Partiality to mere reputation of a profession as opposed to truth and justice guarantees injustice. Allowing a stay prevents duplicity of issues, conflicting findings, Constitutional injury, and other harm, especially in light of the fact the third Circuit's findings may supersede the Pennsylvania Supreme Court's determinations. I am sure the Defendants and the members of the Delaware Supreme Court do not want to be called as witnesses in other disciplinary forums, including the US Supreme Court. I am licensed before the US Supreme Court, and other additional forums where Defendants may needlessly be required to appear as witnesses should I be compelled to go forward.

17. I filed *Respondent Meghan Kelly's Motion pursuant to Local Rule 7.1 (g), FRCP 52, and in addition to or in the alternative of FRCP 59(e), for a rehearing on the Court Order Denying Request for ECF access , and my corrected Motion to Stay the Proceeding until the conclusion of both Respondent's originating disciplinary proceeding, and civil rights proceeding until final non-appealable determinations are made or the time of appeal has lapsed his Motion for reargument in the Eastern District of Pennsylvania in response to the denial of my motion for a stay, attached hereto and incorporated herein, and Respondent Meghan Kelly's Motion for good cause, to waive record, transcript fees, filing fees and other court costs by the Clerk and this Court.*

18. I also filed motions with the Delaware Supreme Court, the Delaware District Court case, and the Third Circuit disciplinary case, showing Constitutional concerns I have with lawyer self-regulation and third-party regulation of judges I incorporate herein by reference.

19. I seek to appeal the Third Circuit disciplinary proceeding by writing Justice Alito to safeguard not only my professional license to practice law, but the integrity of the Courts. Attorneys labeled disabled have fewer constitutional protections than disbarred and suspended lawyers in violation of the Equal Protections Clause. I am in the class of lawyers disparately treated, which enables me to bring the issue of attorney discipline and federal judge discipline before the US Supreme Court.

20. Federal judges fall within the umbrella of lawyers. I seek to argue against not only lawyer regulations, but also against regulating the federal judiciary too.

21. Federal judges should not be self-regulated, nor should they be regulated by third parties, including those administering potential congressional rules. Regulating federal judges would inhibit federal judges. They would no longer be free to administer justice by the creation of an unconstitutional temptation to be biased towards those who regulate their positions.

21. Judges and justice are not for sale to be compromised towards those who have authority over their seats in an un-Constitutional manner, even by collective groups of judges.

22. I also oppose term limits because that tempts judges to please those who have authority over their seats instead of allowing them to be free of public pressures and fickle fads to administer justice to all, not merely the majority.

23. I believe the only two ways to correct judges is in open court and by impeachment.

24. I believe judges are special. The executive and legislative branches give us a Republic by representation by majority vote. The judicial branch gives us freedom, under the name of a democracy in our Democratic Republic.

25. Judges should not be focused on productivity, costs and convenience at the sacrifice of individuals and individual liberty. Judges are special because they protect the Equal protection of individuals and their exercise of fundamental rights. Sameness is not equality under the Constitution. Equal protection means courts protect people's free exercise of belief by the dictates of their conscience, not the dictates of the majority, or the dictates of money.

26. The exchange of diverse beliefs and ideas helps us learn, improve products and services, and care about other people beyond our own.

27. I also have two legal theories to reverse or prevent the planned elimination of the dollar and fiat currency by a schemed economic crash that may be unraveled by the courts. If Kelly v Trump is vacated or rendered void, I would be able to sue President Biden not only for the relief I sought in Kelly v Trump but for relief to reverse or prevent an economic crash.

28. Because I have been grappling with these issues, I require time.

29. I also note the importance of people judges and people staff, and desire the opportunity to provide evidence down the line in a Court to show plans to eliminate judges and their staff by automation.

30. Computers cannot administer justice by discerning conditions outside the standardized algorithms. Judges are smarter than computers and have hearts capable of love towards humanity necessary to improve the world by actual justice.

31. I have had errors by the court's staff. Please look at my Rule 60 motion and motion to stay in the District Court. You will see my motion to stay was split between two Docket Item numbers. (DI 95, DI 96). Also see the letter I sent Judge Diamond. My exhibits were filed out of order, missing and included someone else's exhibits which prejudices my case and potentially will deny me an opportunity to be heard if not corrected. It is even more important to have people staff to correct errors in light of the fact mistakes like this happen. We are out of luck if we rely on cold hearted electronics.

32. Imperfect people who shed light on darkness, misunderstandings or mistakes should not be eliminated, including me. People who make mistakes should not be eliminated, including the two Chancery Court staff who were terminated in my case. (DI 58). I am so sad they were terminated to conceal evidence in my case.

33. When we conceal injustice or mistakes that is marketing the lie, the appearance of justice while making the world a worse place full of injustice.

34. We humans are imperfect. That is what makes the courts important. Sometimes, you guide the misguided, correct those who misunderstand, even correcting yourself by overturning precedent.

35. The goal of the Courts must be to care for humanity, not control them and destroy those who exercise free will and are not controlled by temptations to sin by threat of harm or enticement of reward. Injustice is guaranteed when we hide mistakes, or people who make them instead of learning from them and improving.

36. Judges need not be perfect to make the world fairer and just, neither do their staff or the lawyers before the Court.

37. My understanding is there will be planned attacks against the judiciary in the years to come. The courts must not give into temptation to be controlled by

those who entice their desire to defend such attacks to bend the will to the dictates of third parties.

38. I will not get into this further, as I must start the brief. I merely am indicating my desire to protect the judiciary, and defend my exercise of Constitutional liberties without being denied meaningful access to this court, because of misunderstanding as to the due date of the brief, or other courts.

39. I require time to fight these other good fights, which may also be good cause before this court.

40. I called my case manager on October 20, 2022. I wanted to thank her for the Court's guidance in its Order. I did not realize I had to file a Brief by Monday.

41. She was nice and understanding. She actually suggested I ask for an extension.

Wherefore, I pray this Court grants this motion.

Respectfully submitted,

Dated October 21, 2022

/s/Meghan Kelly

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Meghan Kelly, Esquire  
DE Bar Number 4968  
INACTIVE, not acting as an  
attorney on behalf of another  
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# Exhibit I

IN THE SUPREME COURT OF THE STATE OF DELAWARE

|                           |                           |
|---------------------------|---------------------------|
| IN THE MATTER OF A MEMBER | §                         |
| OF THE BAR OF THE SUPREME | § No. 58, 2022            |
| COURT OF DELAWARE         | § Board Case No. 115327-B |
|                           | §                         |
| MEGHAN M. KELLY,          | §                         |
| Respondent.               | §                         |

Respondent Meghan Kelly’s Motion for good cause, 1 Pursuant to Supreme Court Rule 9, to Unseal the Record, 2. to declare self-regulation of attorneys, other Professions, and judges unconstitutional, making business above the law, by making the dictates of professionals, or bureaucrats within agencies, as opposed to laws enacted by congress people, checked by the vote of the people, the law, and 3. in lieu of and in the alternative, eliminate the secret trial requirements of professionals before Boards, including the Board on Professional Responsibility, requiring the choice of an open or confidential forum left to the accused professional, instead of requiring a secret proceeding, concealing the accused’s defense, to the advantage of the accuser state, in violation of equal protections, and due process 1<sup>st</sup> and 14<sup>th</sup> Protections

Respondent Meghan Kelly’s Motion for good cause, 1 pursuant to Supreme Court Rule 9, to unseal the record in this case, 2. to declare self-regulation of attorneys, and judges unconstitutional, allowing impeachment and judicial determinations in case and controversies to be the only means to correct professionals, attorneys and judges, and 3. in the alternative, eliminate the secret trial requirements of professionals, requiring the choice of an open or closed forum to be at the discretion of the accused professional, instead of requiring a secret proceeding, concealing the accused’s defense, to the advantage of the accuser state, in violation of equal protections, and due process 1st and 14th protections.

**I Unsealing Pleadings in this case**

1. Opposing counsel did not object upon my request for their stance.

2. This Court filed an Order deactivating my license to practice law.

The Order requires I petition the Board in a secret proceeding, where documents are sealed, in order to have the mere opportunity to be heard, albeit before a biased forum, on restating my property interest in my active license to practice law.

3. I intend to file a Rule 18 Motion for Reargument on this Court's Order deactivating my active license to practice law.

4. I also intend to appeal the Order to the US Supreme Court, on the record.

5. I must report to the 6 other jurisdictions where I am licensed to practice law, after a decision is found on my Motion for Reargument or the time to Reargue has lapsed.

6. To my horror, the Clerk of Court sent out the unfinalized decision to every jurisdiction I am licensed to practice law, when I googled my name and discovered I was being sued in one such forum.

7. I may be sued by 6 courts based on this Court's unfinalized Order.

8. Should I lose on appeal or collateral attack in the DE District Court, I may be required to discuss the record of this matter, upon my petition for restatement as an active member of the bar.

9. I have one copy of the file in paper form. Yet, public access to court copies prevents economic costs that cause 1. a substantial burden upon my access to the courts in defense of my fundamental rights, and, 2 a substantial government burden requiring I choose between forgoing my free exercise of religious beliefs against indebtedness or my right to petition the Courts and the Board, relating to fundamental rights. Exhibit A <sup>1</sup>

10. My computer does not permit storage of all data, and gives limited room by professional design to force consumers to use the trackable internet storage systems.

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<sup>1</sup> Exhibit A shows my poverty, and my strong opposition, as an attorney, in inactive status, against term limits or Congressional control over the US Supreme Court. I also oppose self-regulation. Impeachment and law suits are the two means to correct judges. No judge should be controlled by business professionals, including professional boards, or by Congress, outside of written rules they may draft relating to impeachment. The judges will be tempted down the line by automation's ease, to potentially have their position as judges eliminated through automation. Automation has no power to render justice with mercy like judges. Judges have the ability to critically think beyond the standards, to see clearly the unique case before it, to render true justice based on truth, not conformity or sameness. Judges have a duty to protect people's freedom who think differently than they do, even if they believe those beliefs harm business's bottom line. What is more important money or freedoms under our constitution? I argue the Constitutional laws protecting individual liberty and individuals supersedes professions and entities who desire to sacrifice individual liberties or individuals for the entities or associations bottom line.

11. This Court is aware that my computers have broken, and have been replaced or repaired at times.

12. I require electronic access to documents, by making them public, to prevent a substantial burden on costs by requiring I copy physical documents to defend my person, should I lose, more data, as I have previously lost during this proceeding.

13. State Law librarian Galen Wilson kindly indicated he could pull public pleadings should I lose them for any technical reason.

14. More importantly, unsealing the documents, by my request, allows me a fairer opportunity to be heard in accordance with my asserted Due Process and Equal Protection Protections, as a party of one. US Amend I, XIV. Unsealing the documents grants me, the professional accused, the opportunity to be heard before the public too, as to defend my character before the world as a believer in Jesus Christ as savior, not in money for security.

15. The inherent, intentional, threat of releasing an opinion against the accused, while sealing the proceedings before the Board, and documents in the accused defense, places the accused, at a disadvantage. This practice is made to intentionally chill accused professionals' speech contained in the petitions to defend their position. The voices of professionals, including my voice, are

silenced by these inherently unjust rules. This punishes learning by silencing professional critical thinking to be conformed to the standards, which may exploit customers for convenience, costs, and material gain.

## II Self-Regulation

16. Self-regulation takes government out of the hands of the government and makes business above the law, by making business, and professionals desire for money, the law.

17. This biased self-regulation enslaves professionals to business greed, not good, not based on freedom in a fixed bad business economy.

18. Allowing Professionals to self-regulate, corrupts justice by tempting professionals to look after their own, at the cost of exploiting others, untamed by the just rule of law to prevent killing, stealing or destroying human life for what I argue is the mark of the beast, business greed. Professionals have a tendency to conceal their own misconduct to prevent harming their mere appearance, and reputation of their colleagues. <sup>2</sup>

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<sup>2</sup> As a Christian, I believe people sin for sacrificing justice to protect the illusion of the appearance of justice within the courts. Actual justice includes learning from our mistakes, not covering them up as this Court did by sealing four documents in *Kelly v Trump*, and terminating the employment of two court staff to conceal material evidence in my case. *John 7:24*, "Stop judging by mere appearances, but instead judge correctly."

19. Self-regulation by deferring to professional standards causes injustice, by preventing courts from correcting professional standards that harm people.

20. As a child of God, I believe people sin by teaching man to blindly trust science, professionals, experts, research or innovation. I believe people are misled to harm by blindly trusting in man, the creature, the created and his creation, his scientific work, research, products and services as god and guide.

21. Perfection is not the standard, even for judges. Where there is humility, there is grace, improving the world here and in eternity. Where Government and government backed partners teach loyalty to profession, pride in profession, or position above loyalty to the Constitution, or where business is the law, there is lawlessness, by sacrificing people, and individual liberty for material gain.

22. This lawlessness, and corruption within government creates a threat of economic, physical or social persecution against my person and the public.

23. Partial forums, including this Court's, as applied, and the Board's, focus on professions, guarantee lawless injustice by focus on money instead of caring for people and their individual liberty above money, productivity, costs and convenience.

24. The practice of law is not a mere business. The practice of law protects freedoms that are not for sale, by barter or exchange. Money is not the law. The practice of law requires independent, impartial, critically thinking judges who uphold people's Constitutionally protected freedoms to think, live, believe, exercise belief, associate by the dictates of their independent, individual conscience, not the dictates of money or professionals.

25. Injustice is guaranteed when a judicial determination is for sale, a matter of barter or exchange as opposed to truth under the law. This affords those without anything to exchange, except their souls to slavery in violation of the 13<sup>th</sup> Amendment, at a disadvantage, in violation of the Equal Protections Clause's protection of the poor, and common person's fundamental right to access to the courts. The Courts must be more concerned with actual justice than the mere appearance of justice to serve their positions.

III. I request the Court allow self-representation for all professionals accused  
before a Professional Board.

26. This Court requires I petition before the Professional Board in order for opportunity to be heard to regain my active license to practice law. The Board requires by default, sealed secret hearings that give the state an advantage to the detriment of the accused, me.



27. A closed proceedings before professional board violates my due process right to a fair trial applicable to the state pursuant to the First and Fourteenth Amendment.

28. It appears professionals are afforded fewer opportunities by impartial forums where the focus is on lawless lusts, business greed, business marketing, and materialism at the cost of denying justice to people unconditionally, not for sale, with focus on the bottom line of business.

29. These closed proceedings, as applied to me as a party of one, arguably violate my First Amendment right to free exercise of religious-political speech, religious-political belief, religious-political exercise, religious-political petition, and religious-political association.

30. The closed proceedings arguably violate the Due Process and Equal Protections under the law, of parties of unconfirming professionals, including me, who critically think beyond the standards that profit professionals at the detriment of the public, and the First Amendment right to Petition, pursuant to US Amend I, XIV.

31. Requiring a secret proceeding, concealing the accused's defense, to the advantage of the accuser state, while permitting the state to declare the final outcome, if it is detrimental to the accused professional to the public, disparages

the professional's character before opportunity to be heard on appeal, or with the reasonable, foreseeable intentional result of chilling the free exercise of critical thinking, belief, speech, professional affiliation, beyond the dumbed down conformed standards which stifle innovation by punishing free enterprise, free thought, and free debate.

32. The protected freedom of the people to use their minds, not economic force through money by profit or monetary penalties is what improves business, while protecting something more precious, individual freedom.

33. The closed proceedings disadvantage me, the accused, and creates injustice in the loss of fundamental rights, sold in exchange for the convenience of business, making even the courts corrupt, in that they focus on productivity, convenience, costs, in lieu of individuals and individual liberties, making people for sale, not free, by focusing on the bottom line.

34. Professional Boards should not make business and money the law. Impartial judges in the courts, and elected law makers should determine the law, based on critical independent thinking to determine the truth, not conformed to the force-fed thoughts of professionals who make money the law. The Equal Protections Clause may be violated by making those with something to barter, power, position or profit, able to buy justice, whereas the poor, though not less

valuable, are left with nothing to barter, but their own soul. Justice is not for sale, but is a matter of truth, not barter or exchange. I hate the scales the pagan goddess Lady justice carries, and hate her blind eyes and sword. A scale represents business, not equal protections under the law. I believe she teaches the way to hell by teaching justice can be compromised and weighted based on material gain. Mercy is more important than money. Correction in court to heal victims, while helping wrong doers improve by guiding them to make better choices, without controlling a no longer free people by artificial indebtedness, is more just. The sword represents heartless vengeance, with blind unconcern, not a loving leader shepherding his sheep. This dumbed down, ignorance is innocence, is a lie. I want judges to see clearly to care for the people. Judges need not be perfect, yet humble in that none are God, not even biased professionals, science or experts. I want judges to independently critically think, at the risk they may make mistakes. Otherwise, injustice will remain. Lawlessness will remain to be the letter of the law by allowing professionals in diverse areas to kill, steal and destroy for the bottom line, because they did not know. They did not care to know. They relied on the ever changing science. I believe people go to hell for not knowing, not using their own brain, which is sad. We should stop rewarding hardening our hearts from caring to know, to prevent the pain caused by loving others, which requires sacrifice to self.

35. God teaches vengeance is God's and if we play God we reflect the image of the lawless one Satan and are in danger of hell. It is scary when God says, Woe to those who draft unjust decrees. (Citing, *Isaiah* 10:1-6) I believe this means damned to hell are you should you not repent. Unjust decrees are based on love for money, driving out the love of humanity.

36. I want judges to see clearly, unblinded by desire for convenience conformity grants, but seeing clearly to seek true justice, to overturn unjust decrees.

37. The Sixth Amendment to the U.S. Constitution provides defendants in criminal cases with the right to a public trial. I argue this right must be extended to accused professionals. I have a Sixth Amendment right to a public trial to petition the Court to restate my active license to practice law.

#### IV. Risk of injustice to the Public

38. I realize that the Disciplinary Counsel in the 6 other jurisdictions I am licensed to practice law in may disagree with my request because it will eliminate their job, and may give them incentive to punish me more harshly, to look after their position at the public's expense.

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39. It is self-serving for me to cowardly exclude my request that this Court declare professional self-regulation of attorneys, other Professions, and judges unconstitutional.

40. Doing what is right and just, in the eyes of God, not man, is more important than doing what is beneficial to me.

Wherefore, I pray this Court grants my motion.

Dated August 15 , 2022 Respectfully submitted,

/s/Meghan M. Kelly  
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# Exhibit J

IN THE SUPREME COURT OF THE STATE OF DELAWARE

|                           |                           |
|---------------------------|---------------------------|
| IN THE MATTER OF A MEMBER | §                         |
| OF THE BAR OF THE SUPREME | § No. 58, 2022            |
| COURT OF DELAWARE         | § Board Case No. 115327-B |
|                           | §                         |
| MEGHAN M. KELLY,          | §                         |
| Respondent.               | §                         |

Respondent Meghan Kelly’s Motion to 1. declare the Reporting Requirements unconstitutional, requiring by written rule I violate my 5<sup>th</sup> Amendment right not to testify against myself to the government in order that the government may have evidence to prosecute me, 2. Declare the Case and Controversy requirements are not met in the system of attorney self-regulation

Respondent Meghan Kelly in “the interests of justice” pursuant to Rule 8, to 1. Declare the reporting requirements unconstitutional requiring by written rule I, and other disciplined attorneys, violate my 5th Amendment right not to testify against myself to the government in order that the government may have evidence to prosecute me, 2. Declare the Case and Controversy requirements are not met in the system of attorney self-regulation. US Amend V, U.S.C.A. Const. Art. 3, § 2, cl. 1.

**I. Factual Background**

1. On August 10, 2022, this Court filed an Order deactivating my license as disabled.

2. I incorrectly believed the Delaware Clerk of Court, Lisa Dolph, (“Clerk”), automatically gave the Order to every jurisdiction I am licensed to practice law in (“jurisdictions”).

3. On August 13, 2022, I filed the attached letter in the with the Third Circuit Court of Appeals in my Civil rights case, 21-3198 Exhibits. **(Exhibit A, excluding exhibits).**

4. Upon discovery, I learned the law clerk did not appear to send the Order to every jurisdiction where I am licensed to practice law.

5. I came to the realization, as soon as I report, I will be prosecuted by different governments I report to, in violation of the Constitution's Fifth Amendment protections and common sense.

6. At the threat of punishment, I must report. If I report I face greater punishment, than if I do not report, which does not seem fair. This is likened to the holocaust, where my ancestors in Lithuania faced threats by the Nazis, during World War II. The Nazis allegedly required imprisoned people to dig their own graves. So, they or their people may be killed and disposed of in the graves.

7. Similarly, the reporting requirements for attorney discipline proceedings requires I give the gun to other Courts. So, they may mechanically shoot me in the head, by reciprocation or worse.<sup>1</sup>

8. I filed the attached letter in the Third Circuit, striking language relating to reporting, and indicated it was for more informational purposes only. **(Exhibit B, without the attachments thereto).**

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<sup>1</sup>This is imagery, not a real gun.



9. Next, on August 16, 2022, I sent the attached letter to the Third Circuit, and similar letters to every other jurisdiction, by placing the same in the mail box, wherein, I invoked my Fifth Amendment right, requested a waiver of the reporting requiring, and additional time to report the discipline should the waiver be denied. **(Exhibit C)**.

10. On August 17, 2022, I received the attached Order from the Third Circuit indicating they would use the letter I filed in my civil rights case, any reason the Court deems. **(Exhibit D)**.

11. In the evening, around 6:50 PM, the Third Circuit Court deactivated my license to practice law. **(Exhibit E)**

12. I did not know how the Third Circuit found out, and asked Lisa Dolph, who referred me to the ODC.

13. I contacted the ODC per the attached email, and have not received her response. **(Exhibit F)**.

14. I regret I foolishly complied with reporting procedures that may have caused my prosecution in the Third Circuit Court. I should have known better as an attorney safeguarding Constitutional liberties, which preempt conflicting state laws and regulations. The United States Supreme Court held, “The Self-Incrimination Clause of the Fifth Amendment, which has been absorbed in the Fourteenth, extends its protection to lawyers, and should not be watered down by

imposing the dishonor of disbarment and the deprivation of livelihood as a penalty for asserting it.” Citing, *Spevack v. Klein*, 385 U.S. 511, 516 (1967) (holding that Fifth Amendment applies in attorney discipline proceeding). Nevertheless, I asserted the Fifth in all other jurisdictions, and argue this reporting requirement violates the Constitution and must be declared unenforceable against the Fifth Amendment, and public policy.

**II. The Reporting Rule is Unconstitutional by required waiver of the 5<sup>th</sup> Constitutional protections if not invoked.**

15. The rule requiring licensed attorneys to report disciplinary actions against their person in other jurisdictions, where they are licensed to practice law, is the rule in all federal and state courts. See Del. Law. R. of Disciplinary Proc. 18 (a).

16. I argue this rule is unconstitutional and must be declared unenforceable. Under the compelled government threat of punishment for failing to report, licensed attorneys must self-incriminate, in violation of US Amend. V. The self-reporting rules eliminate a Constitutional right unless invoked. An accused, me, should not have to invoke the 5<sup>th</sup>. The self-reporting rule per se violates the Constitution. The Constitution preempts this rule.

17. Requiring I report to this Court by written rule, and other courts where I am licensed to practice law, requires I provide evidence to the state in order that

they may prosecute me relating to my license to practice law in violation of my 5th Amendment right against self-incrimination.

18. In *In re Gi Yeong Nam*, 245 B.R. 216 (Bankr. E.D. Pa. 2000), the Court held:

“Once a witness voluntarily reveals an incriminating fact, Fifth Amendment privilege against self-incrimination cannot be invoked to avoid disclosing the details of that fact unless the witness’ answer to the particular question posed would subject him or her to a “real danger” of further incrimination.” U.S.C.A. Const. Amend. 5.

19. In my case, volunteering information by reporting orders against my license subjects me to automatic government prosecution. The fact I appeal orders on public record before appellate courts, does not remove the” real danger” of further government prosecution in proceedings bearing “a close relationship to proceedings criminal in nature.” *Id.*, and *Citing, Kelly v. Swartz*, No. CV 21-1490-CFC, 2021 WL 5083435, at \*2 (D. Del. Nov. 2, 2021).

20. Should I notify **state courts** of an order incriminating me, it appears the Clerk customarily gives the self-incriminating notice to the Office of Disciplinary Counsel who automatically prosecutes.

21. In **federal courts**, the procedures are different. It appears the self-incriminating-reporting letter is given to a federal judge or a panel of federal judges, who may choose to prosecute the attorney by reciprocal deactivation of

license or by a heftier penalty. Either way, there is an automatic deactivation of my license once a case is open.

22. The rules give the illusion of impartial discretion, but prosecution appears mandatory. Sam, a staff at the Delaware District Court, said she had no choice. She was required to follow the procedures against my license, which includes automatic suspension of my lawyer privileges, as the Court automatically reciprocates any Order disciplining lawyers.

23. Should a federal judge or panel of federal judges elect to prosecute me, or other attorney through reciprocity, the Court is required to issue a notice allowing attorneys to show for good cause why such automatic taking of property interest must not occur.

24. I, the accused disciplined attorney, am required to bear the burden to prove my innocence or defect in the process, against the assumed guilt. The burden of guilt until proven innocence appears to violate my Fifth Amendment rights. I reserve this issue for appeal, while acknowledging I must research this.

### **III. The system of reciprocity violates Case and Controversy Requirements**

25. Federal reciprocity requires the Court to be the prosecutor, the judge and witness too, not an outside adverse party, violating the case or controversy requirements of U.S.C.A. Const. Art. 3, § 2, cl. 1.

26. In federal reciprocity cases, I would not serve an opposing counsel in the US Supreme Court or any other federal court, should reciprocal discipline be conducted against me. I would be defending myself against required Court prosecution where I, the accused, would bear the burden of clear and convincing evidence as to why the Court must not prosecute me, in potential violation of my Fifth Amendment rights.

27. The Third Circuit held,

“The existence of a case or controversy requires: (1) a legal controversy that is real and not hypothetical; (2) a legal controversy that affects an individual in a concrete manner so as to provide the factual predicate for reasoned adjudication; and (3) a legal controversy with sufficiently adverse parties so as to sharpen the issues for judicial resolution. *Rendell v. Rumsfeld*, 484 F.3d 236 (3d Cir. 2007)

28. The Third element is not met in all cases before federal disciplinary hearings. There is no adversarial party when the entity prosecuting is judge and jury, including mine. This system of reporting must be overturned to preserve the Constitutional liberties of the accused. This issue is capable of repetition, yet evading review, and should be, in the interest of justice under Rule 8, be considered by an impartial, nonfederal, judicial forum. A federal court will not admit it violates the Constitution by blindly adhering to its internal procedures, even the United States Supreme Court requires the same. This Court must, in the interest of justice, consider these important issues.

**IV The case and controversy requirements are not met in my case.**

29. There arguably is no controversy in my case, just a cover up of court misconduct, elimination of witnesses, the wrongful removal of four public documents material to my defense from public records, and government persecution towards me, but for my First Amendment exercise of or assertion of my protected Constitutional rights

30. The record shows, I do not intend to practice law before the courts should the restriction on my license be lifted. I intend to seek to rejoin my former law firm where I would perform real estate settlements.

31. There is no harm to the state showing a case or controversy. There are mere complaints about run on sentences, typos, and citations to the sham fixed transcript, I maintain my objection to, where the reporter misrepresented what I said to intentionally collude to fix the outcome or because she could not hear me.

32. The record also shows the State laments I discuss the bible as a source of my religious belief relating to petitions where I assert and defend my religious exercise. My religious beliefs and compelled violation of those beliefs and exercise of my religious beliefs are in issue as the protected liberty interest I sought to protect in *Kelly v Trump*, and one of the liberty interests I seek to defend in this present case. It is unconstitutional for the Court to persecute me, because I invoke my First Amendment right of **belief**, religious-political-belief, religious-political **exercise**, religious-political-**association**, religious-political-**speech**, and my right to

**petition** the Court to uphold these religious-political fundamental rights, despite the State's disagreement with my beliefs, typos, or inconvenience that my poverty creates to the court.

33. The State is aware of my circumstance. Due to lack of resources, working computers, printers, paper and other luxuries, I had typos and run on sentences in some of my pleadings. I did not have the luxury of time or resources to proof read or correct documents. I typed desperately wherever I could use computers or print documents, including at libraries, with limited time at the computer. I was required to file timely or waive my rights. I do not regret imperfectly standing up for my religious belief from government persecution.

34. I would regret doing nothing. If I am unable to exercise the most basic First Amendment rights, speech, belief, association, exercise of belief and petition, then I may logically assume others are not free. Standing up for myself, now, no matter how imperfectly, may create precedent to stand up for the rights of others, well past my fleeting, soon to be forgotten life here.

35. The Court also grasps at straws by holding there is evidence of either a physical or mental disability. The state appears to be claiming my belief in Jesus is a disability, or there is a physical disability alluding to a possible physical disability as a harm to the state, with unclean hands, as the State has notice of my limitations. The state rushed the proceeding in violation of my right for an

opportunity to be heard, notice, an opportunity to prepare and defend perform discovery, call witnesses, having motions ignored, left unaddressed, in the forum below, or above, and intentionally caused foreseeable emotional distress, in hopes to make me physically ill to use it against me, like heartless monsters.

36. I dispute the allegation of physical disabilities as an “or” source for this Court’s holding. The record excludes sufficient evidence to make such a finding. Even if on appeal, the Court finds physical limitations, such as the shingles temporarily caused in my case or otherwise, such limitations would not limit my ability to practice law. And if such limitations are found, I invoke the protections of ADA protecting me from state discrimination, either by denial of meaningful access to the courts based on alleged disability, or denial of First amendment rights based on such disability, or my license to practice law based on any such alleged disability, without accommodation by the state. I reserve this for appeal.

37. Whether Constitutional protections are violated by the reciprocity system is a more important issue than mere appearance, and productivity, in terms of material gain for professions or businesses, at the cost of sacrificing freedoms.

38. The Courts, as government servants, work for justice, not money. If government judges, law makers and presidents care more about money and draft,



enforce, and uphold rules that violate the more important Constitutional laws, than none of us are free.

39. If money is the law, then the people are slaves to the government by artificially indebtedness, under the guise of freedom.

40. I have a duty to uphold the Constitutional laws that protect something more precious than all the money in the world, individual liberty from government incited private or public economic, physical or social burdens upon, but for the exercise of such Constitutional rights.

41. This Court's duty to uphold the same is even more stringent. The Constitution protects me, from the Government, including the Court, from persecuting me for the exercise of my fundamental rights.

42. Sameness is not fairness. Respecting people's individual liberty to believe, think, associate, live, exercise belief, and rights by the dictates of their conscience, no matter if it does not conform to the majority is a duty of this court.

43. In order to safeguard freedom, the government must let go of control, allowing lawful disorder the exercise of liberties and freedom creates in a world where not everyone is the same or chooses to believe the same or live the same.

44. The government's duty is to care for people, while protecting the people's freedom, not control and exploit the people for material gain and

productivity, under the guise of order and improving the man-made-unnatural economy.

45. The issues relating to government compelled self-incrimination by the reporting requirements and the case and controversy issues are capable of repetition, yet, evading review. This Court must in the interest of justice consider these Constitutional issues. Otherwise, no other Court may and violations of freedom for the convenience of the government backed private business partners will continue into infinity, sacrificing humans for business greed, not good.

Wherefore, I pray the Court grants my Motion or at least entertains Constitutional concerns.

Dated August 19, 2022 Respectfully submitted,

/s/Meghan M. Kelly  
Meghan Kelly, Esquire  
DE Bar Number 4968 (Deactivated License)  
34012 Shawnee Drive  
Dagsboro, DE 19939  
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(302) 493-6693 (2,522 Words)

# Exhibit K

**MEGHAN MARIE KELLY**  
.....

34012 Shawnee Drive  
Dagsboro, DE 19939

**Justices of the DE Supreme Court**  
c/the Clerk of Court  
55 The Green  
Dover, DE 19901

RE: No. 22-58 Meghan Kelly: Federal Reserve

August 29, 2022

Dear Honorable Court:

The State filed a petition against me for inter alias my political-religious beliefs contained in my RFRA petition to dissolve the establishment of government religious under former President Donald J. Trump. My political proposals and ideas are in issue. Even bad ideas are protected. If we cannot share our ideas than we cannot learn they are bad to improve.

I believe this court may reverse or prevent a crash. If this courts think my ideas are bad, at least I can face God on judgment day. I know I tried to do what I believed was right, by humbling myself before you, asking you to please consider saving the world. The Courts are my hope of a hero, even if this Court is mad at me for my religious-political petitions containing speech reflecting my genuinely held religious beliefs.

The way money is coined is the problem. In 1913, President Wilson signed the Federal Rights Act, which created the Federal Reserve. The Federal Reserve is a private corporation, containing banks as shareholders.<sup>1</sup> The employees of the

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<sup>1</sup> *Hubbard v. Fed. Rsr. Bank of Atlanta*, No. CIV.A. 96-2354, 1996 WL 551496, at \*1 (E.D. La. Sept. 26, 1996) (“Federal Reserve Banks are independent corporations owned by commercial banks in their geographic regions”); *Id.* (“While the Federal Reserve Board regulates the Reserve Banks, direct supervision and control of each Bank is exercised by its board of directors. 12 U.S.C. § 301. Each Reserve Bank is statutorily empowered to conduct its activities **without day-to-day direction from the federal government.**”); *Lewis v. United States*, 680 F.2d 1239 (9th Cir. 1982) (“Federal reserve banks are **not federal instrumentalities** for purposes of a Federal Tort Claims Act, but are **independent, privately owned and locally controlled corporations** in light of fact that direct supervision and control of each bank is exercised by board of directors, federal reserve banks, though heavily regulated, are **locally controlled by their member banks, banks are listed neither as “wholly owned” government corporations nor as “mixed ownership” corporations**; federal reserve banks receive no appropriated funds from Congress and the banks are empowered to sue and be sued in their own names.” 28 U.S.C.A. §§ 1346(b), 2671 et seq.; *Federal Reserve Act*, §§ 4, 10(a, b), 13, 13a, 13b, 14, 14(a–g), 16, 12 U.S.C.A. §§ 301, 341–360; 12 U.S.C.A. § 361; *Government Corporation Control Act*, §§ 101, 201, 31 U.S.C.A. §§ 846, 856.)); *Schaffer v. Pub. Emps. Ret. Sys.*, 21 Ohio St. 3d 86, 91, 488 N.E.2d 162, 165 (1986) (“Dissent, In *Lewis v. United States* (C.A. 9, 1982), 680 F.2d 1239, and *Arney v. United States* (Dec. 4, 1979), D.Tenn.No. 77–3503–NA–CV, unreported, the courts held that federal reserve banks were **not federal agents** for purposes of the Federal Tort Claims Act, Section 1346(b), Title 28, U.S. Code. Both courts noted that Congress structured the reserve banks as **corporate entities owned by commercial banks** ‘under the supervision and control’ of their own boards of directors and subject only to general supervision by the Board of Governors of the Federal Reserve System. See Sections 301 and 248(j), Title 12, U.S. Code. Both the *Lewis* and *Arney* courts thoroughly analyzed the operation and the legislative history of the Federal Reserve Act and found, among other things, that the federal government had no financial involvement in the banks, the banks were **independent corporations**, the banks primarily serviced **private business** and

Federal Reserve appear to gain the benefits of federal employees, such as retirement, while not being subjected to the liability in the form of federal limits.<sup>2</sup>

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financial entities, and the federal government did not control the daily operation of the banks.

These courts also found that **federal reserve bank employees were not subject to federal governmental control**. The bank had the right to hire and fire its employees. The employees did not participate in the civil service retirement system or the federal workers' compensation programs, they were not subject to federal travel regulations, and they did not receive governmental employees discounts. The Federal Reserve Act reflects the Congressional intent that federal reserve banks remain non-governmental entities. Although federal reserve bank policy with respect to interest rates and the like remains under the general supervision of the federal reserve board, the banks are private entities separate and distinct from the government.

The drafters of the Federal Reserve Act made clear the private function of federal reserve banks:

'The Federal reserve banks \* \* \* would be in effect cooperative institutions, carried on for the benefit of the community and of the banks themselves by the banks acting as stockholders therein. \* \* \* The committee, however, recommends that they shall be individually organized and individually controlled, each holding the fluid funds of the region in which it is organized and each ordinarily dependent upon no other part of the country for assistance. The only factor of centralization which has been provided in the committee's plan is found in the Federal reserve board, which is to be a strictly Government organization created for the purpose of inspecting existing banking institutions and of regulating relationships between Federal reserve banks and between them and the government itself.' H.R.Rep. No. 69, 63rd Cong., 1st Sess. (1913), 17–18.”)

<sup>2</sup> *Lewis v. United States*, 680 F.2d 1239 (9th Cir. 1982), (“The Reserve Banks are deemed to be federal instrumentalities for purposes of immunity from state taxation.”)

*Schaffer v. Pub. Emps. Ret. Sys.*, 21 Ohio St. 3d 86, 488 N.E.2d 162 (1986) (“The Supreme Court held that federal reserve bank is “governmental entity ‘operated by’” United States Government so as to **qualify for credit within Public Employees Retirement System**”); [This does not seem fair that they get federal retirement benefits without oversight or Constitutional limits as a nonfederal instrumentality.] *See also, Farm Credit of Nw. Fla., ACA v. Easom Peanut Co.*,

An agent of the Federal Reserve banks makes at least one request, per year for the government to issue money, called federal reserve notes. The Federal Reserve may require additional requests for emergencies such as the emergency related to hurricane Katrina.

Federal Reserve Notes are the only type of currency circulating in the US. Please see the Exhibit A attached hereto, which contains a dollar bill, a five dollar bill, a ten dollar bill and a twenty dollar bill.

On the front of each bill, you see the label Federal Reserve Note. The government issues money, called federal reserve notes and gives them to the Federal Reserve for use by its bank members, while increasing debts of the government to enslave a no longer free people to pay back the free lunch for the bank's members' gain.

The notes are backed by financial assets that the Federal Reserve Banks pledge as collateral, which are not actually owned by the banks under fractional

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312 Ga. App. 374, 384–85, 718 S.E.2d 590, 602 (2011) (Holding this bank entity was immune from suit as a government instrumentality, which makes banks above the law); *But See, McGee v. Tucoemas Fed. Credit Union*, 153 Cal. App. 4th 1351, 63 Cal. Rptr. 3d 808 (2007) (This Court holds the banks waive immunity); *Rheams v. Bankston, Wright & Greenhill*, 756 F. Supp. 1004 (W.D. Tex. 1991) (“Federal Home Loan Bank of Dallas was not a “federal agency” within meaning of Federal Tort Claims Act and its employees were not employees of government for purposes of removing case to federal court. 28 U.S.C.A. §§ 1346(b), 2671.”).

reserves. The notes are backed by other people's assets, which I believe is the definition of a Ponzi scheme. The notes are mainly backed by Treasury securities and mortgage agency securities that the banks purchase on the open market by fiat payment using other people's money as their own through fractional reserve banking theories.

This would likely jeopardize people's land and homes, should an economic crash occur, to serve the greed of banks and profiteering private and foreign entities, not the welfare of the people or this nation.

I am concerned this may cause a foreclosure crisis, leaving many homeless, if the court does not consider the welfare of the people more important than debt control, and power money grants to those who have it by unjust gains to buy influence.

The Federal reserve should not be charged with controlling the currency. The government must take back its coining power to care for the people while protecting individual liberty, not controlling the people, through money by indebtedness and grants to entities as opposed to individuals in need.

The shareholding banks have incentive to make America and the people worse off. Banks gain more profit on debt interest, the worse off, and the more debt America and Americans are in.



The wars we wage, are never for freedom, but enslave the people to pay back the debt and debt on interest to the banks, the Federal Reserve gains through military spending, while enriching businesses who make money off of the artificially created need to serve greed under the guise of liberty.

There is a movement by global leaders to eliminate war, under the lie of peace, which is created by the elimination of freedom by government backed private and foreign control.

I prefer the discord the liberty to think, believe, associate, worship, requires in order to safeguard Constitutional rights, than the wicked peace the global leaders appear to seek. As a Christian, I follow Jesus who teaches me, not to come for peace, but come to cut off lawlessness stemmed in lusts that destroys people in this life and damns people in hell by justice in the courts, not productivity to serve the lawlessness of Satan, business greed. *Matthew 10:34, 23:23.*

Those who preach “order” serve lawless lusts. They do not serve Constitutional law by upholding liberties from government backed private or foreign control of the peoples substantially burdened will. I believe this not only leads to harm in this life but damnation in hell, without court correction.

Per the attached Exhibit B, there are global plans to create more waste, to create more debt, to gain more profit on debt for banks, and artificial need to serve

business greed, under the pretty name of science, to maintain debt control over the world.

People are literally coming up with deceptive theories to kill, steal and destroy and harm humanity to maintain power, profit and position.

The excerpts in the book attached hereto talks about intentionally making people sick by the food and water to control population or otherwise, creating a space race to create waste, to create waste by nuclear arms checks or nuclear races, creating race wars, and other evil.

There literally is reward for harming humanity under the lie of helping it.

I have a number of legal theories to prevent this economic crash, while preventing harm to humanity. Opposing counsel opposed my desire to draft a motion on this awhile back.

I do not have time to draft a letter outlining my legal theories for this Court. A letter may save the court time, should I bring a mistrial against *Kelly v Trump* espousing theories this Court may reject or require additional information to consider.

I would like an opportunity to be heard in the reciprocal cases. I must focus on the reciprocal law suits that require a more immediate or urgent response as opposed to this Court.

I must not be denied opportunities to be heard in other forums, by taking time now in this forum, time I do not have to spend, without sacrificing justice elsewhere.

Thank you for your time and consideration of this important matter. I apologize to this Court should I fail to outline how this Court may save the world, even if you seek to destroy mine.

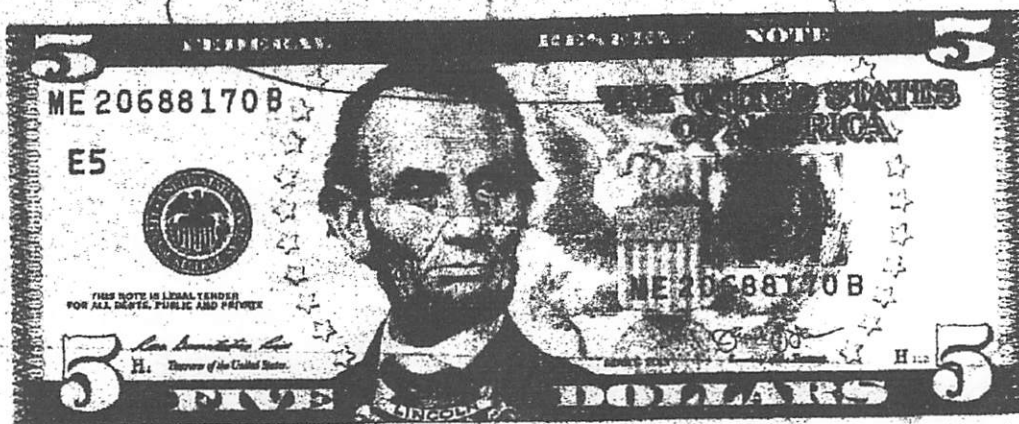
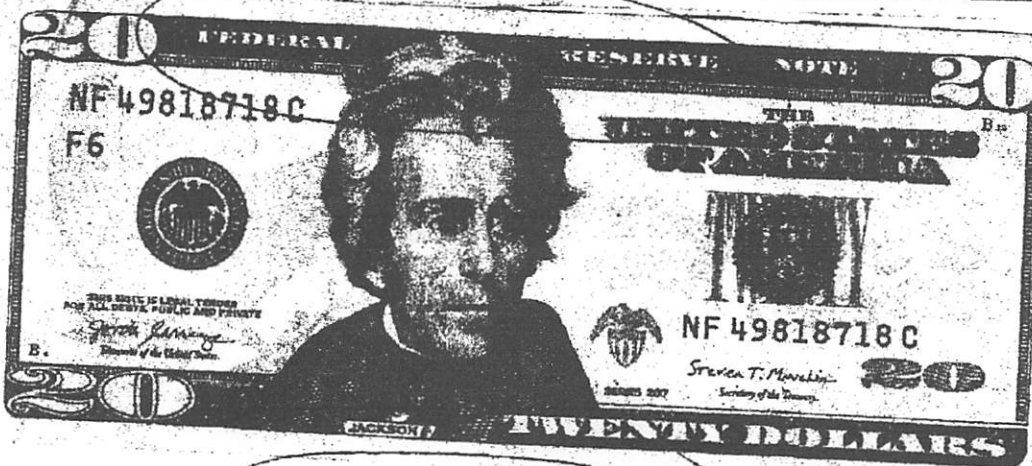
My hope remains in the courts.

August 29, 2022

Respectfully Submitted,

/s/Meghan Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
302-493-6693  
Bar No 4968 DEACTIVE(119 words)

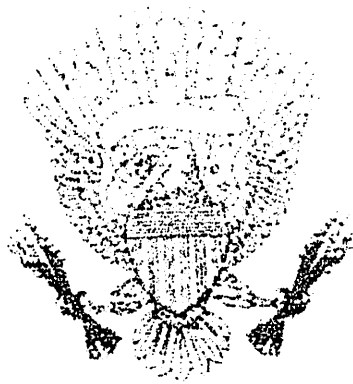
# Exhibit A



# Exhibit B

# REPORT FROM IRON MOUNTAIN

**On the Possibility & Desirability of Peace**



**SUPPRESSED**

THIS REPORT/DOCUMENT/SATIRE IS SUBJECT TO THE  
HIGHEST SECURITY CLASSIFICATION AND ACCESS TO  
IT OR CONFIRMATION OF ITS EXISTENCE IS LIMITED  
TO PERSONS CLEARED BY CONTINGENCY EVALUATION  
COMMITTEE. THIS ORDER IS ABSOLUTE UP TO AND  
INCLUDING PRESIDENTIAL LEVEL

**LEONARD C. LEWIN**

With a new introduction by Victor Navasky and an appendix  
on the "Iron Mountain Affair"

SECTION 6

SUBSTITUTES FOR  
THE FUNCTIONS OF WAR

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**B**Y NOW IT SHOULD BE CLEAR that the most detailed and comprehensive master plan for a transition to world peace will remain academic if it fails to deal forthrightly with the problem of the critical nonmilitary functions of war. The social needs they serve are essential; if the war system no longer exists to meet them, substitute institutions will have to be established for the purpose. These surrogates must be "realistic," which is to say of a scope and nature that can be conceived and implemented in the context of present-day social capabilities. This is not the truism it may appear to be; the requirements of radical social change often reveal the distinction between a most conservative projection and a wildly utopian scheme to be fine indeed.

In this section we will consider some possible substitutes for these functions. Only in rare instances have they been put forth for the purposes which concern us here, but we see no reason to limit ourselves to proposals that address themselves explicitly to the problem as we have outlined it. We will disregard the ostensible, or military, functions of war; it is a premise of this study that the transition to peace implies absolutely that they will no longer exist in any relevant sense. We will also disregard the non-critical functions exemplified at the end of the preceding section.



*Economic*

Economic surrogates for war must meet two principal criteria. They must be "wasteful," in the common sense of the word, and they must operate outside the normal supply-demand system. A corollary that should be obvious is that the magnitude of the waste must be sufficient to meet the needs of a particular society. An economy as advanced and complex as our own requires the planned average annual destruction of not less than 10 percent of gross national product<sup>1</sup> if it is effectively to fulfill its stabilizing function. When the mass of a balance wheel is inadequate to the power it is intended to control, its effect can be self-defeating, as with a runaway locomotive. The analogy, though crude,<sup>2</sup> is especially apt for the American economy, as our record of cyclical depressions shows. All have taken place during periods of grossly inadequate military spending.

Those few economic conversion programs which by implication acknowledge the nonmilitary economic function of war (at least to some extent) tend to assume that so-called social-welfare expenditures will fill the vacuum created by the disappearance of military spending. When one considers the backlog of unfinished business—proposed but still unexecuted—in this field, the assumption seems plausible. Let us examine briefly the following list, which is more or less typical of general social-welfare programs.<sup>3</sup>

*Health.* Drastic expansion of medical research, education, and training facilities; hospital and clinic construction; the general objective of *complete* government-guaranteed health care for all, at a level consistent with current developments in medical technology.

*Education.* The equivalent of the foregoing in teacher training; schools and libraries; the drastic upgrading of

standards, with the general objective of making available for all an attainable educational goal equivalent to what is now considered a professional degree.

*Housing.* Clean, comfortable, safe, and spacious living space for all, at the level now enjoyed by about 15 percent of the population in this country (less in most others).

*Transportation.* The establishment of a system of mass public transportation making it possible for all to travel to and from areas of work and recreation quickly, comfortably, and conveniently, and to travel privately for pleasure rather than necessity.

*Physical environment.* The development and protection of water supplies, forests, parks, and other natural resources; the elimination of chemical and bacterial contaminants from air, water, and soil.

*Poverty.* The genuine elimination of poverty, defined by a standard consistent with current economic productivity, by means of a guaranteed annual income or whatever system of distribution will best assure its achievement.

This is only a sampler of the more obvious domestic social welfare items, and we have listed it in a deliberately broad, perhaps extravagant, manner. In the past, such a vague and ambitious-sounding "program" would have been dismissed out of hand, without serious consideration; it would clearly have been, *prima facie*, far too costly, quite apart from its political implications.<sup>4</sup> Our objection to it, on the other hand, could hardly be more contradictory. As an economic substitute for war, it is inadequate because it would be far too cheap.

If this seems paradoxical, it must be remembered that up to now all proposed social-welfare expenditures have had to be measured *within* the war economy, not as a replacement for it. The old slogan about a battleship or an

ICBM costing as much as  $x$  hospitals or  $y$  schools or  $z$  homes takes on a very different meaning if there are to be no more battleships or ICBM's.

Since the list is general, we have elected to forestall the tangential controversy that surrounds arbitrary cost projections by offering no individual cost estimates. But the maximum program that could be physically effected along the lines indicated could approach the established level of military spending only for a limited time—in our opinion, subject to a detailed cost-and-feasibility analysis, less than ten years. In this short period, at this rate, the major goals of the program would have been achieved. Its capital-investment phase would have been completed, and it would have established a permanent comparatively modest level of annual operating cost—*within the framework of the general economy.*

Here is the basic weakness of the social-welfare surrogate. On the short-term basis, a maximum program of this sort could replace a normal military spending program, provided it was designed, like the military model, to be subject to arbitrary control. Public housing starts, for example, or the development of modern medical centers might be accelerated or halted from time to time, as the requirements of a stable economy might dictate. But on the long-term basis, social-welfare spending, no matter how often redefined, would necessarily become an integral, accepted part of the economy, of no more value as a stabilizer than the automobile industry or old age and survivors' insurance. Apart from whatever merit social-welfare programs are deemed to have for their own sake, their function as a substitute for war in the economy would thus be self-liquidating. They might serve, however, as expedients pending the development of more durable sub-

stitute measures.

Another economic surrogate that has been proposed is a series of giant "space-research" programs. These have already demonstrated their utility in more modest scale within the military economy. What has been implied, although not yet expressly put forth, is the development of a long-range sequence of space-research projects with largely unattainable goals. This kind of program offers several advantages lacking in the social-welfare model. First, it is unlikely to phase itself out, regardless of the predictable "surprises" science has in store for us: the universe is too big. In the event some individual project unexpectedly succeeds there would be no dearth of substitute problems. For example, if colonization of the moon proceeds on schedule, it could then become "necessary" to establish a beachhead on Mars or Jupiter, and so on. Second, it need be no more dependent on the general supply-demand economy than its military prototype. Third, it lends itself extraordinarily well to arbitrary control.

Space research can be viewed as the nearest modern equivalent yet devised to the pyramid-building, and similar ritualistic enterprises, of ancient societies. It is true that the scientific value of the space program, even of what has already been accomplished, is substantial on its own terms. But current programs are absurdly and obviously disproportionate, in the relationship of the knowledge sought to the expenditures committed. All but a small fraction of the space budget, measured by the standards of comparable scientific objectives, must be charged *de facto* to the military economy. Future space research, projected as a war surrogate, would further reduce the "scientific" rationale of its budget to a minuscule percentage indeed.

As a purely economic substitute for war, therefore, extension of the space program warrants serious consideration.

In Section 3 we pointed out that certain disarmament models, which we called conservative, postulated extremely expensive and elaborate inspection systems. Would it be possible to extend and institutionalize such systems to the point where they might serve as economic surrogates for war spending? The organization of fail-safe inspection machinery could well be ritualized in a manner similar to that of established military processes. "Inspection teams" might be very like armies, and their technical equipment might be very like weapons. Inflating the inspection budget to military scale presents no difficulty. The appeal of this kind of scheme lies in the comparative ease of transition between two parallel systems.

The "elaborate inspection" surrogate is fundamentally fallacious, however. Although it might be economically useful, as well as politically necessary, during the disarmament transition, it would fail as a substitute for the economic function of war for one simple reason. Peacekeeping inspection is part of a war system, not of a peace system. It implies the possibility of weapons maintenance or manufacture, which could not exist in a world at peace as here defined. Massive inspection also implies sanctions, and thus war-readiness.

The same fallacy is more obvious in plans to create a patently useless "defense conversion" apparatus. The long-discredited proposal to build "total" civil defense facilities is one example; another is the plan to establish a giant antimissile missile complex (Nike-X, *et al.*). These programs, of course, are economic rather than strategic. Nevertheless, they are not substitutes for military spending but merely different forms of it.

A more sophisticated variant is the proposal to establish the "Unarmed Forces" of the United States.<sup>5</sup> This would conveniently maintain the entire institutional military structure, redirecting it essentially toward social-welfare activities on a global scale. It would be, in effect, a giant military Peace Corps. There is nothing inherently unworkable about this plan, and using the existing military system to effectuate its own demise is both ingenious and convenient. But even on a greatly magnified world basis, social-welfare expenditures must sooner or later reenter the atmosphere of the normal economy. The practical transitional virtues of such a scheme would thus be eventually negated by its inadequacy as a permanent economic stabilizer.

#### *Political*

The war system makes the stable government of societies possible. It does this essentially by providing an external necessity for a society to accept political rule. In so doing, it establishes the basis for nationhood and the authority of government to control its constituents. What other institution or combination of programs might serve these functions in its place?

We have already pointed out that the end of war means the end of national sovereignty, and thus the end of nationhood as we know it today. But this does not necessarily mean the end of nations in the administrative sense, and internal political power will remain essential to a stable society. The emerging "nations" of the peace epoch must continue to draw political authority from some source.

A number of proposals have been made governing the relations between nations after total disarmament; all are

basically juridical in nature. They contemplate institutions more or less like a World Court, or a United Nations, but vested with real authority. They may or may not serve their ostensible postmilitary purpose of settling international disputes, but we need not discuss that here. None would offer effective external pressure on a peace-world nation to organize itself politically.

It might be argued that a well-armed international police force, operating under the authority of such a supranational "court," could well serve the function of external enemy. This, however, would constitute a military operation, like the inspection schemes mentioned, and, like them, would be inconsistent with the premise of an end to the war system. It is possible that a variant of the "Unarmed Forces" idea might be developed in such a way that its "constructive" (i.e., social-welfare) activities could be combined with an economic "threat" of sufficient size and credibility to warrant political organization. Would this kind of threat also be contradictory to our basic premise?—that is, would it be inevitably military? Not necessarily, in our view, but we are skeptical of its capacity to evoke credibility. Also, the obvious destabilizing effect of any global social-welfare surrogate on politically necessary class relationships would create an entirely new set of transition problems at least equal in magnitude.

Credibility, in fact, lies at the heart of the problem of developing a political substitute for war. This is where the space-race proposals, in many ways so well suited as economic substitutes for war, fall short. The most ambitious and unrealistic space project cannot of itself generate a believable external menace. It has been hotly argued<sup>6</sup> that such a menace would offer the "last, best hope of peace," etc., by uniting mankind against the danger of destruction

by "creatures" from other planets or from outer space. Experiments have been proposed to test the credibility of an out-of-our-world invasion threat; it is possible that a few of the more difficult-to-explain "flying saucer" incidents of recent years were in fact early experiments of this kind. If so, they could hardly have been judged encouraging. We anticipate no difficulties in making a "need" for a giant super space program credible for economic purposes, even were there not ample precedent; extending it, for political purposes, to include features unfortunately associated with science fiction would obviously be a more dubious undertaking.

Nevertheless, an effective political substitute for war would require "alternate enemies," some of which might seem equally farfetched in the context of the current war system. It may be, for instance, that gross pollution of the environment can eventually replace the possibility of mass destruction by nuclear weapons as the principal apparent threat to the survival of the species. Poisoning of the air, and of the principal sources of food and water supply, is already well advanced, and at first glance would seem promising in this respect; it constitutes a threat that can be dealt with only through social organization and political power. But from present indications it will be a generation to a generation and a half before environmental pollution, however severe, will be sufficiently menacing, on a global scale, to offer a possible basis for a solution.

It is true that the rate of pollution could be increased selectively for this purpose; in fact, the mere modifying of existing programs for the deterrence of pollution could speed up the process enough to make the threat credible much sooner. But the pollution problem has been so widely publicized in recent years that it seems highly

improbable that a program of deliberate environmental poisoning could be implemented in a politically acceptable manner.

However unlikely some of the possible alternate enemies we have mentioned may seem, we must emphasize that one *must* be found, of credible quality and magnitude, if a transition to peace is ever to come about without social disintegration. It is more probable, in our judgment, that such a threat will have to be invented, rather than developed from unknown conditions. For this reason, we believe further speculation about its putative nature ill-advised in this context. Since there is considerable doubt, in our minds, that *any* viable political surrogate can be devised, we are reluctant to compromise, by premature discussion, any possible option that may eventually lie open to our government.

### *Sociological*

Of the many functions of war we have found convenient to group together in this classification, two are critical. In a world of peace, the continuing stability of society will require: 1) an effective substitute for military institutions that can neutralize destabilizing social elements and 2) a credible motivational surrogate for war that can insure social cohesiveness. The first is an essential element of social control; the second is the basic mechanism for adapting individual human drives to the needs of society.

Most proposals that address themselves, explicitly or otherwise, to the postwar problem of controlling the socially alienated turn to some variant of the Peace Corps or the so-called Job Corps for a solution. The socially disaffected, the economically unprepared, the psychologically unconformable, the hard-core "delinquents," the incorrigi-

ble "subversives," and the rest of the unemployable are seen as somehow transformed by the disciplines of a service modeled on military precedent into more or less dedicated social service workers. This presumption also informs the otherwise hardheaded ratiocination of the "Unarmed Forces" plan.

The problem has been addressed, in the language of popular sociology, by Secretary McNamara. "Even in our abundant societies, we have reason enough to worry over the tensions that coil and tighten among underprivileged young people, and finally flail out in delinquency and crime. What are we to expect . . . where mounting frustrations are likely to fester into eruptions of violence and extremism?" In a seemingly unrelated passage, he continues: "It seems to me that we could move toward remedying that inequity [of the Selective Service System] by asking every young person in the United States to give two years of service to his country—whether in one of the military services, in the Peace Corps, or in some other volunteer developmental work at home or abroad. We could encourage other countries to do the same." Here, as elsewhere throughout this significant speech, Mr. McNamara has focused, indirectly but unmistakably, on one of the key issues bearing on a possible transition to peace, and has later indicated, also indirectly, a rough approach to its resolution, again phrased in the language of the current war system.

It seems clear that Mr. McNamara and other proponents of the peace-corps surrogate for this war function lean heavily on the success of the paramilitary Depression programs mentioned in the last section. We find the precedent wholly inadequate in degree. Neither the lack of relevant precedent, however, nor the dubious social-welfare

sentimentality characterizing this approach warrant its rejection without careful study. It may be viable—provided, first, that the military origin of the Corps format be effectively rendered out of its operational activity, and second, that the transition from paramilitary activities to “developmental work” can be effected without regard to the attitudes of the Corps personnel or to the “value” of the work it is expected to perform.

Another possible surrogate for the control of potential enemies of society is the reintroduction, in some form consistent with modern technology and political processes, of slavery. Up to now, this has been suggested only in fiction, notably in the works of Wells, Huxley, Orwell, and others engaged in the imaginative anticipation of the sociology of the future. But the fantasies projected in *Brave New World* and *1984* have seemed less and less implausible over the years since their publication. The traditional association of slavery with ancient preindustrial cultures should not blind us to its adaptability to advanced forms of social organization, nor should its equally traditional incompatibility with Western moral and economic values. It is entirely possible that the development of a sophisticated form of slavery may be an absolute prerequisite for social control in a world at peace. As a practical matter, conversion of the code of military discipline to a euphemized form of enslavement would entail surprisingly little revision; the logical first step would be the adoption of some form of “universal” military service.

When it comes to postulating a credible substitute for war capable of directing human behavior patterns in behalf of social organization, few options suggest themselves. Like its political function, the motivational function of war requires the existence of a genuinely menacing

social enemy. The principal difference is that for purposes of motivating basic allegiance, as distinct from accepting political authority, the “alternate enemy” must imply a more immediate, tangible, and directly felt threat of destruction. It must justify the need for taking and paying a “blood price” in wide areas of human concern.

In this respect, the possible substitute enemies noted earlier would be insufficient. One exception might be the environmental-pollution model, if the danger to society it posed was genuinely imminent. The fictive models would have to carry the weight of extraordinary conviction, underscored with a not inconsiderable actual sacrifice of life; the construction of an up-to-date mythological or religious structure for this purpose would present difficulties in our era, but must certainly be considered.

Games theorists have suggested, in other contexts, the development of “blood games” for the effective control of individual aggressive impulses. It is an ironic commentary on the current state of war and peace studies that it was left not to scientists but to the makers of a commercial film<sup>8</sup> to develop a model for this notion, on the implausible level of popular melodrama, as a ritualized manhunt. More realistically, such a ritual might be socialized, in the manner of the Spanish Inquisition and the less formal witch trials of other periods, for purposes of “social purification,” “state security,” or other rationale both acceptable and credible to postwar societies. The feasibility of such an updated version of still another ancient institution, though doubtful, is considerably less fanciful than the wishful notion of many peace planners that a lasting condition of peace can be brought about without the most painstaking examination of every possible surrogate for the essential

functions of war. What is involved here, in a sense, is the quest for William James's "moral equivalent of war."

It is also possible that the two functions considered under this heading may be jointly served, in the sense of establishing the antisocial, for whom a control institution is needed, as the "alternate enemy" needed to hold society together. The relentless and irreversible advance of unemployment at all levels of society, and the similar extension of generalized alienation from accepted values<sup>9</sup> may make some such program necessary even as an adjunct to the war system. As before, we will not speculate on the specific forms this kind of program might take, except to note that there is again ample precedent, in the treatment meted out to disfavored, allegedly menacing, ethnic groups in certain societies during certain historical periods.<sup>10</sup>

### *Ecological*

Considering the shortcomings of war as a mechanism of selective population control, it might appear that devising substitutes for this function should be comparatively simple. Schematically this is so, but the problem of timing the transition to a new ecological balancing device makes the feasibility of substitution less certain.

It must be remembered that the limitation of war in this function is entirely eugenic. War has not been genetically progressive. But as a system of gross population control to preserve the species it cannot fairly be faulted. And, as has been pointed out, the nature of war is itself in transition. Current trends in warfare—the increased strategic bombing of civilians and the greater military importance now attached to the destruction of sources of supply (as opposed to purely "military" bases and personnel)—strongly suggest that a truly qualitative improvement is in

the making. Assuming the war system is to continue, it is more than probable that the regressively selective quality of war will have been reversed, as its victims become more genetically representative of their societies.

There is no question but that a universal requirement that procreation be limited to the products of artificial insemination would provide a fully adequate substitute control for population levels. Such a reproductive system would, of course, have the added advantage of being susceptible of direct eugenic management. Its predictable further development—conception and embryonic growth taking place wholly under laboratory conditions—would extend these controls to their logical conclusion. The ecological function of war under these circumstances would not only be superseded but surpassed in effectiveness.

The indicated intermediate step—total control of conception with a variant of the ubiquitous "pill," via water supplies or certain essential foodstuffs, offset by a controlled "antidote"—is already under development.<sup>11</sup> There would appear to be no foreseeable need to revert to any of the outmoded practices referred to in the previous section (infanticide, etc.) as there might have been if the possibility of transition to peace had arisen two generations ago.

The real question here, therefore, does not concern the viability of this war substitute, but the political problems involved in bringing it about. It cannot be established while the war system is still in effect. The reason for this is simple: excess population is war material. As long as any society must contemplate even a remote possibility of war, it must maintain a maximum supportable population, even when so doing critically aggravates an economic liability. This is paradoxical, in view of war's role in reducing excess population, but it is readily understood. War con-

trols the *general* population level, but the ecological interest of any single society lies in maintaining its hegemony vis-à-vis other societies. The obvious analogy can be seen in any free-enterprise economy. Practices damaging to the society as a whole—both competitive and monopolistic—are abetted by the conflicting economic motives of individual capital interests. The obvious precedent can be found in the seemingly irrational political difficulties which have blocked universal adoption of simple birth-control methods. Nations desperately in need of increasing unfavorable production-consumption ratios are nevertheless unwilling to gamble their possible military requirements of twenty years hence for this purpose. Unilateral population control, as practiced in ancient Japan and in other isolated societies, is out of the question in today's world.

Since the eugenic solution cannot be achieved until the transition to the peace system takes place, why not wait? One must qualify the inclination to agree. As we noted earlier, a real possibility of an unprecedented global crisis of insufficiency exists today, which the war system may not be able to forestall. If this should come to pass before an agreed-upon transition to peace were completed, the result might be irrevocably disastrous. There is clearly no solution to this dilemma; it is a risk which must be taken. But it tends to support the view that if a decision is made to eliminate the war system, it were better done sooner than later.

#### *Cultural and Scientific*

Strictly speaking, the function of war as the determinant of cultural values and as the prime mover of scientific progress may not be critical in a world without war. Our criterion for the basic nonmilitary functions of war has

been: Are they necessary to the survival and stability of society? The absolute need for substitute cultural value-determinants and for the continued advance of scientific knowledge is not established. We believe it important, however, in behalf of those for whom these functions hold subjective significance, that it be known what they can reasonably expect in culture and science after a transition to peace.

So far as the creative arts are concerned, there is no reason to believe they would disappear, but only that they would change in character and relative social importance. The elimination of war would in due course deprive them of their principal conative force, but it would necessarily take some time for the effect of this withdrawal to be felt. During the transition, and perhaps for a generation thereafter, themes of sociomoral conflict inspired by the war system would be increasingly transferred to the idiom of purely personal sensibility. At the same time, a new aesthetic would have to develop. Whatever its name, form, or rationale, its function would be to express, in language appropriate to the new period, the once discredited philosophy that art exists for its own sake. This aesthetic would reject unequivocally the classic requirement of paramilitary conflict as the substantive content of great art. The eventual effect of the peace-world philosophy of art would be democratizing in the extreme, in the sense that a generally acknowledged subjectivity of artistic standards would equalize their new, content-free "values."

What may be expected to happen is that art would be reassigned the role it once played in a few primitive peace-oriented social systems. This was the function of pure decoration, entertainment, or play, entirely free of the burden of expressing the sociomoral values and conflicts of a war-



oriented society. It is interesting that the groundwork for such a value-free aesthetic is already being laid today, in growing experimentation in art without content, perhaps in anticipation of a world without conflict. A cult has developed around a new kind of cultural determinism,<sup>12</sup> which proposes that the technological form of a cultural expression determines its values rather than does its ostensibly meaningful content. Its clear implication is that there is no "good" or "bad" art, only that which is appropriate to its (technological) times and that which is not. Its cultural effect has been to promote circumstantial constructions and unplanned expressions; it denies to art the relevance of sequential logic. Its significance in this context is that it provides a working model of one kind of value-free culture we might reasonably anticipate in a world at peace.

So far as science is concerned, it might appear at first glance that a giant space-research program, the most promising among the proposed economic surrogates for war, might also serve as the basic stimulator of scientific research. The lack of fundamental organized social conflict inherent in space work, however, would rule it out as an adequate motivational substitute for war when applied to "pure" science. But it could no doubt sustain the broad range of *technological* activity that a space budget of military dimensions would require. A similarly scaled social-welfare program could provide a comparable impetus to low-keyed technological advances, especially in medicine, rationalized construction methods, educational psychology, etc. The eugenic substitute for the ecological function of war would also require continuing research in certain areas of the life sciences.

Apart from these partial substitutes for war, it must be

kept in mind that the momentum given to scientific progress by the great wars of the past century, and even more by the anticipation of World War III, is intellectually and materially enormous. It is our finding that if the war system were to end tomorrow this momentum is so great that the pursuit of scientific knowledge could reasonably be expected to go forward without noticeable diminution for perhaps two decades.<sup>13</sup> It would then continue, at a progressively decreasing tempo, for at least another two decades before the "bank account" of today's unresolved problems would become exhausted. By the standards of the questions we have learned to ask today, there would no longer be anything worth knowing still unknown; we cannot conceive, by definition, of the scientific questions to ask once those we can now comprehend are answered.

This leads unavoidably to another matter: the intrinsic value of the unlimited search for knowledge. We of course offer no independent value judgments here, but it is germane to point out that a substantial minority of scientific opinion feels that search to be circumscribed in any case. This opinion is itself a factor in considering the need for a substitute for the scientific function of war. For the record, we must also take note of the precedent that during long periods of human history, often covering thousands of years, in which no intrinsic social value was assigned to scientific progress, stable societies did survive and flourish. Although this could not have been possible in the modern industrial world, we cannot be certain it may not again be true in a future world at peace.

SECTION 7

SUMMARY AND  
CONCLUSIONS

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*The Nature of War*

WAR IS NOT, as is widely assumed, primarily an instrument of policy utilized by nations to extend or defend their expressed political values or their economic interests. On the contrary, it is itself the principal basis of organization on which all modern societies are constructed. The common proximate cause of war is the apparent interference of one nation with the aspirations of another. But at the root of all ostensible differences of national interest lie the dynamic requirements of the war system itself for periodic armed conflict. Readiness for war characterizes contemporary social systems more broadly than their economic and political structures, which it subsumes.

Economic analyses of the anticipated problems of transition to peace have not recognized the broad preeminence of war in the definition of social systems. The same is true, with rare and only partial exceptions, of model disarmament "scenarios." For this reason, the value of this previous work is limited to the mechanical aspects of transition. Certain features of these models may perhaps be applicable to a real situation of conversion to peace; this will depend on their compatibility with a substantive, rather than a procedural, peace plan. Such a plan can be developed only from the premise of full understanding of the

nature of the war system it proposes to abolish, which in turn presupposes detailed comprehension of the functions the war system performs for society. It will require the construction of a detailed and feasible system of substitutes for those functions that are necessary to the stability and survival of human societies.

### *The Functions of War*

The visible, military function of war requires no elucidation; it is not only obvious but also irrelevant to a transition to the condition of peace, in which it will by definition be superfluous. It is also subsidiary in social significance to the implied, nonmilitary functions of war; those critical to transition can be summarized in five principal groupings.

1. *Economic.* War has provided both ancient and modern societies with a dependable system for stabilizing and controlling national economies. No alternate method of control has yet been tested in a complex modern economy that has shown itself remotely comparable in scope or effectiveness.

2. *Political.* The permanent possibility of war is the foundation for stable government; it supplies the basis for general acceptance of political authority. It has enabled societies to maintain necessary class distinctions, and it has ensured the subordination of the citizen to the state, by virtue of the residual war powers inherent in the concept of nationhood. No modern political ruling group has successfully controlled its constituency after failing to sustain the continuing credibility of an external threat of war.

3. *Sociological.* War, through the medium of military institutions, has uniquely served societies, throughout the course of known history, as an indispensable controller of dangerous social dissidence and destructive antisocial ten-

dencies. As the most formidable of threats to life itself, and as the only one susceptible to mitigation by social organization alone, it has played another equally fundamental role: the war system has provided the machinery through which the motivational forces governing human behavior have been translated into binding social allegiance. It has thus ensured the degree of social cohesion necessary to the viability of nations. No other institution, or groups of institutions, in modern societies, has successfully served these functions.

4. *Ecological.* War has been the principal evolutionary device for maintaining a satisfactory ecological balance between gross human population and supplies available for its survival. It is unique to the human species.

5. *Cultural and Scientific.* War-orientation has determined the basic standards of value in the creative arts, and has provided the fundamental motivational source of scientific and technological progress. The concepts that the arts express values independent of their own forms and that the successful pursuit of knowledge has intrinsic social value have long been accepted in modern societies; the development of the arts and sciences during this period has been corollary to the parallel development of weaponry.

### *Substitutes for the Functions of War: Criteria*

The foregoing functions of war are essential to the survival of the social systems we know today. With two possible exceptions they are also essential to any kind of stable social organization that might survive in a warless world. Discussion of the ways and means of transition to such a world are meaningless unless a) substitute institutions can be devised to fill these functions, or b) it can reasonably be

hypothecated that the loss or partial loss of any one function need not destroy the viability of future societies.

Such substitute institutions and hypotheses must meet varying criteria. In general, they must be technically feasible, politically acceptable, and potentially credible to the members of the societies that adopt them. Specifically, they must be characterized as follows:

1. *Economic.* An acceptable economic surrogate for the war system will require the expenditure of resources for completely nonproductive purposes at a level comparable to that of the military expenditures otherwise demanded by the size and complexity of each society. Such a substitute system of apparent "waste" must be of a nature that will permit it to remain independent of the normal supply-demand economy; it must be subject to arbitrary political control.

2. *Political.* A viable political substitute for war must posit a generalized external menace to each society of a nature and degree sufficient to require the organization and acceptance of political authority.

3. *Sociological.* First, in the permanent absence of war, new institutions must be developed that will effectively control the socially destructive segments of societies. Second, for purposes of adapting the physical and psychological dynamics of human behavior to the needs of social organization, a credible substitute for war must generate an omnipresent and readily understood fear of personal destruction. This fear must be of a nature and degree sufficient to ensure adherence to societal values to the full extent that they are acknowledged to transcend the value of individual human life.

4. *Ecological.* A substitute for war in its function as the uniquely human system of population control must ensure

the survival, if not necessarily the improvement, of the species, in terms of its relation to environmental supply.

5. *Cultural and Scientific.* A surrogate for the function of war as the determinant of cultural values must establish a basis of sociomoral conflict of equally compelling force and scope. A substitute motivational basis for the quest for scientific knowledge must be similarly informed by a comparable sense of internal necessity.

#### *Substitutes for the Functions of War: Models*

The following substitute institutions, among others, have been proposed for consideration as replacements for the nonmilitary functions of war. That they may not have been originally set forth for that purpose does not preclude or invalidate their possible application here.

1. *Economic.* (a) A comprehensive social-welfare program, directed toward maximum improvement of general conditions of human life. (b) A giant open-end space-research program, aimed at unreachable targets. (c) A permanent, ritualized, ultra-elaborate disarmament inspection system, and variants of such a system.

2. *Political.* (a) An omnipresent, virtually omnipotent international police force. (b) An established and recognized extraterrestrial menace. (c) Massive global environmental pollution. (d) Fictitious alternate enemies.

3. *Sociological: Control function.* (a) Programs generally derived from the Peace Corps model. (b) A modern, sophisticated form of slavery. *Motivational function.* (a) Intensified environmental pollution. (b) New religions or other mythologies. (c) Socially oriented blood games. (d) Combination forms.

4. *Ecological.* A comprehensive program of applied eugenics.

5. *Cultural.* No replacement institution offered. *Scientific.* The secondary requirements of the space-research, social-welfare, and/or eugenics programs.

***Substitutes for the Functions of War: Evaluation***

The models listed above reflect only the beginning of the quest for substitute institutions for the functions of war, rather than a recapitulation of alternatives. It would be both premature and inappropriate, therefore, to offer final judgments on their applicability to a transition to peace and after. Furthermore, since the necessary but complex project of correlating the compatibility of proposed surrogates for different functions could be treated only in exemplary fashion at this time, we have elected to withhold such hypothetical correlations as were tested as statistically inadequate.<sup>1</sup>

Nevertheless, some tentative and cursory comments on these proposed functional "solutions" will indicate the scope of the difficulties involved in this area of peace planning.

*Economic.* The social-welfare model cannot be expected to remain outside the normal economy after the conclusion of its predominantly capital-investment phase; its value in this function can therefore be only temporary. The space-research substitute appears to meet both major criteria, and should be examined in greater detail, especially in respect to its probable effects on other war functions. "Elaborate inspection" schemes, although superficially attractive, are inconsistent with the basic premise of transition to peace. The "unarmed forces" variant, logistically similar, is subject to the same functional criticism as the general social-welfare model.

*Political.* Like the inspection-scheme surrogates, pro-

posals for plenipotentiary international police are inherently incompatible with the ending of the war system. The "unarmed forces" variant, amended to include unlimited powers of economic sanction, might conceivably be expanded to constitute a credible external menace. Development of an acceptable threat from "outer space," presumably in conjunction with a space-research surrogate for economic control, appears unpromising in terms of credibility. The environmental-pollution model does not seem sufficiently responsive to immediate social control, except through arbitrary acceleration of current pollution trends; this in turn raises questions of political acceptability. New, less regressive, approaches to the creation of fictitious global "enemies" invite further investigation.

*Sociological: Control function.* Although the various substitutes proposed for this function that are modeled roughly on the Peace Corps appear grossly inadequate in potential scope, they should not be ruled out without further study. Slavery, in a technologically modern and conceptually euphemized form, may prove a more efficient and flexible institution in this area. *Motivational function.* Although none of the proposed substitutes for war as the guarantor of social allegiance can be dismissed out of hand, each presents serious and special difficulties. Intensified environmental threats may raise ecological dangers; mythmaking dissociated from war may no longer be politically feasible; purposeful blood games and rituals can far more readily be devised than implemented. An institution combining this function with the preceding one, based on, but not necessarily imitative of, the precedent of organized ethnic repression, warrants careful consideration.

*Ecological.* The only apparent problem in the application of an adequate eugenic substitute for war is that of

timing; it cannot be effectuated until the transition to peace has been completed, which involves a serious temporary risk of ecological failure.

*Cultural.* No plausible substitute for this function of war has yet been proposed. It may be, however, that a basic cultural value-determinant is not necessary to the survival of a stable society. *Scientific.* The same might be said for the function of war as the prime mover of the search for knowledge. However, adoption of either a giant space-research program, a comprehensive social-welfare program, or a master program of eugenic control would provide motivation for limited technologies.

#### *General Conclusions*

It is apparent, from the foregoing, that no program or combination of programs yet proposed for a transition to peace has remotely approached meeting the comprehensive functional requirements of a world without war. Although one projected system for filling the economic function of war seems promising, similar optimism cannot be expressed in the equally essential political and sociological areas. The other major nonmilitary functions of war—ecological, cultural, scientific—raise very different problems, but it is at least possible that detailed programming of substitutes in these areas is not prerequisite to transition. More important, it is not enough to develop adequate but separate surrogates for the major war functions; they must be fully compatible and in no degree self-canceling.

Until such a unified program is developed, at least hypothetically, it is impossible for this or any other group to furnish meaningful answers to the questions originally presented to us. When asked how best to prepare for the advent of peace, we must first reply, as strongly as we can,

that the war system cannot responsibly be allowed to disappear until 1) we know exactly what it is we plan to put in its place, and 2) we are certain, beyond reasonable doubt, that these substitute institutions will serve their purposes in terms of the survival and stability of society. It will then be time enough to develop methods for effectuating the transition; procedural programming must follow, not precede, substantive solutions.

Such solutions, if indeed they exist, will not be arrived at without a revolutionary revision of the modes of thought heretofore considered appropriate to peace research. That we have examined the fundamental questions involved from a dispassionate, value-free point of view should not imply that we do not appreciate the intellectual and emotional difficulties that must be overcome on all decision-making levels before these questions are generally acknowledged by others for what they are. They reflect, on an intellectual level, traditional emotional resistance to new (more lethal and thus more "shocking") forms of weaponry. The understated comment of then-Senator Hubert Humphrey on the publication of *On Thermonuclear War* is still very much to the point: "New thoughts, particularly those which appear to contradict current assumptions, are always painful for the mind to contemplate."

Nor, simply because we have not discussed them, do we minimize the massive reconciliation of conflicting interests which domestic as well as international agreement on proceeding toward genuine peace presupposes. This factor was excluded from the purview of our assignment, but we would be remiss if we failed to take it into account. Although no insuperable obstacle lies in the path of reaching such general agreements, formidable short-

term private-group and general-class interest in maintaining the war system is well established and widely recognized. The resistance to peace stemming from such interest is only tangential, in the long run, to the basic functions of war, but it will not be easily overcome, in this country or elsewhere. Some observers, in fact, believe that it cannot be overcome at all in our time, that the price of peace is, simply, too high. This bears on our overall conclusions to the extent that timing in the transference to substitute institutions may often be the critical factor in their political feasibility.

It is uncertain, at this time, whether peace will ever be possible. It is far more questionable, by the objective standard of continued social survival rather than that of emotional pacifism, that it would be desirable even if it were demonstrably attainable. The war system, for all its subjective repugnance to important sections of "public opinion," has demonstrated its effectiveness since the beginning of recorded history; it has provided the basis for the development of many impressively durable civilizations, including that which is dominant today. It has consistently provided unambiguous social priorities. It is, on the whole, a known quantity. A viable system of peace, assuming that the great and complex questions of substitute institutions raised in this Report are both soluble and solved, would still constitute a venture into the unknown, with the inevitable risks attendant on the unforeseen, however small and however well hedged.

Government decision-makers tend to choose peace over war whenever a real option exists, because it usually appears to be the "safer" choice. Under most immediate circumstances they are likely to be right. But in terms of long-range social stability, the opposite is true. At our

present state of knowledge and reasonable inference, it is the war system that must be identified with stability, the peace system with social speculation, however justifiable the speculation may appear, in terms of subjective moral or emotional values. A nuclear physicist once remarked, in respect to a possible disarmament agreement: "If we could change the world into a world in which no weapons could be made, that would be stabilizing. But agreements we can expect with the Soviets would be destabilizing."<sup>2</sup> The qualification and the bias are equally irrelevant; *any* condition of genuine total peace, however achieved, would be destabilizing until proved otherwise.

If it were necessary at this moment to opt irrevocably for the retention or for the dissolution of the war system, common prudence would dictate the former course. But it is not yet necessary, late as the hour appears. And more factors must eventually enter the war-peace equation than even the most determined search for alternative institutions for the functions of war can be expected to reveal. One group of such factors has been given only passing mention in this Report; it centers around the possible obsolescence of the war system itself. We have noted, for instance, the limitations of the war system in filling its ecological function and the declining importance of this aspect of war. It by no means stretches the imagination to visualize comparable developments which may compromise the efficacy of war as, for example, an economic controller or as an organizer of social allegiance. This kind of possibility, however remote, serves as a reminder that all calculations of contingency not only involve the weighing of one group of risks against another, but require a respectful allowance for error on both sides of the scale.

A more expedient reason for pursuing the investigation

of alternate ways and means to serve the current functions of war is narrowly political. It is possible that one or more major sovereign nations may arrive, through ambiguous leadership, at a position in which a ruling administrative class may lose control of basic public opinion or of its ability to rationalize a desired war. It is not hard to imagine, in such circumstance, a situation in which such governments may feel forced to initiate serious full-scale disarmament proceedings (perhaps provoked by "accidental" nuclear explosions), and that such negotiations may lead to the actual disestablishment of military institutions. As our Report has made clear, this could be catastrophic. It seems evident that, in the event an important part of the world is suddenly plunged without sufficient warning into an inadvertent peace, even partial and inadequate preparation for the possibility may be better than none. The difference could even be critical. The models considered in the preceding chapter, both those that seem promising and those that do not, have one positive feature in common—an inherent flexibility of phasing. And despite our strictures against knowingly proceeding into peace-transition procedures without thorough substantive preparation, our government must nevertheless be ready to move in this direction with whatever limited resources of planning are on hand at the time—if circumstances so require. An arbitrary all-or-nothing approach is no more realistic in the development of contingency peace programming than it is anywhere else.

But the principal cause for concern over the continuing effectiveness of the war system, and the more important reason for hedging with peace planning, lies in the backwardness of current war-system programming. Its controls have not kept pace with the technological advances it has

made possible. Despite its unarguable success to date, even in this era of unprecedented potential in mass destruction, it continues to operate largely on a laissez-faire basis. To the best of our knowledge, no serious quantified studies have ever been conducted to determine, for example:

- optimum levels of armament production, for purposes of economic control, at any given series of chronological points and under any given relationship between civilian production and consumption patterns;
- correlation factors between draft recruitment policies and mensurable social dissidence;
- minimum levels of population destruction necessary to maintain war-threat credibility under varying political conditions;
- optimum cyclical frequency of "shooting" wars under varying circumstances of historical relationship.

These and other war-function factors are fully susceptible to analysis by today's computer-based systems,<sup>3</sup> but they have not been so treated; modern analytical techniques have up to now been relegated to such aspects of the ostensible functions of war as procurement, personnel deployment, weapons analysis, and the like. We do not disparage these types of application, but only deplore their lack of utilization to greater capacity in attacking problems of broader scope. Our concern for efficiency in this context is not aesthetic, economic, or humanistic. It stems from the axiom that no system can long survive at either input or output levels that consistently or substan-



tially deviate from an optimum range. As their data grow increasingly sophisticated, the war system and its functions are increasingly endangered by such deviations.

Our final conclusion, therefore, is that it will be necessary for our government to plan in depth for two general contingencies. The first, and lesser, is the possibility of a viable general peace; the second is the successful continuation of the war system. In our view, careful preparation for the possibility of peace should be extended, not because we take the position that the end of war would necessarily be desirable, if it is in fact possible, but because it may be thrust upon us in some form whether we are ready for it or not. Planning for rationalizing and quantifying the war system, on the other hand, to ensure the effectiveness of its major stabilizing functions, is not only more promising in respect to anticipated results, but is essential; we can no longer take for granted that it will continue to serve our purposes well merely because it always has. The objective of government policy in regard to war and peace, in this period of uncertainty, must be to preserve maximum options. The recommendations which follow are directed to this end.

## RECOMMENDATIONS

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(1) We propose the establishment, under executive order of the President, of a permanent War/Peace Research Agency, empowered and mandated to execute the programs described in (2) and (3) below. This agency (a) will be provided with nonaccountable funds sufficient to implement its responsibilities and decisions at its own discretion, and (b) will have authority to preempt and utilize, without restriction, any and all facilities of the executive branch of the government in pursuit of its objectives. It will be organized along the lines of the National Security Council, except that none of its governing, executive, or operating personnel will hold other public office or governmental responsibility. Its directorate will be drawn from the broadest practicable spectrum of scientific disciplines, humanistic studies, applied creative arts, operating technologies, and otherwise unclassified professional occupations. It will be responsible solely to the President, or to other officers of government temporarily deputized by him. Its operations will be governed entirely by its own rules of procedure. Its authority will expressly include the unlimited right to withhold information on its activities and its decisions, from anyone except the President, whenever it deems such secrecy to be in the public interest.

(2) THE FIRST OF THE WAR/PEACE RESEARCH AGENCY'S two principal responsibilities will be to determine all that can

# Exhibit L

**MEGHAN MARIE KELLY, ESQUIRE**

.....  
34012 Shawnee Drive  
Dagsboro, DE 19939

July 21, 2021

**RE: Elimination of the Dollar/ Intentionally crashing the economy to get out of the biggest bill falling due, caring for the Baby Boomers**

Dear Honorable Justices of the Delaware Supreme Court:

I write to alert you of a plan to eliminate the dollar, and intentionally crash the economy.

Governor Carney's order for businesses to take paper cash, may no longer be in effect with the lifting of the Governor's emergency. Walmart is not giving coins as change back which aligns with the schemes by the founder of the world economic forum.

I seek mercy not sacrifice in order to prevent or reverse this economic crash. The hands that may have the power to prevent or reverse a global economic crash may be unclean. Yet, it is not too late for them to clean their own hands in order to clean the hands that may destroy the union of this United States. Chief Justice Roberts' wife and Justice Thomas's wife appear to be involved in politicking potentially with churches that use government-religion to persuade government positions.

Our Attorney General may also be backed by churches which is of concern. I believe the executive orders I seek to enjoin President Biden

from enforcing are part of a greater step to eliminate social security and Medicare to privatize it for profit, not for charity or good.

The attached two books which I will drop off to the Honorable Chief Flood of Dagsboro speak of eliminating governments, making everyone and everything for sale by those who do not earn, but take it. While, this may be beyond the scope of my case, it touches the concerns the Attorney General may choose to alleviate or prevent. I care about preserving the union of these United States of America, and believe the Chancery court may be the only court to protect it, even beyond my case.

I separately, copied the pages with notes for the Chief of police, the Honorable Chief Flood, and intend to drop off a copy, a physical copy for this honorable court. That way, this Court will not have to scan everything all over again, if you reject electronic files. You merely will have to scan the first page.

Thank you for your kind consideration.

Dated: July 21, 2021

Respectfully submitted,

/s/Meghan Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
(Word Count 407)

# Exhibit M

U.S. COURT OF APPEALS, THIRD CIRCUIT

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

**Appellant Plaintiff Meghan Kelly’s Motion, for good cause, for additional time to draft the reply brief and to grant opposing counsel additional time to be fair**

I, Appellant, Plaintiff Meghan Kelly pursuant, for good cause pursuant to Federal Rules of Appellate Procedure Rule 26 (b) move the Court for additional time it seems just to file a reply Brief in the amount of 45 days, and to grant opposing counsel a similar amount of time in the amount of 45 days to draft a brief in response to my brief to vacate the District order dismissing my case .

1. FRAP R. 26(b) provides: “For good cause, the court may extend the time prescribed by these rules or by its order to perform any act, or may permit an act to be done after that time expires.

2. On October 22, 2022, I filed Appellant Plaintiff Meghan Kelly’s Opening Brief moving the Third Circuit Court of Appeals to vacate the Delaware District Orders (DI 16-17, 30-31, 59-60), and to remand the matter to the Delaware District Court for consideration.

3. I have not started my US Supreme Court Brief which is due in less than 45 days.

4. My transportation, my bike got a flat tire. I was compelled to go to the DMV and place my tags on my vehicle. So I am not stranded. (Please see Exhibit B, which is located as DI 96-11 for pictures of my bike's flat tire and medical exhibit, which is not confidential)

5. I am facing economic hardship. I seek grace as I find a way to afford to respond to reciprocating law suits, while not waiving my right to be heard.

6. I face time limitations, and health limitations due to surgery I had as a teenager. (See, DI 4, Exhibit 43, which is the same as Exhibit B). I certainly do not want to risk death as I seek to safeguard my eternal soul by protecting my free exercise of religious beliefs without a government compelled substantial burdens tempting me to bend my will to the dictates of money or the government.

7. I am a Christian. I believe Jesus. Jesus said you cannot serve God and money. I choose God. I believe people lose eternal life by seeking security in money as their savior God and guide to care for their family, and themselves. I keep myself separate. God commands me to be holy. I believe that means not committing adultery by making money or a profession or man or man-made training guide and God.

8. I have strong beliefs. My beliefs are genuine. The Delaware Supreme Court seeks to compel me to violate my religious beliefs 1. Refusing to exempt me from the affirming or swearing in requirements, 2. compelling me to exchange my free exercise of religion for a license to make money as an attorney, 3. Compelling me to exchange my exercise of free speech, belief, exercise of belief, association, and property interest in my license to the forced dictates of the state under the threat of punishment for using my own free will, and not conditional, conformed controlled will of the government or government backed private or foreign partners.

9. I have much to lose, and will lose everything if I am not afforded an opportunity to be heard to appeal the original Delaware Disciplinary proceeding before the US Supreme Court.

10. I have been fighting for my eternal soul in these two federal courts incessantly. You could use a break from me. I desire to just cry at the injustices I have experienced, and to have enough time to get a good's night rest.

11. I am scared. I do not want to be compelled to violate my religious beliefs in order to practice law. I should not be tempted to sin against God and be damned to hell in order to buy and sell.

12. I beg you for time, an opportunity to draft a brief before the US Supreme Court by extending any reply due in the amount of 45 days. There is no



Case: 21-3198 Document: 99-1 Page: 4 Date Filed: 10/22/2022

guarantee I will be heard, it is the opportunity for an open court for peons, the poor, those with repugnant beliefs, the least of these, for me I seek to preserve the opportunity for.

Wherefore, I pray this Court grants this motion.

Respectfully submitted,

Dated October 22, 2022

/s/Meghan Kelly

---

Meghan Kelly, Esquire  
DE Bar Number 4968  
INACTIVE, not acting as an  
attorney on behalf of another  
34012 Shawnee Drive  
Dagsboro, DE 19939  
(302) 493-6693  
[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)

# Exhibit N

Case: 21-3198 Document: 100 Page: 1 Date Filed: 10/24/2022

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

CCO-006

Nos. 21-3198 & 22-2079

MEGHAN M. KELLY,  
Appellant

v.

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

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

Present: PHIPPS, Circuit Judge

1. Appellant's Motion for 30-Day Extension of Time to File Brief, which the Court may wish to construe as a Motion to File the Opening Brief Out of Time [received on October 20, 2022];
2. Appellant's Corrected Motion for 30-Day Extension of Time to File Brief, which the Court may wish to construe as a Motion to File the Opening Brief Out of Time [received on October 21, 2022];
3. Appellant's Untimely Opening Brief [received on October 22, 2022];
4. Appellant's Motion to Extend Remaining Briefing Deadlines: Response Brief Due within 45 Days, and Reply Brief Due 45 Days Thereafter [received on October 22, 2022].

Respectfully,  
Clerk/pdb

ORDER

The foregoing Appellant's Motion for 30-Day Extension of Time to File Brief, which may be construed as a Motion to File the Opening Brief Out of Time, and Appellant's Corrected Motion for 30-Day Extension of Time to File Brief, which may be construed as

Case: 21-3198 Document: 100 Page: 2 Date Filed: 10/24/2022

a Motion to File the Opening Brief Out of Time, are granted, such that Appellant's opening brief, which was filed on October 22, 2022, is deemed timely. These two motions are denied in all other respects.

Appellant's Motion to Extend Remaining Briefing Deadlines: Response Brief Due within 45 Days, and Reply Brief Due 45 Days Thereafter is denied, without prejudice, as it is premature. Appellant may renew her motion for an extension of time to file her reply brief after Appellees file their responsive brief if, at that time, Appellant continues to believe an extension of time to file her reply is necessary.

By the Court,

s/ Peter J. Phipps  
Circuit Judge

Dated: October 24, 2022  
PDB/cc: Meghan M. Kelly, Esq.  
Zi-Xiang Shen, Esq.

# Exhibit O

PACER fee: Exempt Court Order Change

**General Docket  
Third Circuit Court of Appeals**

|   |                                 |                             |              |
|---|---------------------------------|-----------------------------|--------------|
| <b>Court of Appeals Docket #: 21-3198</b>                                     |                                 | <b>Docketed: 11/30/2021</b> |              |
| <b>Nature of Suit: 3440 Other Civil Rights</b>                                |                                 |                             |              |
| <b>Meghan Kelly v. Patricia Swartz, et al</b>                                 |                                 |                             |              |
| <b>Appeal From: United States District Court for the District of Delaware</b> |                                 |                             |              |
| <b>Fee Status: IFP</b>  |                                 |                             |              |
| <b>Case Type Information:</b>   |                                 |                             |              |
| 1) civil  |                                 |                             |              |
| 2) private  |                                 |                             |              |
| 3) civil rights   |                                 |                             |              |
| <b>Originating Court Information:</b>   |                                 |                             |              |
| <b>District: 0311-1 : 1-21-cv-01490</b>                                       |                                 |                             |              |
| <b>Trial Judge: Colm F. Connolly, District Judge</b>                          |                                 |                             |              |
| <b>Date Filed: 10/25/2021</b>   |                                 |                             |              |
| <b>Date Order/Judgment:</b>   | <b>Date Order/Judgment EOD:</b> | <b>Date NOA Filed:</b>      |              |
| 11/02/2021  | 11/02/2021                      | 11/24/2021                  |              |
| <b>Prior Cases:</b>   |                                 |                             |              |
| None  |                                 |                             |              |
| <b>Current Cases:</b>   |                                 |                             |              |
|   | <b>Lead</b>                     | <b>Member</b>               | <b>Start</b> |
| joined  |                                 |                             | <b>End</b>   |
|   | 21-3198                         | <u>22-2079</u>              | 06/07/2022   |

|  |   |
|--|---|
| <p><b>MEGHAN M. KELLY</b><br/>Plaintiff - Appellant</p> <p>v.</p> <p><b>DISCIPLINARY COUNSEL PATRICIA B. SWARTZ</b><br/>Defendant - Appellee</p> <p><b>DISCIPLINARY COUNSEL KATHLEEN M. VAVALA</b><br/>Defendant - Appellee</p> <p><b>DAVID A. WHITE, Chief Disciplinary Counsel</b><br/>Defendant - Appellee</p> <p><b>OFFICE DISCIPLINARY COUNSEL</b><br/>Defendant - Appellee</p> <p><b>BOARD ON PROFESSIONAL RESPONSIBILITY OF THE SUPREME COURT OF THE STATE OF DELAWARE</b><br/>Defendant - Appellee</p> | <p>Meghan M. Kelly, Esq.<br/>Direct: 302-493-6693<br/>Email: meghankellyesq@yahoo.com<br/>[NTC Pro Se Atty]<br/>34012 Shawnee Drive<br/>Dagsboro, DE 19939</p> <p>Zi-Xiang Shen, Esq.<br/>Direct: 302-577-8400<br/>Email: Zi-Xiang.Shen@delaware.gov<br/>[COR NTC State Government]<br/>Office of Attorney General of Delaware<br/>Delaware Department of Justice<br/>820 North French Street<br/>Carvel Office Building<br/>Wilmington, DE 19801</p> <p>Zi-Xiang Shen, Esq.<br/>Direct: 302-577-8400<br/>[COR NTC State Government]<br/>(see above)</p> <p>Zi-Xiang Shen, Esq.<br/>Direct: 302-577-8400<br/>[COR NTC State Government]<br/>(see above)</p> <p>Zi-Xiang Shen, Esq.<br/>Direct: 302-577-8400<br/>[COR NTC State Government]<br/>(see above)</p> <p>Zi-Xiang Shen, Esq.<br/>Direct: 302-577-8400<br/>[COR NTC State Government]</p> |
|--|---|


|  |   |
|--|---|
| <p><b>PRELIMINARY INVESTIGATORY COMMITTEE</b><br/> <b>Defendant - Appellee</b></p> | <p>(see above)<br/>         Zi-Xiang Shen, Esq.<br/>         Direct: 302-577-8400<br/>         [COR NTC State Government]<br/>         (see above)</p>  |
| <p><b>ATTORNEY GENERAL DELAWARE</b><br/> <b>Defendant - Appellee</b></p>           | <p>Attorney General Delaware<br/>         [State Government]<br/>         Office of Attorney General of Delaware<br/>         Delaware Department of Justice<br/>         820 North French Street<br/>         Carvel Office Building<br/>         Wilmington, DE 19801<br/> <br/>         Zi-Xiang Shen, Esq.<br/>         Direct: 302-577-8400<br/>         [COR NTC State Government]<br/>         (see above)</p> |


MEGHAN M. KELLY,  
Appellant

v.

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



|            |  |  |
|------------|--|--|
| 11/30/2021 | <input type="checkbox"/> <u>1</u><br>19 pg, 1.8 MB   | CIVIL CASE DOCKETED. Notice filed by Appellant Meghan M. Kelly in District Court No. 1-21-cv-01490. (PDB) [Entered: 11/30/2021 05:12 PM]   |
| 11/30/2021 | <input type="checkbox"/> <u>2</u>  | RECORD available on District Court CM/ECF. (PDB) [Entered: 11/30/2021 05:17 PM]  |
| 11/30/2021 | <input type="checkbox"/> <u>3</u><br>9 pg, 417.12 KB   | Duplicate Notice of Appeal Filed Directly in Court of Appeals. (PDB) [Entered: 11/30/2021 05:22 PM]  |
| 11/30/2021 | <input type="checkbox"/> <u>4</u><br>1 pg, 169.21 KB   | CLERK ORDER - RULE 4(a)(4) staying case pending disposition of post decision motion(s). (PDB) [Entered: 11/30/2021 05:22 PM]   |
| 12/08/2021 | <input type="checkbox"/> <u>5</u><br>6 pg, 2.87 MB   | TRANSCRIPT PURCHASE ORDER FORM (Part 1). No proceedings in District Court. (PDB) [Entered: 12/10/2021 02:35 PM]  |
| 12/08/2021 | <input type="checkbox"/> <u>6</u> <br>79 pg, 12.08 MB | MOTION filed by Appellant Meghan M. Kelly to Proceed In Forma Pauperis. Certificate of Service dated 12/10/2021. Service made by ECF. (PDB) [Entered: 12/10/2021 05:44 PM]   |
| 12/08/2021 | <input type="checkbox"/> <u>7</u><br>3 pg, 1.04 MB   | CIVIL INFORMATION STATEMENT on behalf of Appellant Meghan M. Kelly, received. (PDB) [Entered: 12/10/2021 05:45 PM]   |
| 12/08/2021 | <input type="checkbox"/> <u>8</u><br>3 pg, 536.63 KB   | DISCLOSURE STATEMENT filed on behalf of Appellant Meghan M. Kelly. (PDB) [Entered: 12/10/2021 05:45 PM]  |
| 12/09/2021 | <input type="checkbox"/> <u>9</u><br>11 pg, 487.89 KB  | CONCISE SUMMARY OF THE CASE on behalf of Appellant Meghan M. Kelly, received. (PDB) [Entered: 12/10/2021 06:02 PM]   |
| 12/09/2021 | <input type="checkbox"/> <u>10</u><br>5 pg, 270.54 KB  | MOTION filed by Appellant Meghan M. Kelly to Amend Case Caption. Certificate of Service dated 12/08/2021. Service made by US mail--[Edited 12/14/2021 by KR] (PDB) [Entered: 12/10/2021 06:03 PM]  |
| 12/09/2021 | <input type="checkbox"/> <u>11</u><br>15 pg, 616.56 KB   | MOTION filed by Appellant Meghan M. Kelly for Permission to E-File Through Public Access to Court Electronic Records (Pacer) Exemption of Pacer Fees, and a Waiver of the additional Paper Copy Requirement for Electronic Filed Pleadings. Certificate of Service dated 12/08/2021. Service made by US mail. (PDB) [Entered: 12/10/2021 06:09 PM]   |
| 12/09/2021 | <input type="checkbox"/> <u>12</u>   | EXHIBIT(S) [CD] on behalf of Appellant Meghan M. Kelly. Copies: 1. (GPK) [Entered: 12/14/2021 10:28 AM]  |
| 12/14/2021 | <input type="checkbox"/> <u>13</u><br>6 pg, 133.15 KB  | Letter from Appellant for the Court's Information, construed as a Motion to Lodge Exhibits in CD form--[Edited 12/20/2021 by PDB] (KR) [Entered: 12/14/2021 03:22 PM]  |
| 12/20/2021 | <input type="checkbox"/> <u>14</u><br>2 pg, 100.69 KB  | ORDER (Clerk) The foregoing motion to amend the caption is hereby considered and denied. Because Defendant Delaware Attorney General Kathleen Jennings was sued in her official capacity only, she has been added to the case and caption in only that capacity as Delaware Attorney General, not by name. No action will be taken on Appellant's motion to file electronically through PACER. As an attorney, Appellant must file electronically. See L.A.R. Misc. 113.1(a) & (e). Appellant can register as a pro se e-filer and does not need the Court's permission to do so. If Appellant wishes to opt out of electronic filing, she must file a motion requesting such relief. See 3d Cir. L.A.R. Misc. 113.2(a). Once Appellant registers as an e-filer she will be able to access one free copy of all future filings. Accordingly, no action will be taken on Appellant's request to waive PACER fees. Appellant's motion to waive the paper copy requirement is granted, in part. The Court does not require paper copies of motions, pleadings, petitions, or other documents, but generally requires hard copies of briefs. (See Order for Full Text). (PDB) [Entered: 12/20/2021 09:48 AM] |
| 12/20/2021 | <input type="checkbox"/> <u>15</u><br>2 pg, 105.8 KB   | FOLLOW UP LETTER to Attorney General Delaware for Attorney General Delaware requesting the following document(s): Appearance Form on or before 01/03/2022. (PDB) [Entered: 12/20/2021 09:52 AM]  |
| 12/22/2021 | <input type="checkbox"/> <u>16</u><br>1 pg, 173.46 KB  | COPY OF OPINION/ORDER OF DISTRICT COURT dated 12/22/2022 Denying motion for reconsideration, granting motion for to amend motion for reargument and denying as moot the motion to amend Exhibit G of the Complaint signed by Colm F. Connolly. (PDB) [Entered: 12/22/2021 10:17 AM]  |
| 12/23/2021 | <input type="checkbox"/> <u>17</u><br>2 pg, 156.8 KB   | ECF FILER: ENTRY OF APPEARANCE from Zi-Xiang Shen on behalf of Appellee(s) Patricia Schwartz, David White, Kathleen Vavala, Office of Disciplinary Counsel, Board of Professional Responsibility, Preliminary Investigatory Committee and Delaware Attorney General. [21-3198] (ZS) [Entered: 12/23/2021 02:56 PM]   |
| 12/29/2021 | <input type="checkbox"/> <u>18</u><br>3 pg, 137.39 KB  | BRIEFING NOTICE ISSUED. Brief on behalf of Appellant Meghan M. Kelly due on or before 02/07/2022. Appendix due on or before 02/07/2022. VACATED Per Clerk Order Issued on 05/12/2022.--[Edited 05/12/2022 by PDB] (DW) [Entered: 12/29/2021 11:21 AM]  |
| 01/03/2022 | <input type="checkbox"/> <u>20</u><br>7 pg, 1.39 MB  | MOTION filed by Appellant Meghan M. Kelly to stay briefing schedule. Certificate of Service dated 12/29/2021. Service made by US mail. (PDB) [Entered: 01/05/2022 12:07 PM]  |

- 01/04/2022  19  
5 pg, 754.14 KB Certified Copy of Amended Notice of Appeal filed 01/03/2022 received from Clerk of District Court. (PDB) [Entered: 01/04/2022 11:02 AM]
- 01/06/2022  21  
144 pg, 3.71 MB Appellant's Different In Forma Pauperis Motion Pursuant to 28 U.S.C. Section 1915 (a). To Waive Pacer Costs, Waive or Reduce Paper Copies of Appellant's Brief and Waive or Reduce the Number of Paper Copies of Appendix she is Required to Provide to The Court, and to Waive Costs due to Utter Poverty, and due to Foreseeable Costs Creating a Substantial Burden Upon Appellant's Access to the Court's and Forced Violation of her Religious Beliefs by Threat of Indebtedness, Separately Should Internet Access to Become Unavailable to Appellant as a Contingent Precedent to this Request, Appellant moves the Court Pursuant to Law 3d Cir. L.A.R. Misc 113.1(a) & (e) to Eliminate the Pacer Filing Requirement and Reduce the Amount of Copies of the Brief and Appendix to one Original and no Copies. Certificate of Service dated 01/03/2022. Service made by US mail. (PDB) [Entered: 01/14/2022 12:23 PM]
- 01/14/2022  22  
1 pg, 77.59 KB ORDER (Clerk) The foregoing letter motion is granted. The case is hereby stayed pending the District Court's decision on the motion to amend pursuant to Fed. R. Civ. P. 52 and 59, filed in the District Court on January 11, 2022. Appellant is directed to file a written report advising of the status of the pending motion on or before February 15, 2022, and every thirty (30) days thereafter, until the District Court has entered a decision on the motion to amend. The parties must immediately notify this Court, in writing, within seven (7) days of any order disposing of the motion to amend pursuant to Fed. R. Civ. P. 52 and 59, filed. (PDB) [Entered: 01/14/2022 12:34 PM]
- 01/14/2022  23  
19 pg, 963.51 KB STATUS REPORT/Withdraw Letter Construed as a Motion/ Intent to file a different Motion relating to E filing received from Appellant Meghan M. Kelly. (PDB) [Entered: 01/14/2022 08:17 PM]
- 01/21/2022  24  
3 pg, 107.59 KB ORDER (Clerk) Appellant has asked for a waiver of PACER fees associated with filing electronically in the Court of Appeals. In order for a waiver to be granted, a party must first have a PACER account. When a court grants a request to waive PACER fees, the Court must provide PACER with the account number to which the exemption applies and set a duration of time for the exemption. Appellant in her filings and correspondence acknowledges that she does not have a PACER account or Third Circuit ECF filing privileges. She also asks for assistance in setting up the required PACER account. Appellant may either set up a PACER account online by going to the PACER site <https://pacer.uscourts.gov/register-account/non-attorney-filers-crnecf> or contacting PACER directly at 800-676-6856. The Third Circuit Court of Appeals is a Next-Gen Court. As such Appellant will be able to register for ECF filing with the Third Circuit at the same time she registers with PACER. Once Appellant has a registered PACER account and Third Circuit ECF filing access, she may renew her motion for a PACER exemption with this Court and provide the required PACER account number. Appellant's request to file a reduced number of copies of the brief and appendix is granted. Provided that Appellant becomes a registered PACER user and Third Circuit ECF filer, she will be required to only file the brief and appendix electronically. Should Appellant file electronically, opposing counsel will be served electronically through ECF. Should Appellant opt not to file electronically, only an original brief and appendix will be required to be filed with the Court. Appellant will not be required to provide the additional copies for the Court. If Appellant does file in paper, Appellant is still obligated to serve copies on opposing counsel. As Appellant has been granted in forma pauperis status, Appellant may proceed on the original record in this Court reducing the need to file a complete appendix. Appellant must at a minimum include a copy of her notice of appeal and the District Court order and memorandum which are being appealed. Appellant may include additional record documents, but the Court will have access to the entire original district court record. Appellant is reminded that emailing her Case Manager directly does not constitute proper filing with this Court. Although the emails have been addressed in this order, the emails will not be entered on the Court's docket. (See Order for Full Text) (PDB) [Entered: 01/21/2022 03:53 PM]
- 02/07/2022  25   
8 pg, 3.42 MB ECF FILER: Motion filed by Appellant Meghan M. Kelly for leave to proceed In Forma Pauperis. Certificate of Service dated 02/07/2022. Service made by ECF, Email, US mail. [21-3198] (MMK) [Entered: 02/07/2022 12:12 PM]
- 02/10/2022  26  
17 pg, 10.15 MB ECF FILER: LETTER from Attorney Meghan M. Kelly, Esq. for Appellant Meghan M. Kelly Status update letter due by or before February 15, 2022. Certificate of Service dated 02/10/2022. Service made by ECF, Email, US mail. [21-3198] (MMK) [Entered: 02/10/2022 10:03 AM]
- 02/15/2022  27  
9 pg, 5.69 MB ECF FILER: LETTER from Attorney Meghan M. Kelly, Esq. for Appellant Meghan M. Kelly Letter updating the Court on 2/14/22 filings, Plaintiff's Motion for an urgent emergency preliminary restraining order to prevent state compelled violations of my religious beliefs, but for seeking to declare my faith in Jesus a mental disability.. Certificate of Service dated 02/15/2022. Service made by ECF, Email, US mail. [21-3198] (MMK) [Entered: 02/15/2022 03:43 PM]
- 03/10/2022  28  
25 pg, 637.64 KB ECF FILER: LETTER by Appellant Meghan M. Kelly for Monthly status update letter, and request for an extension of time should Judge Connolly Colm's issue an order prior to March 21, 2022 to allow me to file objections in state court. Certificate of Service dated 03/10/2022. Service made by ECF, Email. [21-3198]-[Edited 03/24/2022 by PDB] (MMK) [Entered: 03/10/2022 05:53 PM]

- 03/12/2022  29  
8 pg, 4.13 MB  
ECF FILER: LETTER from Attorney Meghan M. Kelly, Esq. for Appellant Meghan M. Kelly Second letter providing an update, dated March 12, 2022, due by or before March 15, 2022, which also includes a request for additional time to appeal, should a decision be rendered. Certificate of Service dated 03/12/2022. Service made by ECF, Email. [21-3198] (MMK) [Entered: 03/12/2022 11:12 AM]
- 03/24/2022  30  
2 pg, 160.17 KB  
ORDER (Clerk) Appellant has a request for a PACER exemption when accessing both the Court of Appeals case at No. 21-3198 and the District Court case at No. 21-1490. The Court of Appeals has the authority, which has been delegated to the Clerk, to grant exemptions for the payment of fees for access via PACER to the electronic case files maintained in this court only. Any request to waive fees for access to electronic records maintained in the District Court must be presented to the District Court. Appellant Meghan M. Kelly PACER Account No. 6975241 shall be exempt from the payment of fees for access via PACER to the electronic case files maintained in the Court of Appeals in appeal No. 21-3198, only. This exemption shall be applied to nunc pro tunc to November 30, 2021 and is valid until November 30, 2022 or the issuance of the mandate in No. 21-3198, whichever occurs first. This exemption may be revoked at the discretion of the Court at any time. A copy of this order will be forwarded to the PACER Service Center. Appellant also request the waive transcript fees and other costs such as witness fees. Any request for such relief should be requested in the District Court. With respect to the requests for additional time presented in the letters dated March 10 and 12, 2022, it is unclear the actual relief Appellant is requesting. To the extent that appellant is seeking a further stay of the current appeal should the District Court rule on the pending motion to alter amend, Appellant may file such a motion at that time in the Court of Appeals. If Appellant is seeking to extend the time for filing an appeal from any subsequent order of the District Court, that request must be presented to the District Court. Appellant is advised that the status reports required by the Clerk's January 14, 2022 to be filed every 30 days need only state that the motion to alter or amend remains pending before the District Court if the motion has not yet been decided by that court. (PDB) [Entered: 03/24/2022 08:53 AM]
- 04/09/2022  31  
48 pg, 28.62 MB  
ECF FILER: LETTER from Attorney Meghan M. Kelly, Esq. for Appellant Meghan M. Kelly Status update letter, request, on the condition precedent I appeal, so as to make it ripe, for a determination on pacer first, so I may see documents, for additional time and pages, due to the voluminous procedural history and amount of motions to appeal. Certificate of Service dated 04/09/2022. Service made by ECF, Email. [21-3198] (MMK) [Entered: 04/09/2022 09:24 PM]
- 04/27/2022  32  
11 pg, 5.62 MB  
ECF FILER: Letter dated 04/27/2022 filed by Appellant Meghan M. Kelly for the Court's information, which advises that the district court has ruled on the pending motions. Service made by ECF, Email. [Edited 04/27/2022 by PDB] (MMK) [Entered: 04/27/2022 07:21 AM]
- 04/27/2022  33  
TEXT ONLY ORDER (Clerk). It appearing that the district court recently decided the pending motions, the stay of briefing is hereby lifted. Appellant's brief and appendix must be filed and served within forty (40) days from the date of this order. (KM) [Entered: 04/27/2022 11:09 AM]
- 04/28/2022  34  
32 pg, 5.95 MB  
ECF FILER: LETTER from Attorney Meghan M. Kelly, Esq. for Appellant Meghan M. Kelly Letter regarding filing notice within the time frame, later, to prevent paper wars, and a motion to stay after the notice is filed, per my letters in DI 31, 32.. Certificate of Service dated 04/28/2022. Service made by ECF, Email. [21-3198] (MMK) [Entered: 04/28/2022 09:17 PM]
- 05/02/2022  35  
2 pg, 120.95 KB  
ORDER (Clerk) The foregoing letter presents several requests for relief. A motion must be filed if a party wishes to request specific relief from this Court; letters are not the appropriate vehicle for making such requests. Requests for relief from other courts should only be filed in that particular court. Appellant requests that the Court stay briefing pending the filing of a notice of appeal. Appellant is directed to file a formal motion stating the duration of the requested stay and in what case she plans to file the notice of appeal. Appellant also asks for a "predetermination of the Delaware District Court's denial of [her] request for an exemption of PACER fees ." Appellant was previously advised in the Clerk's March 24, 2022 order that "any request to waive fees for access to electronic records maintained in the District Court must be presented to the District Court." Appellant asks for "additional time, and paper" due to the "voluminous number of motions to appeal." To the extent Appellant is seeking an extension of time or expansion of the page limits regarding motions filed or to be filed in district court, she should file the motion directly in the district court. If Appellant is seeking an extension of time or expansion of the page limit for a filing in this Court, Appellant should file a separate motion asking for that relief along with the argument necessary to support the request. See generally Fed. R. App. P. 27. No action will be taken on any general requests at this time (PDB) [Entered: 05/02/2022 02:12 PM]
- 05/02/2022  36  
1261 pg, 252.61 MB  
ECF FILER: Motion filed by Appellant Meghan M. Kelly to stay briefing schedule. Certificate of Service dated 05/02/2022. Service made by ECF. [21-3198] (MMK) [Entered: 05/02/2022 03:48 PM]
- 05/02/2022  37  
1294 pg, 109.16 MB  
ECF FILER: ADDENDUM/EXHIBITS to Motion filed by Appellant Meghan M. Kelly to stay Scheduling Briefing, with special requests.. Certificate of Service dated 05/02/2022. Service made by ECF. [21-3198] [Edited 05/04/2022 by PDB] [Edited 05/04/2022 by PDB] (MMK) [Entered: 05/02/2022 04:04 PM]

- 05/02/2022  38  
498 pg, 16.75 MB  
ECF FILER: ADDENDUM/EXHIBITS to Motion filed by Appellant Meghan M. Kelly to stay briefing schedule. Certificate of Service dated 05/02/2022. Service made by ECF. [21-3198]--[Edited 05/04/2022 by PDB]--[Edited 05/04/2022 by PDB] (MMK) [Entered: 05/02/2022 04:12 PM]
- 05/02/2022  39  
1635 pg, 66.63 MB  
ECF FILER: ADDENDUM/EXHIBITS to Motion filed by Appellant Meghan M. Kelly to stay briefing schedule. Certificate of Service dated 05/02/2022. Service made by ECF. [21-3198]--[Edited 05/04/2022 by PDB] (MMK) [Entered: 05/02/2022 04:23 PM]
- 05/02/2022  40  
58 pg, 4.11 MB  
ECF FILER: MOTION filed by Appellant Meghan M. Kelly to correct Exhibit 37-7 and replace that docket item, with Correct Docket Item 20th-Ex-DI-21 attached to this motion. Certificate of Service dated 05/02/2022. Service made by ECF. [21-3198]--[Edited 05/04/2022 by PDB] (MMK) [Entered: 05/02/2022 09:39 PM]
- 05/08/2022  41  
17 pg, 2.35 MB  
ECF FILER: MOTION from Attorney Meghan M. Kelly, Esq. Appellant for Emergency motion filed this weekend, critical documents missing, sealed or destroyed at DI 4 and Third Circuit DI 39-2.. Certificate of Service dated 05/08/2022. Service made by ECF, Email. [21-3198]--[Edited 05/12/2022 by PDB] (MMK) [Entered: 05/08/2022 04:09 PM]
- 05/09/2022  42  
13 pg, 4 MB  
ECF FILER: SUPPLEMENTAL ELECTRONIC ADDENDUM to MOTION on behalf of Appellant Meghan M. Kelly containing On 5/7/22, I used the emergency email since the most critical pleadings for which this lawsuit is brought are missing from the record at 39-2. The District Court did not make the docs filed 10/25/21 available to public record at DI 4. Email 1 of 5. Certificate of Service dated 05/09/2022 by ECF. [21-3198] (MMK) [Entered: 05/09/2022 03:41 AM]
- 05/09/2022  43  
306 pg, 11.22 MB  
ECF FILER: SUPPLEMENTAL ELECTRONIC ADDENDUM to MOTION on behalf of Appellant Meghan M. Kelly containing On 5/7/22, I used the emergency email since the most critical pleadings for which this lawsuit is brought are missing from the record at 39-2. The District Court did not make the docs filed 10/25/21 available to public record at DI 4. Email 2 of 5. Certificate of Service dated 05/09/2022 by ECF. [21-3198] (MMK) [Entered: 05/09/2022 03:51 AM]
- 05/09/2022  44  
39 pg, 982.52 KB  
ECF FILER: SUPPLEMENTAL ELECTRONIC ADDENDUM to MOTION on behalf of Appellant Meghan M. Kelly containing On 5/7/22, I used the emergency email since the most critical pleadings for which this lawsuit is brought are missing from the record at 39-2. The District Court did not make the docs filed 10/25/21 available to public record at DI 4. Email 3 of 5. Certificate of Service dated 05/09/2022 by ECF. [21-3198] (MMK) [Entered: 05/09/2022 03:58 AM]
- 05/09/2022  45  
35 pg, 870.34 KB  
ECF FILER: SUPPLEMENTAL ELECTRONIC ADDENDUM to MOTION on behalf of Appellant Meghan M. Kelly containing On 5/7/22, I used the emergency email since the most critical pleadings for which this lawsuit is brought are missing from the record at 39-2. The District Court did not make the docs filed 10/25/21 available to public record at DI 4. Email 4 of 5. Certificate of Service dated 05/09/2022 by ECF. [21-3198] (MMK) [Entered: 05/09/2022 04:13 AM]
- 05/09/2022  46  
8 pg, 1.62 MB  
ECF FILER: SUPPLEMENTAL ELECTRONIC ADDENDUM to MOTION on behalf of Appellant Meghan M. Kelly containing On 5/7/22, I used the emergency email since the most critical pleadings for which this lawsuit is brought are missing from the record at 39-2. The District Court did not make the docs filed 10/25/21 available to public record at DI 4. Email 5 and 6 of 5. Certificate of Service dated 05/09/2022 by ECF. [21-3198] (MMK) [Entered: 05/09/2022 04:28 AM]
- 05/11/2022  47  
11 pg, 2.08 MB  
Certified Copy of Amended Notice of Appeal filed 05/09/2022 received from Clerk of District Court. (PDB) [Entered: 05/11/2022 04:07 PM]
- 05/11/2022  48  
3 pg, 1.7 MB  
ECF FILER: Transcript Purchase Order Form (Part 1) filed by Appellant Meghan M. Kelly advising this court that no transcripts are available. [21-3198] (MMK) [Entered: 05/11/2022 06:02 PM]
- 05/12/2022  49  
2 pg, 101.5 KB  
ORDER (Clerk) The foregoing motions and filings are considered. The motion to correct/replace Exhibit 37-7 with Exhibit 20th-Ex-DI-21 is hereby granted. The Clerk has replaced Exhibit 37-7 with Exhibit 20th-Ex-DI-21 on the docket. The motion to stay the proceeding pending the filing of an appeal from the April 26, 2022 opinion and order is denied, in part, as unnecessary. On May 9, 2022, Appellant filed the notice of appeal in District Court, which has been docketed in No. 21-3198 as an amended notice of appeal. To the extent that Appellant seeks to modify the briefing schedule previously entered in No. 21-3198, the motion is granted, in part. The briefing schedule previously entered in this case is vacated, and a new briefing order will be issued. Appellant's motion for this Court to request digital data from the Delaware District Court is granted. It is noted that all videos submitted by Appellant to the District Court have been transmitted for the Court's use and consideration. Appellant may refer to the videos when drafting her appeal brief. (PDB) [Entered: 05/12/2022 09:34 AM]
- 05/12/2022  50  
2 pg, 106.06 KB  
ORDER (Clerk) On May 7, 2022, Appellant transmitted 5 emails to the emergency motions mailbox relating to the public record in the District Court. Then on May 8, 2022, Appellant filed 6 documents through CM/ECF. Both the May 7 and the May 2022 reflect Appellant's concerns about the District Court record. The different filings are not exact copies, but seek similar relief. Appellant is directed that she should choose only one means for filing. Documents which are submitted through email and CM/ECF must be reviewed for duplication and cause delays in processing. No action will be taken on the documents which were submitted by email on May 7, 2022 as these documents raise the same issues

and seek the same relief as the May 8, 2022 documents filed on CM/ECF. Appellant was previously advised that the proper method for seeking relief in this Court is to file a motion and not a letter. There are specific events in CM/ECF for filing a motion. Appellant's May 8, 2022 filing was entered as a letter with the text indicating that it was in reference to a motion in the docket text. The entry has been edited to reflect that the filing is a motion. Filings seeking relief must be filed as motions and not as letters. This Court has access to all documents that are part of the district court record. Appellant is advised that certain filings may be considered confidential in nature and restricted to the public. Therefore, those documents may not appear on a Lexis docket search. Appellant is ordered to: 1) file a list of all documents she believes are part of the District Court record but currently missing and attach those documents to the list; and, 2) file a separate list of all documents which were not part of the District Court record or currently missing from that record which Appellant seeks to present to the Court and attach those documents to the list. Both lists with the documents must be filed within 14 days from the date of this order. Should Appellant choose to file the lists and documents through CM/ECF, Appellant should file separate entries for both lists using the Document event under the Motions, Response, Replies category. (PDB) [Entered: 05/12/2022 03:32 PM]

- 05/13/2022  51 ECF FILER: UNOPPOSED Motion filed by Appellant Meghan M. Kelly to reconsider order dated 05/12/2022. Certificate of Service dated 05/13/2022. Service made by ECF. [21-3198] (MMK) [Entered: 05/13/2022 02:58 PM]  
177 pg, 5.46 MB
- 05/13/2022  52 ECF FILER: ELECTRONIC ADDENDUM to MOTION on behalf of Appellant Meghan M. Kelly containing Additional Exhibits to 3DI-51, Motion for opportunity to review the record in order to respond to the Order for two lists of documents under D.I. 50, or excusal from compliance with certificate of service.. Certificate of Service dated 05/13/2022 by ECF. [21-3198] (MMK) [Entered: 05/13/2022 03:16 PM]  
834 pg, 114.76 MB
- 05/15/2022  53 ECF FILER: UNOPPOSED Motion filed by Appellant Meghan M. Kelly to vacate order dated 04/26/2022. Certificate of Service dated 05/15/2022. Service made by ECF. [21-3198] (MMK) [Entered: 05/15/2022 04:32 PM]  
170 pg, 6.64 MB
- 05/15/2022  54 ECF FILER: ELECTRONIC ADDENDUM to MOTION on behalf of Appellant Meghan M. Kelly containing Exhibits to DI 53 Motion to vacate the district Court Order DI 60 Denying my request for waiver of court costs and a PACER exemption at DI 33. Certificate of Service dated 05/15/2022 by ECF. [21-3198] (MMK) [Entered: 05/15/2022 04:46 PM]  
177 pg, 8.57 MB
- 05/15/2022  55 ECF FILER: ELECTRONIC ADDENDUM to MOTION on behalf of Appellant Meghan M. Kelly containing Exhibits to DI 53 Motion to vacate district Court order, DI 60, denying my request for a PACER exemption and waiver of court costs, DI 33, due to utter poverty, and compelled religious violations. Certificate of Service dated 05/15/2022 by ECF. [21-3198] (MMK) [Entered: 05/15/2022 04:56 PM]  
110 pg, 16.85 MB
- 05/15/2022  56 ECF FILER: ELECTRONIC ADDENDUM to MOTION on behalf of Appellant Meghan M. Kelly containing Exhibits to DI 53, Motion appealing the District Court's denial of waiver of costs and PACER fees due to religious reasons, and compelled violations against religious beliefs. Certificate of Service dated 05/15/2022 by ECF. [21-3198] (MMK) [Entered: 05/15/2022 05:03 PM]  
970 pg, 58.53 MB
- 05/15/2022  57 ECF FILER: ELECTRONIC ADDENDUM to MOTION on behalf of Appellant Meghan M. Kelly containing Exhibits to DI 53, Motion to vacate the District Court Ruling D.I. 60 on D.I. 33. Certificate of Service dated 05/15/2022 by ECF. [21-3198] (MMK) [Entered: 05/15/2022 05:11 PM]  
301 pg, 39.98 MB
- 05/22/2022  58 ECF FILER: UNOPPOSED Motion filed by Appellant Meghan M. Kelly to vacate order dated 04/26/2022. Certificate of Service dated 05/22/2022. Service made by ECF. [21-3198] (MMK) [Entered: 05/22/2022 10:47 PM]  
86 pg, 48.81 MB
- 05/22/2022  59 ECF FILER: ELECTRONIC ADDENDUM to MOTION on behalf of Appellant Meghan M. Kelly containing Exhibits B-relating to worldometer, C-relating to healthcare proposals, law school and college healthcare and mental healthcare courses, cert to teach health, proposals to improve healthcare, surgery doc., D-evidence other lawyers participated remotely. Certificate of Service dated 05/22/2022 by ECF. [21-3198] (MMK) [Entered: 05/22/2022 10:57 PM]  
37 pg, 4.53 MB
- 05/23/2022  60 ECF FILER: Motion filed by Appellant Meghan M. Kelly to review order dated 05/12/2022. Certificate of Service dated 05/23/2022. Service made by ECF. [21-3198] (MMK) [Entered: 05/23/2022 12:09 PM]  
7 pg, 1.2 MB
- 05/23/2022  61 ECF FILER: Motion filed by Appellant Meghan M. Kelly to review order dated 05/12/2022. Certificate of Service dated 05/23/2022. Service made by ECF. [21-3198] (MMK) [Entered: 05/23/2022 02:16 PM]  
511 pg, 17.12 MB
- 05/23/2022  62 ECF FILER: ELECTRONIC ADDENDUM to MOTION on behalf of Appellant Meghan M. Kelly containing These two exhibits are not included in the preset list. I forgot to give this court part 2 of the Chancery Court Brief relating to Kelly v Trump in 3DI-43-3. I am sorry. Thank you.. Certificate of Service dated 05/23/2022 by ECF. [21-3198] (MMK) [Entered: 05/23/2022 02:34 PM]  
70 pg, 3.49 MB
- 05/24/2022  63 ORDER (Clerk) The foregoing motions and filings are considered. Appellant has filed a notice of appeal and an amended notice of appeal from a final order of the District Court. Appellant's challenge to the final order and any preliminary orders should be presented to this Court in Appellant's brief and not in individual motions. Appellant represents in her May 23, 2022 filing that she has complied with the  
2 pg, 104.21 KB

requirement that she provide the first list of missing documents. Appellant asserts that she has "placed [the documents] on the record below" in a filing with the District Court and therefore there is no list to provide. See District Court D.E. #61 & 66. Appellant also represents that she complied with the requirement that she provide a second list of missing documents. Based on Appellant's representations, no action need be taken on Appellant's motion for an opportunity to review the record or to be excused from compliance because it is unnecessary. The Clerk will issue a briefing schedule forthwith. (PDB) [Entered: 05/24/2022 03:22 PM]

05/24/2022  64  
3 pg, 222.7 KB

BRIEFING NOTICE ISSUED. Brief on behalf of Appellant Meghan M. Kelly due on or before 07/05/2022. Appendix due on or before 07/05/2022. (PDB) [Entered: 05/24/2022 03:24 PM]

05/27/2022  65  
25 pg, 3.28 MB

ECF FILER: UNOPPOSED Motion filed by Appellant Meghan M. Kelly to reconsider order dated 05/24/2022. Certificate of Service dated 05/27/2022. Service made by ECF. [21-3198] (MMK) [Entered: 05/27/2022 08:59 PM]

06/03/2022  66  
8 pg, 1.21 MB

ECF FILER: Motion filed by Appellant Meghan M. Kelly to accept Appellate brief that I seek advance permission to exceed the page limits by an unspecified number due to the voluminous number of items to appeal or address, and to appeal in nonconforming form pursuant to Fed. R. App. P. 2 for good cause and to expedite the cause by preventi. Certificate of Service dated 06/03/2022. Service made by ECF. [21-3198] (MMK) [Entered: 06/03/2022 01:22 PM]

06/07/2022  67  
2 pg, 106.08 KB

ORDER (Clerk) The motion for reconsideration at 1 is granted in part. Appellant's notice of appeal filed on May 9, 2022 will be docketed as a separate appeal at No. 22-2079. The appeals at Nos. 21-3198 and 22-2079 will be consolidated for all purposes. All case opening forms which have been filed in No. 21-3198 will be deemed filed in No. 22-2079, and, as such additional case opening forms are not required. Appellant's brief in No. 21-3198 is currently due to be filed on or before July 5, 2022. As the case have been consolidated for all purposes, appellant must file a consolidated brief on or before July 5, 2022. The Clerk previously granted Appellant leave to proceed on the original record. Appellant may also proceed on the original record in No. 22-2079. Appellant's request to have the District Court's April 26, 2022 order (Docket Entry No. 60) denying her motions at District Court Docket Entries Nos. 33 and 54 submitted to a motions panel is denied. Appellant's May 9, 2022 notice of appeal seeks review of these specific orders together with several other orders. It is inefficient use of judicial resource to indulge in piecemeal litigation. Appellant must present all issues in a single brief which will be presented to the merits panel. Appellant's motion at 2 is granted in part and denied in part. Appellant's request to expedite is denied. Appellant has not provided justification which would require a shorter briefing period or require a faster disposition by the Court. Appellant may file a motion for expedited disposition after briefing has concluded. Appellant's request to exceed the page limitation by an unspecified amount is denied. However, Appellant need not conform to structure of a formal brief and may submit one principal brief not to exceed 45 pages and one reply not to exceed 22 pages.—[Edited 06/07/2022 by PDB] (PDB) [Entered: 06/07/2022 10:24 AM]

06/08/2022  68  
11 pg, 1.21 MB

ECF FILER: Motion filed by Appellant Meghan M. Kelly in 21-3198, 22-2079 to stay Briefing and the proceeding, at DI. 64, part of the relief requested may be moot at the conclusion of the state proceedings, requesting a stay until appeal to US Supreme Court is complete or time to appeal to the US Supreme Court lapses in state court.. Certificate of Service dated 06/08/2022. Service made by ECF. [21-3198, 22-2079] (MMK) [Entered: 06/08/2022 05:51 PM]

06/23/2022  69  
9 pg, 1.19 MB

ECF FILER: Motion filed by Appellant Meghan M. Kelly in 21-3198, 22-2079 for Extension of Time to file App. Meghan Kelly's FRCP R 26(b) Motion for additional time to file a brief, should the court deny my Motion to stay the proceeding pending a determination in the state proceeding including appeals to the US Supreme Court, or the time for appeal lapses until/for 40 only if the stay is denied. I respectfully argued a stay must be granted. I am getting worried since the court's electronic filing services will be down tomorrow, and it is due July 5, only about 6 full business days, 5 excluding tomorrow.. Certificate of Service dated 06/23/2022. Service made by ECF. [21-3198, 22-2079] (MMK) [Entered: 06/23/2022 11:00 PM]

07/05/2022  70  
13 pg, 201.9 KB

ECF FILER: Motion filed by Appellees David A. White, Kathleen M. Vavala, Patricia B. Swartz, Office Disciplinary Counsel, Board on Professional Responsibility of the Supreme Court of the State of Delaware, Attorney General Delaware and Preliminary Investigatory Committee to summarily affirm. Certificate of Service dated 07/05/2022. Service made by US mail. [21-3198 ]SEND TO THE MERITS PANEL.—[Edited 09/06/2022 by PDB] (ZS) [Entered: 07/05/2022 04:08 PM]

07/06/2022  71  
1 pg, 107.74 KB

ORDER (Clerk) The foregoing motion is considered. Briefing is hereby stayed pending disposition of the motion for summary affirmance. The motion for summary affirmance and any response thereto are referred to a motions panel. If the motion for summary affirmance is denied or referred to the merits panel, Appellant's brief must be filed and served within forty (40) days of the date of the order denying or referring the motion. (PDB) [Entered: 07/06/2022 10:51 AM]

07/07/2022  72  
1 pg, 77.59 KB

ECF FILER: LETTER from Attorney Zi-Xiang Shen, Esq. for Appellees Attorney General Delaware, Board on Professional Responsibility of the Supreme Court of the State of Delaware, Office Disciplinary Counsel, Preliminary Investigatory Committee, Patricia B. Swartz, Kathleen M. Vavala and David A. White in 21-3198 and Appellees Patricia B. Swartz, Kathleen M. Vavala, David A. White, Board on Professional

Responsibility of the Supreme Court of the State of Delaware, Office Disciplinary Counsel, Preliminary Investigatory Committee and Attorney General Delaware in 22-2079 requesting that the motion for summary action apply to both appeals. Certificate of Service dated 07/07/2022. Service made by ECF. [21-3198, 22-2079] (ZS) [Entered: 07/07/2022 08:17 AM]

07/10/2022  73  
20 pg, 1.4 MB

ECF FILER: Motion filed by Appellant Meghan M. Kelly in 21-3198, 22-2079 for Extension of Time to file 10 days from the date of the Court's order denying a stay, or 10 days from the date the stay is lifted, until/for This may be up to 150 days or less, or possibly more depending on when the State court makes a determination which is usually within 90 days, and whether either party files an appeal within the additional 90 days, and whether the writ of cert is granted., to stay mandate. Certificate of Service dated 07/10/2022. Service made by ECF. [21-3198, 22-2079] (MMK) [Entered: 07/10/2022 10:13 PM]

08/13/2022  74  
214 pg, 30.13 MB

ECF FILER: LETTER from Attorney Meghan M. Kelly, Esq. for Appellant Meghan M. Kelly in 21-3198, 22-2079 This letter is for the Clerk of Court, required under Rules of Attorney Discipline Procedure Enforcement, Rule 6 to be distributed and considered with the attached documents.. Certificate of Service dated 08/13/2022. Service made by ECF. [21-3198, 22-2079] (MMK) [Entered: 08/13/2022 09:29 PM]

08/16/2022  75  
39 pg, 18.7 MB

ECF FILER: LETTER from Attorney Meghan M. Kelly, Esq. for Appellant Meghan M. Kelly in 21-3198, 22-2079 Letter correcting 3DI-74. Please strike the last paragraph of letter filed August 13, 2022 at 3DI-74, that letter is for information purposes only. Thank you.. Certificate of Service dated 08/16/2022. Service made by ECF. [21-3198, 22-2079] (MMK) [Entered: 08/16/2022 03:45 PM]

08/17/2022  76  
1 pg, 101.82 KB

ORDER (Clerk) The appellant electronically filed letters on the dockets of these appeals. They will remain on these dockets for whatever consideration the Court deems appropriate. Any proceedings that may be opened regarding the appellant's bar status in this Court would, however, be conducted separately from these appeals and under a different docket number. [21-3198, 22-2079] (KR) [Entered: 08/17/2022 04:17 PM]

08/22/2022  77

AMENDED LETTER from Appellant Regarding Order of the Supreme Court of Delaware Transferring Her to disability inactive Status. Service made on 08/24/2022 by ECF. [21-3198, 22-2079]. (PDB) [Entered: 08/24/2022 08:42 AM]

08/24/2022  78  
5 pg, 1.54 MB

ECF FILER: LETTER from Attorney Meghan M. Kelly, Esq. for Appellant Meghan M. Kelly in 21-3198, 22-2079 On Monday, I emailed Pam and alerted Desiree's team to upload DI 76 in the other matter when it arrives. The way this is uploaded is prejudicial and dis-favorable to me. Please strike this and reload the documents for the correct matter. Thank you. Certificate of Service dated 08/24/2022. Service made by ECF. [21-3198, 22-2079] (MMK) [Entered: 08/24/2022 03:08 PM]

08/24/2022  79  
5 pg, 1.93 MB

ECF FILER: Motion filed by Appellant Meghan M. Kelly in 21-3198, 22-2079 Pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike DI 77 as misfiled to be rescanned in to the Correct Matter No. 22-8037, without lifting my motion for a stay. Certificate of Service dated 08/24/2022. Service made by ECF. [21-3198, 22-2079]-[Edited 09/01/2022 by PDB] (MMK) [Entered: 08/24/2022 05:16 PM]

08/25/2022  80  
75 pg, 17.12 MB

ECF FILER: Second Motion filed by Appellant Meghan M. Kelly Pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike 3DI 77 as misfiled to be rescanned in to the Correct Matter Np. 22-8037, without lifting my motion for stay. Certificate of Service dated 08/25/2022. Service made by ECF. [21-3198, 22-2079]-[Edited 09/01/2022 by PDB] (MMK) [Entered: 08/25/2022 01:38 PM]

08/25/2022  81  
76 pg, 12.66 MB

ECF FILER: ELECTRONIC ADDENDUM to MOTION on behalf of Appellant Meghan M. Kelly in 21-3198, 22-2079 containing Exhibits to DI 80, Petitioner Plaintiff Meghan Kelly's Second Motion pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike 3DI 77 as misfiled to be rescanned in to the Correct Matter No. 22-8037, without lifting my motion for a stay.. Certificate of Service dated 08/25/2022 by ECF. [21-3198, 22-2079]-[Edited 08/26/2022 by PDB] (MMK) [Entered: 08/25/2022 02:00 PM]

08/25/2022  82  
32 pg, 3.22 MB

ECF FILER: CORRECTED Motion filed by Appellant Meghan M. Kelly in 21-3198, 22-2079 Pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike 3DI 77 as misfiled to be rescanned in to the Correct Matter No. 22-8037, without lifting my motion for a stay. Certificate of Service dated 08/25/2022. Service made by ECF. [21-3198, 22-2079]-[Edited 09/01/2022 by PDB] (MMK) [Entered: 08/25/2022 08:44 PM]

08/25/2022  83  
399 pg, 24.92 MB

ECF FILER: SUPPLEMENTAL ELECTRONIC ADDENDUM to MOTION on behalf of Appellant Meghan M. Kelly in 21-3198, 22-2079 containing For DI 80, 81, 82, For the corrected Second Motion to remove DI 77, the motion for an extension contained in DI 87-7, was moot. I filed early. The attached Motion for time was granted for good cause at my discovery of concealed evidence favorable to me. Certificate of Service dated 08/25/2022 by ECF. [21-3198, 22-2079] (MMK) [Entered: 08/25/2022 11:18 PM]

08/27/2022  84  
9 pg, 3.54 MB

ECF FILER: LETTER from Attorney Meghan M. Kelly, Esq. for Appellant Meghan M. Kelly in 21-3198, 22-2079 Provide an update, filing concerns relating to other matter, and report 3 reciprocal orders have been issued. Thank you. Certificate of Service dated 08/27/2022. Service made by ECF. [21-3198, 22-2079] (MMK) [Entered: 08/27/2022 04:23 PM]

08/29/2022  85  
252 pg, 58.03 MB

ECF FILER: LETTER from Attorney Meghan M. Kelly, Esq. for Appellant Meghan M. Kelly in 21-3198, 22-2079 State Court update, outstanding motions, filing issues, time constraints, 6 other jurisdictions, need for addition bike trips to the post office. May need additional time for the disciplinary matter. I will standby, and not rush the filing. Thank you.. Certificate of Service dated 08/29/2022. Service made by ECF. [21-3198, 22-2079] (MMK) [Entered: 08/29/2022 02:54 PM]

08/30/2022  86  
2 pg, 122.84 KB

ORDER (Clerk) Appellant has been calling and emailing the Clerk's office with increasing frequency. Although the Clerk's office staff endeavors to answer questions, Appellant's communications are requiring staff to take substantial time to review and decipher. In light of the frequency and excessive often irrelevant nature of communications with the Third Circuit Clerk's staff, the following restrictions hereby apply to Appellant in this Court: 1) Appellant shall limit her communications with the Clerk's Office staff to no more than one phone call or one email each day; 2) Appellant's communications with the Clerk's Office staff are restricted to procedural questions only. Appellant should focus her communication to the specific question or information requested; 3) Appellant need not alert the Clerk's Office staff via email or phone in advance of future filings in this Court (unless such filings are a true emergency) or provide commentary related to her cases. Only filings will be presented to the Court. Commentary contained in emails or relayed verbally to Clerk's office staff will not be presented to the Court; 4) Appellant has submitted filings to this Court through several different methods. Submitting filings through multiple methods only delays processing as staff are required to compare filings to avoid duplication. Appellant previously registered as an electronic filer and remains an electronic filer in this Court. Substantive filings should only be submitted through CM/ECF. Emailed filings will no longer be permitted; and, 5) Appellant is discouraged from filing amended or corrected versions of filings as continued filings will delay resolution of the appeals. Appellant should endeavor to submit final versions of filings and only amend prior filings when truly needed. Violations of this order may result in further action, including the referral of this matter to the Court for the possible imposition of additional restrictions and or sanctions. [21-3198, 22-2079]. (PDB) [Entered: 08/30/2022 11:46 AM]

08/30/2022  87  
600 pg, 63.66 MB

ECF FILER: Motion filed by Appellant Meghan M. Kelly in 21-3198, 22-2079 to review the Clerk's order dated 08/30/2022, and to strike DI 77 as improperly filed. Certificate of Service dated 08/30/2022. Service made by ECF. [21-3198, 22-2079]—[Edited 09/01/2022 by PDB] (MMK) [Entered: 08/30/2022 09:11 PM]

09/01/2022  88  
11 pg, 1019.34 KB

ECF FILER: SUPPLEMENTAL Motion filed by Appellant Meghan M. Kelly in 21-3198, 22-2079 to vacate order dated 08/30/2022, to supplement the record Kelly's Motion to supplement the record with additional information, pursuant to Rule 10 (e) (2) (3) to include Meghan Kelly's legal theory for appeal of Case No 22-8037 to the US Supreme Court, and additional facts thwarting plans, in reviewing DI 87.. Certificate of Service dated 09/01/2022. Service made by ECF. [21-3198, 22-2079] (MMK) [Entered: 09/01/2022 05:54 PM]

09/01/2022  89  
2 pg, 671.43 KB

ECF FILER: ELECTRONIC ADDENDUM to MOTION on behalf of Appellant Meghan M. Kelly in 21-3198, 22-2079 containing Exhibit A, the postal receipt for the 3 boxes in the closed disciplinary matter 22-8037, to be attached to DI 88 Motion to supplement the record with additional information, in consideration of Motion for reargument on Order dated 8/30/22 DI 86-88. Certificate of Service dated 09/01/2022 by ECF. [21-3198, 22-2079] (MMK) [Entered: 09/01/2022 07:27 PM]

09/06/2022  90  
3 pg, 91.99 KB

ORDER (SMITH, KRAUSE and RESTREPO, Circuit Judges) The foregoing motions are considered. Appellee's motion for summary affirmance is referred to the merits panel. Appellee's request to have the motion for summary action docketed in No. 22-2079 is granted. Appellant's requests for a stay pending resolution of her state proceeding, including a possible 60(b) motion or petition for writ of certiorari, are denied. Appellant's request for an extension of time to file her brief is granted. Appellant shall file her brief and appendix in the consolidated cases within 40 days of the date of this order. Appellant's corrected motion to strike docket item #77 (#11 in No. 22-2079) is granted. The Clerk is directed to remove this document from the dockets. Appellant's initial motions (Nos. 9 and 10 above) regarding removing this document are dismissed as moot. Appellant's motion to review and vacate the Clerk's order of August 30, 2022 and motion to supplement the record are denied. Appellant is advised that she must comply with the Clerk's order of August 31, 2022 in all respects, or she will be subject to the imposition of sanctions, including a monetary fine. Importantly, Appellant may file pleadings, briefs, and other documents only through the Court's CM/ECF system. The Clerk's Office will not process or respond to any filings or documents sent by any other method. Appellant is also cautioned to avoid filing amended or corrected versions of documents. Such filings cause unnecessary delay in the disposition of appeals. Panel No.: ACO-086. Krause, Authoring Judge. [21-3198, 22-2079]. (PDB) [Entered: 09/06/2022 10:09 AM]

09/22/2022  91  
68 pg, 30.29 MB

ECF FILER: Motion filed by Appellant Meghan M. Kelly in 21-3198, 22-2079 to amend order dated 03/24/2021. Certificate of Service dated 09/22/2022. Service made by ECF. [21-3198, 22-2079] (MMK) [Entered: 09/22/2022 02:33 PM]

09/26/2022  92  
1 pg, 139.56 KB

ORDER (Clerk) By order entered March 24, 2022, Appellant was granted an exemption for payment of PACER fees for appeal No. 21-3198 valid until November 30, 2022 or the issuance of the mandate in No. 21-3198, whichever occurs first. This exemption, applied to account No. 6975241, is hereby extended to case No. 22-2079 in addition to No. 21-3198. The exemption is valid until September 30, 2023 or issuance of the mandate in the consolidated actions Nos. 21-3198 and 22-2079, whichever occurs first. This exemption can be revoked as any time. A copy of this order will be forwarded to the PACER Service



Center. [21-3198, 22-2079] (PDB) [Entered: 09/26/2022 08:52 AM]

10/14/2022  93  
9 pg, 1.17 MB

ECF FILER: LETTER from Attorney Meghan M. Kelly, Esq. for Appellant Meghan M. Kelly and Attorney Attorney General Delaware for Appellee Attorney General Delaware in 21-3198, 22-2079 Letter informing the Court the DE District Court accepted a FRCP 60 motion requiring a stay in this court, and a Second Motion for a stay. The Court accidentally split my second motion in two docket entrees DI 96-97. Notice of new facts will be gathered.. Certificate of Service dated 10/14/2022. Service made by ECF. [21-3198, 22-2079] (MMK) [Entered: 10/14/2022 12:08 AM]

10/18/2022  94  
1 pg, 88.86 KB

ORDER (Clerk) The appellant's request to stay briefing in these appeals pending her new Rule 60(b) motion is DENIED. The new motion does not affect these appeals under Federal Rule of Appellate Procedure 4(a)(4). If necessary, the appellant and district court can utilize the procedure explained in Federal Rule of Appellate Procedure 12.1 and Federal Rule of Civil Procedure 62.1. This order does not change the previously established deadline for the appellant's brief. The appeals may be dismissed without further notice if a brief is not filed. See 3d Cir. L.A.R. 107.2(b). [21-3198, 22-2079] (PDB) [Entered: 10/18/2022 03:29 PM]

10/20/2022  95  
314 pg, 19.74 MB

ECF FILER: Motion filed by Appellant Meghan M. Kelly in 21-3198, 22-2079 for Extension of Time to file Appellant Brief per Order DI 94's direction to file it 7 days after the date it was due, October 17, 2022, now apparently due October 24, 2022. until/for A time this court deems just and fair. I can ask for 30 days, but I am going to start working on it now, in hopes to file it asap. I have not started. I am sorry. I really believed the appeal would be stayed by a Rule 60 motion. I was wrong. Thank you.. Certificate of Service dated 10/20/2022. Service made by ECF. [21-3198, 22-2079] (MMK) [Entered: 10/20/2022 05:04 PM]

10/21/2022  96  
15 pg, 487.69 KB

ECF FILER: AMENDED Motion filed by Appellant Meghan M. Kelly in 21-3198, 22-2079 to amend Respondent Meghan Kelly's Motion, for good cause, for additional time to draft the Brief in light of Order, dated October 18, 2022, at DI 94 to include 30 days and eliminate typing errors.. Certificate of Service dated 10/21/2022. Service made by ECF. [21-3198, 22-2079] (MMK) [Entered: 10/21/2022 06:14 PM]

10/21/2022  97  
2 pg, 703.16 KB

ECF FILER: CERTIFICATE OF SERVICE for to file an amended document. Service made on 10/21/2022 by ECF. [21-3198, 22-2079] (MMK) [Entered: 10/21/2022 07:03 PM]

10/22/2022  98  
80 pg, 2.94 MB

ECF FILER: ELECTRONIC PRO SE BRIEF with Appendix attached from Appellant Meghan M. Kelly in 21-3198, 22-2079. Certificate of Service dated 10/22/2022 by ECF. [21-3198, 22-2079] (MMK) [Entered: 10/22/2022 07:24 PM]

10/22/2022  99  
46 pg, 27.83 MB

ECF FILER: Motion filed by Appellant Meghan M. Kelly in 21-3198, 22-2079 for Extension of Time to file I respectfully request an extension for both opposing counsel Shen Zi-Xiang and I to have 45 days. She could have more to respond if she requires. I have not had time to draft my appeal to the US Supreme Court. It is due in less than 45 days. Thank you until/for 45 days for my reply. I seek to be fair by asking for 45 days on behalf of opposing counsel too should she require time. Thank you.. Certificate of Service dated 10/22/2022. Service made by ECF. [21-3198, 22-2079] (MMK) [Entered: 10/22/2022 11:56 PM]

10/24/2022  100  
2 pg, 85.94 KB

ORDER (PHIPPS, Circuit Judge) The foregoing Appellant's Motion for 30-Day Extension of Time to File Brief, which may be construed as a Motion to File the Opening Brief Out of Time, and Appellant's Corrected Motion for 30-Day Extension of Time to File Brief, which may be construed as a Motion to File the Opening Brief Out of Time, are granted, such that Appellant's opening brief, which was filed on October 22, 2022, is deemed timely. These two motions are denied in all other respects. Appellant's Motion to Extend Remaining Briefing Deadlines: Response Brief Due within 45 Days, and Reply Brief Due 45 Days Thereafter is denied, without prejudice, as it is premature. Appellant may renew her motion for an extension of time to file her reply brief after Appellees file their responsive brief if, at that time, Appellant continues to believe an extension of time to file her reply is necessary. Panel No.: CCO-006. Phipps, Authoring Judge. [21-3198, 22-2079]. (PDB) [Entered: 10/24/2022 04:28 PM]

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# Exhibit Q

**THE SUPREME COURT OF THE STATE OF DELAWARE**

In the Matter of a Member of the Bar of the ) Supreme Ct. No. 58, 2022  
Supreme Court of the state of Delaware ) Misc. 541,  
Meghan M. Kelly, respondent. ) Board Case No. 115327-B

**Respondent's Meghan Kelly's Motion to be excused from the notary and affirming requirements in Delaware Court pleadings**

**Respondent Meghan Kelly respectfully requests to be excused from the notary and affirming requirements in Delaware Court pleadings.**

1. On May 4, 2022, the Chancery Court adopted a new rule, Rule 178B ("New-Rule"), which requires notarizations of Chancery Court pleadings, without exception for declarations for indigents who "proceed in forma pauperis" and persons adjudicated disabled to "terminate [such disability adjudication] in favor of less restrictive measures." (See, attached Exhibit A)

2. The ODC seeks to adjudicate me disabled to compel government incited restrictive means in retaliation for my exercise of fundamental rights in violation of the First and Fourteenth Amendments. US Amend I, XIV.

3. I am an indigent who would be required to proceed in forma pauperis in the Chancery Court, the Court of equity, to lift any restrictions upon my license to practice law, or other restrictions, should the Delaware Supreme Court adjudicate me disabled, but for my religious-political beliefs, contained in my

petitions in violation of the First and Fourteenth Amendment Equal Protections Clause. US Amend I, XIV.

4. It is against my religious beliefs to swear by notarizing Court pleadings.

5. It appears this Court has made a determination on my case, before granting me an opportunity to be heard, while colluding with the Chancery Court below, by requiring indigents and those deemed or alleged mentally disabled to notarize petitions, without exception for declarations. The Court appears to pass this New-Rule to intentionally create an obstacle, targeting me selectively, to prevent me from exercising the right to petition in the Chancery Court to lift any restriction the Delaware Supreme Court may adjudicate upon me or my active license to practice law.

6. The Chancery Court and this Court had notice it is against my religious beliefs to notarize by swearing in by *Kelly v Trump*, 21-0809 and 21-119, *Kelly v Democrats*, 2020-0157. (See attached Exhibits B-C); (Also see, Objn-Ex-N, internal Exhibit 3 to Exhibit 6, DI 43).

7. The new Chancery Court requirement conflicts with federal law, 28 U.S.C. § 1746, and our Constitution which specifically allows for affirmations or declarations.

8. The original 1787 text of the Constitution of the United States makes three references to an "oath or affirmation": In Article I, senators must take a special oath or affirmation to convene as a tribunal for impeachment; in Article II, the president is required to take a specified oath or affirmation before entering office; and in Article VI, all state and federal officials must take an oath or affirmation to support the Constitution. Another reference appears in the Fourth Amendment, which specifies that all warrants must be supported by evidence given under oath or affirmation.

9. Though U.S. presidents are free to either swear or affirm the inaugural oath of office, I am aware of only one president who has chosen to affirm. The nation's 14th president, Franklin Pierce, affirmed the oath upon his March 4, 1853 inauguration. ([https://en.wikipedia.org/wiki/Franklin\\_Pierce](https://en.wikipedia.org/wiki/Franklin_Pierce)). I applaud his conduct for keeping religion and state separate so as not to use God's name or the name of religion for political vanity. *Exodus 20:7*

10. The right not to swear in stems from an old England case, determined on December 1678, trial of William Brayn. ( Attached as Exhibit D)

11. It is against my religious beliefs to affirm too. I am a Christian. God teaches us not to promise, affirm or swear, as our lives are not our own, but God's, not man's, to own by compelled debt in exchange with Constitutional exercise of fundamental rights. See, 1 *Corinthians 6:19*.

12. Debt is against my religious beliefs. See, *Romans* 13:8. I believe those who create artificial debt sin and will be cast in the fires of hell for requiring people to pay for what is not theirs to sell, including freedom. Yet, if they repent by cleaning their hearts, they will have eternal life in heaven. I believe their sins will be remembered no more by God.

13. Declarations, affirmations and oaths violate my religious beliefs. I am a Christian. I read the Bible for guidance. Jesus teaches “do not swear, let your yes be yes and your no be no. Everything else is from the evil one.” *Matthew* 5:35-37.

14. In the Old testament of the Bible, two dads got themselves into trouble for disobeying God by making promises, affirming or swearing in the bible. One father promised God if everything goes well with his aim, he would sacrifice the first thing that greeted him at home. *Judges* 11:30-31. Expecting life stock, the man greeted his daughter, and sacrificed her under the guise to God, but in reality, for his own sinful pride to keep his word. It would have been better not to sacrifice her. It is written “God desires mercy not sacrifice.” *Matthew* 12:7, *Hosea* 6:6, *Isaiah* 1:11-17.

15. A second father got into trouble got into trouble for disobeying God by stating anyone who breaks a fast will be killed. His son ate honey, not knowing about the fast. The dad violated a more important command, to protect his

appearance and pride, which is a greater sin. 1 *Samual* 14:27. It is my religious belief dads and all people should not make material oaths to keep their bond or word. It is better to break their promise, than to sell the souls of their children or their own soul for material gain, which makes my heart have great sadness. These two dads misbehaved. We should not promise under penalty or debt. My word should suffice, based on my religious beliefs. I request that I, individually, no longer be required to affirm or swear to pleadings before the Delaware Courts.

16. God teaches I am a temple. I am not my own. I am not to make oaths, affirmations, or declarations that may make man or money my master as creditor. See, *Matthew* 6:24. 2

17. I fear you may cause injustice if I do not sign the declaration, but I request the Delaware Supreme Court excuse me from the requirement in all courts, herewith, including the Delaware Chancery Court. Injustice is a greater sin. I must seek justice with mercy faithfully to obey Jesus. *Matthew* 23:23.

18. The state has an important interest in determining the truth, but removing the obligation that compels me to violate my religious belief in exchange to exercise the right to defend my exercise of fundamental rights, is not the least restrictive means in my case. I fear God, and do not require the threat of punishments to speak honestly. The Court must grant an exception for me in order

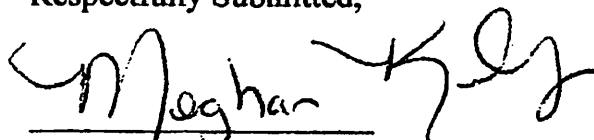


not to compel me to violate my religious beliefs in exchange with permission to exercise a fundamental right.

Wherefore, I pray this Court grants my motion, and relieves me of affirming and notarizing documents by signing the attached order.

June 6, 2022

Respectfully Submitted,



Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
Unrepresented indigent party,  
Bar No. 4968  
(Words 1, 137)

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

Dated: June 6, 2022

Meghan Kelly (printed)

Meghan Kelly (signed)

# Exhibit A

**IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE**

**IN RE: ADDITION OF NEW RULE 178B TO THE COURT OF CHANCERY RULES, SECTION XVII**

This 4th day of May 2022, IT IS HEREBY ORDERED that the Court of Chancery Rules, Section XVII, are revised to add new Rule 178B, effective immediately.

**Rule 178B is added as follows:**

**Rule 178B. Unsworn Declarations under Penalty of Perjury in Certain Guardianship Matters.**

Pursuant to Section 3927 of Title 10, the use of an Unsworn Declaration under Penalty of Perjury is hereby authorized for pleadings or papers filed in guardianship matters, except for those listed below. Unsworn Declarations under Penalty of Perjury may be used in lieu of verifications, sworn declarations, affidavits, and notarized signatures that are otherwise required on pleadings or papers. An Unsworn Declaration under Penalty of Perjury may not be used with any of the following: petitions seeking to appoint a guardian for adults with an alleged disability or to appoint a guardian of property for a minor, to remove a guardian and/or appoint a successor guardian, and to add a co-guardian; physician's affidavits, and personal information sheets filed by petitioners related to those petitions; petitions to terminate a guardianship due to recovery of the person with a disability or to terminate in favor of less restrictive measures; petitions for instructions regarding life-sustaining procedures; consents filed related to those petitions; petitions to transfer funds at majority in guardianships of a minor's property; and applications to proceed *in forma pauperis*. The Chancellor may further limit the use of Unsworn Declarations by Order or Administrative Directive.

*Creating an additional substantial burden in terms of cost for those who may not be able to afford it.*

FOR THE COURT:

/s/ Kathaleen St. J. McCormick  
Chancellor Kathaleen St. J. McCormick

# Exhibit B

21-1490/21-3198 Fw: Swearing in verses affirming the reason why courts now say swear or affirm Fw: Sponsor for the United States Supreme Court

From: Meg Kelly (meghankellyesq@yahoo.com)

To: zi-xiang.shen@delaware.gov; david.weiss@usdoj.gov; meghankellyesq@yahoo.com

Date: Thursday, May 5, 2022, 10:11 AM EDT

I saw the new rule requiring in forma pauperis and mentally disabled to notarize with no exception for religious beliefs sent to all lawyers yesterday. The Chancery Court read about this twice in my complaint against Donald J. Trump and a second time in Kelly v democrats. They knew this. I am disappointed.

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

From: Meg Kelly <meghankellyesq@yahoo.com>

To: Johnson Karlis P (Courts) <karlis.johnson@delaware.gov>; Dolph Lisa (Courts) <lisa.dolph@delaware.gov>; Meg Kelly <meghankellyesq@yahoo.com>

Sent: Thursday, May 5, 2022, 10:08:24 AM EDT

Subject: Swearing in verses affirming the reason why courts now say swear or affirm Fw: Sponsor for the United States Supreme Court

Do you see how the Chancery Court Order violates my faith in Jesus.

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

From: Meg Kelly <meghankellyesq@yahoo.com>

To: "Jeannie.Balke@state.de.us" <Jeannie.Balke@state.de.us>

Sent: Tuesday, February 21, 2012, 03:10:13 PM EST

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.de.us](mailto:Jeannie.Balke@state.de.us)> wrote:

> From: Balke Jeannie (Courts) <[Jeannie.Balke@state.de.us](mailto:Jeannie.Balke@state.de.us)>  
> Subject: RE: Sponsor for the United States Supreme Court  
> To: "Meg Kelly" <[meghankellyesq@yahoo.com](mailto: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](mailto:meghankellyesq@yahoo.com)  
> 302-537-1089  
> Licensed DE, DC & PA  
>  
> DE Bar # 4968  
>



Family Court Doc1.doc  
471.5kB

# Exhibit C

## Swearing in verses affirming the reason why courts now say swear or affirm Fw: Sponsor for the United States Supreme Court

From: Meg Kelly (meghankellyesq@yahoo.com)

To: kariis.johnson@delaware.gov; lisa.dolph@delaware.gov; meghankellyesq@yahoo.com

Date: Thursday, May 5, 2022, 10:08 AM EDT

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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.

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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.



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> From: Balke Jeannie (Courts) <[Jeannie.Balke@state.de.us](mailto:Jeannie.Balke@state.de.us)>  
> Subject: RE: Sponsor for the United States Supreme Court  
> To: "Meg Kelly" <[megk@deliversandry.com](mailto:megk@deliversandry.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:[megk@deliversandry.com](mailto:megk@deliversandry.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  
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> 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  
> [megk@deliversandry.com](mailto:megk@deliversandry.com)  
> 302-537-1089  
> Licensed DE, DC & PA

> DE Bar # 4968



Family Court Doc1.doc  
471.5kB



Family Court Doc2.doc  
270kB

# Exhibit D

**The Proceedings of the Old Bailey**

**London's Central Criminal Court, 1674 to 1913**

---

William Brayn.

**Theft:** animal theft.

11th December 1678

**Reference Number** t16781211e-37

**Verdict** Not Guilty

**Related Material**  Associated Records

Cite this text

*Old Bailey Proceedings Online* (www.oldbaileyonline.org, version 8.0, 04 June 2022), December 1678,

**Actions** trial of William Brayn (t16781211e-37).

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**Navigation** < Previous text (trial account) | Next text (trial account) >

William Brayn Indicted, for that he, the 6th. of Septemb. 1678. did steal one Gelding, colour brown , from Ambros Galloway . He pleaded Not guilty, and put himself upon the Countrey.

William Brayn, for stealing a Gelding from Ambros Galloway; against whom

One testifi'd his knowledge, that it was Ambros Galloways Horse; and another, that he bought it of the Prisoner. But Ambros himself, being a Quaker, would not, for Conscience-sake, as he said, swear, and so could give no testimony about his losing him. Upon which the Court directed the Jury to find the Prisoner Not guilty for want of Evidence, and committed the Quaker, as a concealer of Felony, for refusing an Oath to Witness for the King.

That William Brayne, is not guilty .

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## Footer

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# Exhibit R

approval as a condition to the issuance of a subpoena addressed to an attorney in any criminal proceeding, including a grand jury, shall not be required. The propriety of such a subpoena may be considered on a motion to quash.

**Rule V -- Disciplinary or Other Proceedings against Attorneys.**

- A. When the misconduct or other basis for action against an attorney (other than as set forth in Rule II) or allegations of the same which, if substantiated, would warrant discipline or other action against an attorney admitted to practice before this court shall come to the attention of a Judge of this court, whether by complaint or otherwise, and the applicable procedure is not otherwise mandated by these Rules, the judge shall refer the matter to the Chief Judge who shall issue an order to show cause.
- B. Upon the respondent-attorney's answer to the order to show cause, if any issue of fact is raised or the respondent-attorney wishes to be heard in mitigation the Chief Judge shall set the matter for prompt hearing before one or more judges of this court, provided however that if the proceeding is predicated upon the complaint of a judge of this court the hearing shall be conducted before a panel of three other judges of this court appointed by the Chief Judge.
- C. This court may at any stage appoint counsel to investigate and/or prosecute the proceeding under this Rule.
- D. This court may refer any matter under this Rule to the appropriate state disciplinary or other authority for investigation and decision before taking any action. The attorney who is the subject of the referral shall promptly notify this court of the decision of any state court or authority and shall take whatever steps are necessary to waive any confidentiality requirement so that this court may receive the record of that referral.
- E. The judge or judges to whom any proceeding under this Rule is assigned shall make a report and recommendation to the court after the parties have been heard, which will be filed under seal and served on the parties. A party shall serve and file under seal any objections within fourteen (14) days thereafter. Further submissions by any party shall be served and filed under seal within seven (7) days after service of any objections. The court shall then decide the matter; after decision the report and recommendation, any objections, and any submissions shall be unsealed unless otherwise ordered by the court.

PA-ODC-7

# Exhibit S

SUPREME COURT OF THE UNITED STATES  
OFFICE OF THE CLERK  
WASHINGTON, D. C. 20543

Meghan Marie Kelly  
Attorney at Law  
34012 Shawnee Drive  
Dagsboro, DE 19939

To Meghan Marie Kelly:

I am pleased to notify you on behalf of the Chief Justice and Associate Justices that the motion for your admission to practice has been granted and that you are now a member of the Bar of the Court and an officer of the Court.

Your admission is effective May 29, 2012 and a certificate of admission will be mailed to you in approximately ten weeks.

As a member of the bar you are eligible to sit in a reserved section of the Courtroom. To attend an oral argument, members must register at the bar registration desk located near the John Marshall Statue in the Lower Great Hall, ground level. The hours of the registration desk are from 9:00 a.m. until noon and 12:30 p.m. until Court adjourns. Seating is on a first come, first served basis. Your membership entitles you use of the public areas of the extensive law library located on the third floor. The telephone number for the library is 202-479-3173.

For further information on the Court, please visit the Supreme Court web-site, [www.supremecourt.gov](http://www.supremecourt.gov).

If my office can assist in any way, we will be glad to do so.

I extend to you a warm welcome as a member of the Bar and an officer of the Court.



William K. Suter  
Clerk

# Exhibit T



|  |                         |                              |  |
|--|-------------------------|------------------------------|--|
| Page: 001  | Report Date: 05/16/2020 | Agency: TROOP 4 STATE POLICE | Complaint Number: 04-20-028917   |
| Reported Date and Time: Wed 05/13/2020 1151  |                         | Field Service Report         | Occurred: Wed 05/13/2020 1151  |
| Location: 34012 Shawnee Dr, Dagsboro, DE 19939<br>0.10 Miles Southwest of Trails Rd          |                         |                              |  |
| City: 202 - 074  | Sector: 44              | County: Sussex               | Domestic Related: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No        |
|  |                         |                              | Gen Broadcast Sent?: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No     |
|  |                         |                              | Camp Related?: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No           |
|  |                         |                              | Gen Related?: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No            |
| Officer Weapon Involved: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Officer Weapon Type:    | Officer Weapon Use:          | Emergency Order Related: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

**Crimes and Associated Information**

|  |                |                                 |  |
|--|----------------|---------------------------------|--|
| Victim Number: 000   | Crime Seq: 001 | Status:                         | Crime Description:   |
| Location of Offense:   |                | Status:                         | Involvement: <input type="checkbox"/> Alcohol <input type="checkbox"/> Drugs <input type="checkbox"/> Computer |
| General Offense:   |                |                                 |  |
| Suspected Hate Bias: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No - N/A |                | Crime Code: 8105 - Non-Criminal |  |

**Witness Information**

|  |                        |                       |                                |             |             |        |
|--|------------------------|-----------------------|--------------------------------|-------------|-------------|--------|
| Sequence: 001  | Type: Reporting Person | Name: KELLY, MEGHAN M | Sex: Female                    | Race: White | Age:        | D.O.B: |
| 34012 Shawnee Dr<br>Blackwater Vlg<br>Dagsboro, DE 19939 |                        |                       | Home Telephone: (772) 332-9719 | Cell Phone: | Work Phone: |        |
| Sequence: 002  | Type: Person Contacted | Name:                 | Sex:                           | Race:       | Age:        | D.O.B: |
| [Redacted]   |                        |                       | Home Telephone:                | Cell Phone: | Work Phone: |        |

**Investigative Narrative**

On May 13, 2020 at approximately 1151 hours, I was dispatched to respond to 34012 Shawnee Drive Dagsboro Delaware in reference to a non criminal complaint. Upon arrival, I made contact with RP-Meghan Kelly who advised me that she put up political signs in her yard which face the roadway. RP-Meghan explained that she had written authorization from the HOA president that she could place the signs in her yard. When RP-Meghan placed a large banner in her front yard, she was confronted by her neighbor [Redacted]. RP-Meghan advised me that PC [Redacted] yelled at her and told her to take the sign down because it was disgusting.

I made contact with PC [Redacted] at his residence across the street from RP-Meghan's residence. PC [Redacted] said that RP-Meghan is crazy and he hated her signs because they were a disgrace. I advised PC [Redacted] that he needed to ignore RP-Meghan and any political signs she puts up in her yard. PC [Redacted] acknowledged my request and advised me that there would be no further issue today. No further police action was taken by this department.

*Dep. Inv. of Elections Vol 116A*

|   |   |
|---|---|
| Reporting Officer: CPL/I KLAHR - 91449 0  | Supervisor Approval: Michael J Trestka PSPT433 05/18/2020 |
| Detective Notified:   | Referred To:  |
| Solvability: <input type="checkbox"/> Witness <input type="checkbox"/> M.O. <input type="checkbox"/> Trace Stolen Property <input type="checkbox"/> Suspect Named                   | Status: Closed  |
| <input type="checkbox"/> Suspect Located <input type="checkbox"/> Suspect Described <input type="checkbox"/> Suspect Identified <input type="checkbox"/> Suspect Vehicle Identified |   |

# Exhibit U

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Home » Project Americana

# Project Americana

## Man In Society

The text and drawings on page 6 were prepared exclusively for FEEDBACK by Jacque Fresco — engineer, architect, social scientist. Aside from his masterful drawing style, Fresco’s visualizations generate sheer power mainly because of their startling reality.

According to Fresco, the scientist of today is involved in a conflict between two value systems: 1 The orderly world of scientific methodology; 2 The non-scientific culture (and language) which surrounds him on all

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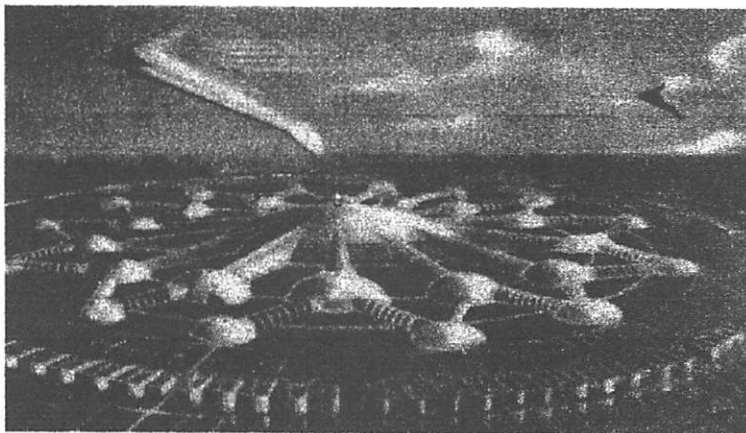
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achievement.

Fresco is currently attempting to systematically evaluate the forces that are shaping our destiny, a destiny in which he envisions socially integrated computers which will determine the most favorable decisions in the conduct of human affairs, machines more than human that will accelerate science and government to the highest levels of efficiency, millions of electronic social servants that will control the production and distribution of goods and services, and devices that will serve man in medicine and agriculture to help him attain a dynamic equilibrium between himself and his environment.

This is not the world of tomorrow of the science fiction writer. Page 6 is a look at the world as it is being shaped today, a world dedicated to the well being of the individual and his relationship to society; a world that is certainly inevitable, barring catastrophic war.



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to work out the maximal decision in the conduct of human affairs through the application of statistical mechanics related to the needs of man, such as: agriculture production, atomic and hydro-electric power production, and the distribution of goods and services.

It will automatically record, store, and modify information in terms of minimum expenditure of energy for maximum social gain. The information it will provide will assist us in working out the many problems of a highly complex technological system. It will provide us with a library of data undreamed of in our present culture. It will enable us to predict the next most probable need and recommend solutions to determine our future through the erection of scientific scales of performances.

## The New City

Tremendous changes in our



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government. They will be faced with a super-human task to provide new techniques for mass production on a vast scale. Transportation systems will be relocated and redesigned to accommodate changes in population centers. These changes will have profound effects upon the development of this centralized civilization. Science; engineering; and technology will come into sharp focus. Machines and engineering systems of this kind will have a greater effect within the next 15 years than all of the political bickering of the world's past history. The present world, long sterile in its methodology, coupled with its verbal inadequacies and its socially medieval philosophy, is rapidly crumbling and giving way to the embryonic forces and pressures of a new age. The demand will continue at an accelerated rate, bypassing and leaving behind cultures and individuals unable to grasp the significance of organized science.

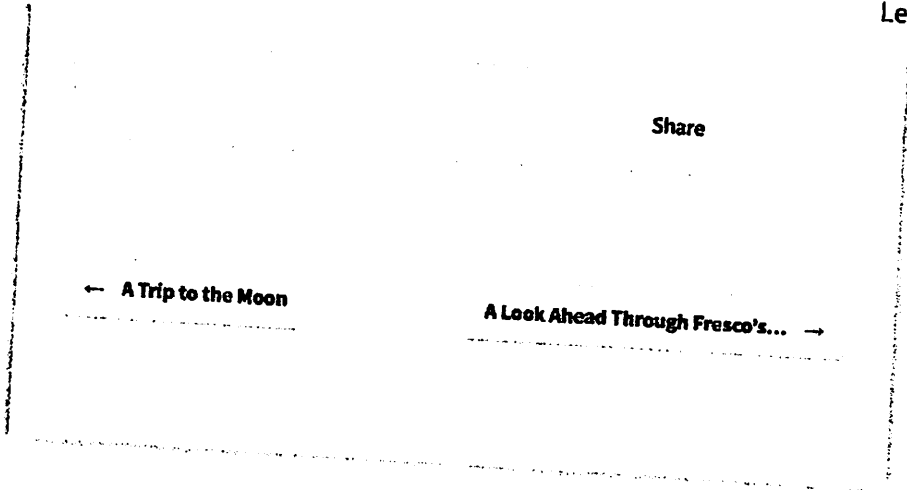
In the reconstruction of education, the radial schools will be based on the design of the most useful structure to accomplish a given task. The new schools will be experimental laboratories to further the development of educational systems dedicated to social sanity. This vast undertaking will emphasize the highest respect for human freedom and dignity, both here and throughout the world. By redefining human behavior in technical terms through systematic observation and experimentation, thus adapting man to the new

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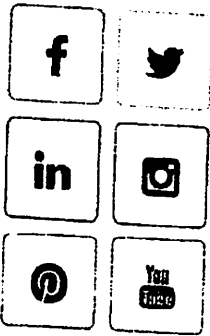
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# WIKIPEDIA

## The Venus Project

The **Venus Project** is a nonprofit organization founded by a Florida-based, architect and social engineer Jacque Fresco.<sup>[1]</sup> Fresco with his partner Roxanne Meadows founded this organization with a socioeconomic model to develop a resource-based economy for human beings utilizing technology.<sup>[2]</sup>

### History

Fresco worked on the "Project Americana" before The Venus Project, from 1955 to 1959. The project was mainly about environmental, traffic, and floodgates concerns.<sup>[3][2]</sup>

In 1970, Fresco formed an organization, Sociocybereneering Inc, based on the idea of technology and energy conservation strategies. Later, Fresco and his partner Roxanne Meadows purchased 21 acres of farmland in Venus, an unincorporated community in southeastern Highlands County, Florida for conducting different types of research about their futuristic plan of architectural design and city models.<sup>[4][3]</sup> Fresco & Meadows then created buildings and other infrastructure to work on their idea of energy-efficient cities. According to *The New York Times*, initially, they supported the project by selling books and lecture videos. In 1980, Fresco, established a research center to experiment on resource-based economy and later named it, "The Venus Project", by a town name, Venus.<sup>[5]</sup> In 2010, Fresco and Meadows traveled to 20 countries to present "The Venus Project".<sup>[6]</sup> In June 2012, a Swedish documentary and fiction director, *Maja Borg* screened her film, *Future My Love*, at the Edinburgh International Film Festival featuring the work of Fresco and Roxanne Meadows.<sup>[7]</sup>

### The Venus Project

|                   |   |
|-------------------|---|
| <b>Founded</b>    | April 6, 1985   |
| <b>Founder</b>    | Jacque Fresco   |
| <b>Type</b>       | Not-for-profit  |
| <b>Location</b>   | Venus, Florida  |
| <b>Key people</b> | Roxanne Meadows   |
| <b>Website</b>    | <a href="https://www.thevenusproject.com/">https://www.thevenusproject.com/</a> |

### References

1. "Venus project - redesigning the future" (<https://www.bbc.co.uk/news/technology-23799590>). *BBC News*. 25 August 2013.
2. Sandomir, Richard (25 May 2017). "Jacque Fresco, Futurist Who Envisioned a Society Without Money, Dies at 101" (<https://www.nytimes.com/2017/05/24/us/jacque-fresco-futurist-who-envisioned-a-society-without-money-dies-at-101.html>). *The New York Times*.
3. "Floating Cities and Resource-Based Economies" (<https://news.co.cr/floating-cities-and-resource-based-economies/2954/>). *Costa Rica Star News*. 27 February 2012.
4. "Eliminating Money, Taxes, and Ownership Will Bring Forth Technoutopia" (<https://www.vice.com/en/article/53dkez/eliminating-money-taxes-and-ownership-will-bring-forth-technoutopia>). *www.vice.com*.
5. "NBC2 explores The Venus Project: 'What the future could be like' " (<https://nbc-2.com/nbc-2-wbbh/2019/12/19/nbc2-explores-the-venus-project-what-the-future-could-be-like/>). *NBC2 News*. 19 December 2019.
6. "The Venus Project" (<https://web.archive.org/web/20100424073541/http://www.thevenusproject.com/>)



t.com/index.php). 24 April 2010. Archived from the original (<http://www.thevenusproject.com/index.php>) on 24 April 2010.

7. Adams, Mark; critic2012-06-22T09:09:00+01:00, chief film. "Future My Love" (<https://www.screendaily.com/future-my-love/5043649.article>). *Screen*.

## External links

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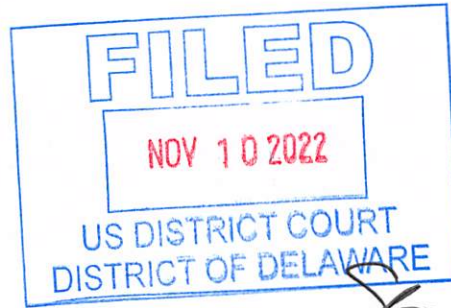
- The view from Venus (<https://www.orlandoweekly.com/orlando/the-view-from-venus/Content?oid=2248863>)
- 

Retrieved from "[https://en.wikipedia.org/w/index.php?title=The\\_Venus\\_Project&oldid=1111563519](https://en.wikipedia.org/w/index.php?title=The_Venus_Project&oldid=1111563519)"

This page was last edited on 21 September 2022, at 17:10 (UTC).

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# Exhibit B



SUPREME COURT OF PENNSYLVANIA

|                           |   |                                     |
|---------------------------|---|-------------------------------------|
| IN THE MATTER OF A MEMBER | § | No. 2913 DD3                        |
| OF THE BAR                | § | No. 118 DB 2022                     |
|                           | § | (Supreme Court of Delaware, No. 58, |
|                           | § | 2022)                               |
| MEGHAN M. KELLY,          | § | Attorney Registration No. 202268    |
| Respondent.               | § | (out of state)                      |

**Respondent’s Motion to dismiss the disciplinary proceeding, without prejudice for lack of subject matter jurisdiction**

I, Respondent Meghan M. Kelly move this court to dismiss this action, without prejudice, for want of subject matter jurisdiction.

1. No statutory authority exists under Pennsylvania Disciplinary Board Rules and Procedures (hereinafter “PA-Rules” or “PA-Rule”) which grants this Honorable Court subject matter jurisdiction over my person or property interest at this time.

2. This Court has jurisdiction over respondent-attorneys. PA Rule § 85.2 defines “Respondent-attorney Includes any person subject to the Enforcement Rules (See § 85.3(a) (relating to jurisdiction))”

3. PA-Rule § 85.3 (a)(1) provides: “(a) General rule. Enforcement Rule 201(a) provides that the exclusive disciplinary jurisdiction of the Supreme Court and the Board under the Enforcement Rules extends to:(1) Any attorney admitted to practice law in this Commonwealth.”

4. I am not admitted to practice law in this Commonwealth.

5. I resigned from the Pennsylvania state Bar and the Eastern District Court of Pennsylvania, District Court.

6. I am not practicing law in Pennsylvania, and retired my licenses in the federal District Court and state Court.

7. I am no longer admitted to practice law in Pennsylvania or before this Court.

8. I have not paid active bar dues as required to maintain my license.

9. There is no subject matter for which this Court may discipline me on at this time.

10. Should I seek reinstatement to this bar, Pennsylvania Disciplinary Counsel (herein referred to as "PA-ODC") may consider reciprocal discipline at that time.

11. I am without a PA license to practice law since I resigned.

12. I did not understand why many state rules prohibited lawyers, including me from going inactive or retired when facing discipline until I received a letter from DC Disciplinary Counsel, I attach hereto as Exhibit 1. (See, In the Matter of Ngobeni, 453 Mass. 233, 241 n.3 (Mass. 2009) "Many state "bar discipline rules, like ours, do not permit an attorney to resign ")

13. The Rules in Delaware, and other states prohibit going inactive or retired when facing discipline in order to compel forced subject matter jurisdiction.

14. I cried with relief upon reading the letter I attach hereto as Exhibit 1, thinking William R. Ross, DC Disciplinary Counsel bestowed a great kindness. Upon stepping back and reviewing the rules, I discovered DC Disciplinary Counsel was merely adhering to the rules.

15. The PA-Rules do discuss limited jurisdiction over retired attorneys. This jurisdiction does not apply to me. I retired from the PA Bar before I filed a law suit against former Donald J. Trump ("Trump") in the Delaware Courts to dissolve the establishment of government religion created by a course of conduct by Trump I outlined in my pleadings before

the Delaware Courts. The Delaware Supreme Court indicates my citations to the Bible and my religious beliefs contained in the petition are the source of their discipline. Please see the Petition at paragraph number 7, and the August 23, 2022 letter by DE Disciplinary Counsel indicating my religious-political petitions in Kelly v Trump as the source of their concern about my “mental fitness” and initiation of discipline against me. (Exhibits 2, 3).

16. PA-Rule § 85.3 (3) provides this Court has jurisdiction over,

**“Any formerly admitted attorney, with respect to acts prior to ... transfer to or assumption of retired or inactive status, or with respect to acts subsequent thereto which amount to the practice of law or constitute the violation of the Disciplinary Rules, the Enforcement Rules or these rules.” (Emphasis intended)**

17. Since the reciprocal conduct PA-ODC seeks to discipline me on by moving the Court for a reciprocal order occurred after I resigned as a member of this Bar, this Court does not have subject matter jurisdiction to discipline me.

18. PA-Rule § 85.3 (3) (5) provides this Court has jurisdiction over “Any attorney who resumes the practice of law.”

19. Accordingly, this Court does not have subject matter jurisdiction to place me on reciprocal discipline.

20. Should I move this Court to reinstate my license to practice law before this forum, then PA-ODC may if applicable, but is not required to seek reciprocal discipline at that time.

21. I am seeking to overturn the original Delaware disciplinary adjudication on appeal to the US Supreme Court and a civil rights case before the Delaware District Court.

22. So, I hope the issue will be moot by the time I seek to reinstate my license, if I seek to reinstate my license before this Honorable forum.

23. The Pennsylvania Supreme Court in *Roberts v. Martorano*, 427 Pa. 581, 584 (Pa. 1967) held even without a motion this Court:

“may still dismiss this appeal for jurisdiction may not be conferred by the parties where none exists, *Commonwealth v. Yorktowne Paper Mills, Inc.*, 419 Pa. 363, 214 A.2d 203 (1965), and this Court may raise a jurisdictional defect sua sponte. *See Barco, Inc. v. Steel Crest Homes, Inc.*, 420 Pa. 553, 218 A.2d 221 (1966).

24. This Court must dismiss PA-ODC’s appeal to place my resigned license on disability inactive. There is no license to restrict me on at this time. I resigned. I am without license or permission to practice law before this Honorable jurisdiction at this time. There is no subject matter to further restrain.

25. On an aside, I asked PA-ODC’s position. He did not have much time to respond. I thanked him too because his arguments helped me maintain my action in the federal Court. If I am able to do anything good with my Delaware license to practice law it is because Anthony Sodroski, Esq. gave me help and guidance. I thank him. (Exhibit 4)

Wherefore, I pray this court grants this motion.

November 6, 2022

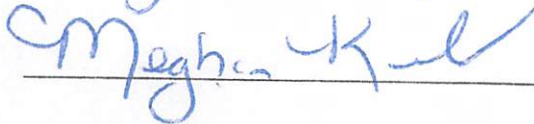
Respectfully submitted,

/s/Meghan Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com) (302) 493-6693  
Retired Bar No. 202268, INACTIVE, not practicing  
law on behalf of another

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

Dated: November 6, 2022

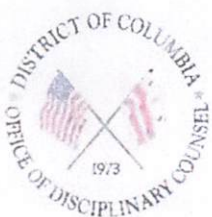
Meghan Kelly (printed)

 (signed)

Filed 11/6/2022 1:56:03 PM Supreme Court Western District  
2913 DD3

# Exhibit 1





## OFFICE OF DISCIPLINARY COUNSEL

Hamilton P. Fox, III  
*Disciplinary Counsel*

Julia L. Porter  
*Deputy Disciplinary Counsel*

*Senior Assistant Disciplinary Counsel*  
Myles V. Lynk  
Becky Neal

*Assistant Disciplinary Counsel*  
Caroll G. Donayre  
Jerril U. Dunston  
Dru Foster  
Jason R. Horrell  
Ebtelaj Kalantar  
Jelani C. Lowery  
Sean P. O'Brien  
Joseph C. Perry  
Melissa J. Roiffiot  
William R. Ross  
Traci M. Tait  
Cynthia G. Wright

*Senior Staff Attorney*  
Lawrence K. Bloom

*Staff Attorney*  
Arquimides R. Leon  
Amanda Ureña  
Angela Walker

*Manager, Forensic Investigations*  
Charles M. Anderson

*Investigative Attorney*  
Azadeh Matinpour

November 1, 2022

### CONFIDENTIAL

Meghan M. Kelly  
34012 Shawnee Drive  
Dagsboro, DE 19939

Re: *In re Meghan M. Kelly*  
DDN 2022-D157

Dear Ms. Kelly:

The Office of Disciplinary Counsel docketed this matter for investigation upon learning of your transfer to disability inactive status in Delaware. I have also reviewed your letter to the D.C. Court of Appeals, which you forwarded to me, requesting a ruling that you have a fifth amendment right against self-incrimination that supersedes any obligation to self-report the Delaware order in this jurisdiction. We do not have jurisdiction over this matter because you resigned from the Bar of the District of Columbia Court of Appeals on October 2, 2017. Accordingly, we are dismissing this matter without prejudice to reopening our investigation should you seek reinstatement in this jurisdiction in the future. Prior to reinstatement, you would need to be reinstated in all other jurisdictions that had previously disciplined you or placed you on disability status.

We trust that this letter adequately advises you of the basis of our decision to terminate our investigation and to dismiss this matter without prejudice.

Sincerely,

s/William R. Ross  
Assistant Disciplinary Counsel

WRR/his

■ *Serving the Community and Upholding the Integrity of the Bar* ■

OFFICE OF DISCIPLINARY COUNSEL

515 5th Street, N.W., Building A, Room 117  
Washington, DC 20001

CAPITAL DISTRICT 208

1 NOV 2022 PM 2 L

REPOSTAGE

1.000.57

PERSONAL AND CONFIDENTIAL

Meghan M. Kelly  
34012 Shawnee Drive  
Dagsboro, DE 19939

19939-412512



# Exhibit 2

6. In September 2020, Respondent filed a lawsuit in the Court of Chancery of Delaware against former-President Donald Trump: *Meghan Kelly v. Donald Trump*, Case No. 2020-0809 (September 21, 2020). The Court of Chancery dismissed Respondent's complaint. Respondent appealed to the Supreme Court of Delaware, which affirmed the Court of Chancery. On August 23, 2021, Respondent filed a writ of certiorari with the Supreme Court of the United States.

7. The factual averments, argument, and other content in Respondent's filings in the Delaware courts, raise serious concerns regarding her mental capacity to practice law. Respondent's statements and arguments: lack focus and clarity; are objectively illogical; and rely on non-legal sources, including the Bible, instead of appropriate legal authority. The following excerpts demonstrate, by way of example only, Respondent's apparent inability to make cogent, rational legal arguments:

13. The President's words and conduct supporting religion, as discussed below, were accepted as truth by many, thereby, instilling the belief, supporting the President's perceived thinking or conduct or his candidacy, despite all of his sinful misbehavior and in a way supporting his sins, as excusable without confession or without repentance, is supporting God, when I believe sinfully doing your own will leads to damnation. (Mark 8:34, "Whoever desires to come after Me, let him deny himself (meaning not doing their own will, their own selfish, sinful desires, but exercise self-discipline, using their mind, their brain, which is their free will to do God's will, love), and take up his cross, and follow Me (by love in truth, not lusts in deception)."); Also see, (Matthew 16:24, Luke 9:23 regarding the same message of personal sacrifice to follow Jesus).

My religious beliefs are the reason this petition is brought.

# Exhibit 3

**Office of Disciplinary Counsel**  
SUPREME COURT OF THE STATE OF DELAWARE

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

DAVID A. WHITE  
Chief Disciplinary Counsel

PATRICIA BARTLEY SCHWARTZ  
Disciplinary Counsel

KATHLEEN M. VAVALA  
Disciplinary Counsel

August 23, 2021

CONFIDENTIAL  
VIA EMAIL & U.S. MAIL

[Meghankellyesq@yahoo.com](mailto:Meghankellyesq@yahoo.com)

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

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

Dear Ms. Kelly:

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

Under Rule 9(a) of the Delaware Lawyers' Rules of Disciplinary Procedure, the ODC "shall screen and evaluate all information coming to its attention by complaint or otherwise concerning possible misconduct by or incapacity of a lawyer." Procedural Rule 19 (c) provides "Information relating to a lawyer's physical or mental condition which adversely affects the lawyer's ability to practice law shall be investigated by the ODC. If there are reasonable grounds to believe the interests of respondent's clients or the public are endangered, such information shall be the subject of formal proceedings to determine whether the respondent shall be transferred to disability inactive status. The procedures and hearings shall be conducted in the same manner as disciplinary proceedings. The Board may take or direct whatever action it deems necessary or proper to determine whether the respondent is so incapacitated, including the examination of the respondent by qualified medical experts at the respondent's expense. If, after reviewing the recommendation of the Board and upon due consideration of the matter, the Court concludes that the respondent is incapacitated from continuing to practice law, it shall enter an order transferring the respondent to disability inactive status for an indefinite period and until further order of the Court."

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

# Exhibit 4

## 2913 DD 3 (PA-ODC's stance on motion to dismiss for want of jurisdiction)

From: Meg Kelly (meghankellyesq@yahoo.com)  
To: anthony.sodroski@pacourts.us; meghankellyesq@yahoo.com  
Date: Sunday, November 6, 2022 at 11:50 AM EST

Hi Anthony Sodroski, Esq.

Given the immediate irreparable injury to me in terms of needless obstacles preventing me access to the US Supreme Court and civil rights proceedings to defend my life, liberty and eternal life I write on the weekend.

Could you please provide your position on a motion to dismiss for want of jurisdiction?

Thank you for your kind consideration. Have a good night.

On an aside, I thank you. If it weren't for you I may not have won my appeal to the Third Circuit, but will win it because of you. You indicated the state of Delaware's proceeding was over. So, the Delaware District Court's dismissal under Younger was moot. If I am able to do any good with my Delaware license it is because of you.

I saw you went to Duquesne Law School too, and you may have a kid at Duquesne. My mom and dad and aunts and my Uncle Luke Kelly went there too.

My Grandpop, "Battleship Bob" was a public defender in Pittsburgh. Attached, please find his plaque. I put it on a photocopy machine and literally copied it.

My Grandpop Robert Kelly was a marine. His captain had pity on him and sent him to Yale for undergrad. My grandpop was the only one who remained alive. He went to Yale not because he was smart, but because his superior was kind. My Grandpop went to Yale with President Bush Senior. Grandpop said Bush was a "jackass." He put others down and acted better than, and said jokes that were not funny.

My grandpop died when I was young but he was a God man. He once cried in court because of the cruelty of a judge. I see that as strength to care for the least of these, not weakness. But what God sees as strength is different than this world sees.

My other relative by affinity not blood was counsel to the Republican party, Mark Braden Esq. I often visit his wife at their family's beach house minutes away McKayla Braden. She is not happy whenever I share that story about President Bush because she loves President Bush Senior.

Yet, our freedom to speak on why we respect others should be protected. I do not respect the disrespect President Bush Senior showed for my grandpop or others at Yale, or elsewhere. Leaders should lift up and care for the people, not put them down, or oppress to subjugate them.

I will never be in government. When my faith in Jesus was attacked, I let go of drafting more just laws and clung onto my faith in Jesus for mere life.

I do not mean to offend you. Nevertheless, offensive beliefs and speech <sup>is</sup> protected or should be protected from government retaliation or persecution so we may learn form one another.

I am quite scared. Thank you for bestowing kindness and direction, regardless of intent. You helped me.

Very truly,  
Meg  
Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939  
(302) 493-6693



meghankellyesq@yahoo.com  
Retired Inactive 202268



Grandpop kelly.jpg  
628.8kB

ROBERT KELLY

ASSISTANT PUBLIC DEFENDER

A SOURCE OF INSPIRATION

ALL PUBLIC DEFENDERS

# Exhibit C

SUPREME COURT OF PENNSYLVANIA

|                           |   |                                     |
|---------------------------|---|-------------------------------------|
| IN THE MATTER OF A MEMBER | § | No. 2913 DD3                        |
| OF THE BAR                | § | No. 118 DB 2022                     |
|                           | § | (Supreme Court of Delaware, No. 58, |
|                           | § | 2022)                               |
| MEGHAN M. KELLY,          | § | Attorney Registration No. 202268    |
| Respondent.               | § | (out of state)                      |

**Respondent Meghan Kelly’s Addendum to  
Respondent’s Motion to dismiss the disciplinary proceeding, without  
prejudice for lack of subject matter jurisdiction**

I, Respondent Meghan M. Kelly move this court to include this addendum to my motion to dismiss this action, without prejudice, for want of subject matter jurisdiction.

1. On November 6, 2022, I emailed opposing counsel a copy of Respondent’s Motion to dismiss the disciplinary proceeding, without prejudice for lack of subject matter jurisdiction, and submitted it to this Honorable Court.

2. This Honorable Court accepted the filing dated as of November 6, 2022.

3. I am attempting to file a Motion to Dismiss in another forum due to lack of subject matter, the District Court for the Eastern District Court of PA.

4. That Court has scheduled a hearing, without rendering Orders on my Motions for reargument on its denial of a stay or my motion to exempt costs in order 1. not to compel me to violate my religious beliefs in exchange for defending

my exercise of First Amendment rights before that forum, 2. Cause an undue obstacle to my access to other courts, and 3. Cause an obstacle to its own court based on the substantial burden of poverty and government threat of loss on the opportunity to defend my license and person by forced religious violations.

5. On Friday November 3, 2022, upon receipt of the notice of hearing I filed motions to be heard on outstanding motions necessary in preparing for any hearing.

6. Those two filings were misfiled as attachments to a letter I sent that same day where I requested clarification and specific notice on the subject matter of the hearing.

7. Exhibits to other filings remain out of order, and render it so tedious for that Honorable Court to look through as to make it a violation of my opportunity to be heard should it not be corrected by the District Court for the Eastern District of PA. So, I am working on this to my detriment of not working on more urgent matters. (Exhibits 1-12)

8. I face irreparable injury in that I must file two appeals to the US Supreme Court which reciprocal suits interfere with by time and resources, making it an obstacle to my access to another court in defense of my first amendment rights of religious, belief, exercise, speech, association and the right to my

Delaware license to practice law without fanciful government obstruction and retaliation but for the exercise of my Constitutional rights based on religious-political animus and poverty animus, in violation of the equal protections clause applicable to the states through the 14<sup>th</sup> Amendment and the Federal Government through the 5<sup>th</sup> Amendment equal Protections Component.

9. I have unique political and religious beliefs. I disagree with United States Supreme Court Justice Gorsuch. I skimmed his book *A Republic, If You Can Keep*, by Neil Gorsuch, published September 10, 2019.

10. I disagree with Justice Gorsuch. I disagree with Plato too.

11. I think Justice Gorsuch is misguided by Plato's theories. It is not necessary for me to outline the theories I respectfully and strongly disagree with. However, it is necessary for me to outline why we have a Democratic-Republic, not a mere Republic. I believe attorneys have a duty, should they have standing to correct the courts when they are misguided to serve business greed at the expense of sacrificing a no longer free, but for sale people, and individual liberties.

12. We have a Democratic-Republic where two branches give us a republic in the form of representation by the vote, the executive and legislative branches, and one branch gives us freedom and democracy, the courts.

13. The Courts are special in that they safeguard individuals and individual liberty from being sacrificed to the mob reign of lawless lusts, by placing Constitutional limits on the laws and the enforcement of the laws.

14. The Courts misbehave when they cry political question which allows the other two branches to kill, steal and destroy liberty and life unrestrained by the just rule of law.

15. People I love would disagree with me indicating the state law makers should draft or enforce laws to accommodate their unique culture. I argue this potentially allows individual states and local governments to be above the constitution, should the argument political question be pled by US Supreme Court justices.

16. Delegating authority unrestrained by the Constitutional limits allows states and state backed private and foreign partners to be above the law. It specifically allows businesses to be above the law by allowing Boards in each state which include the professionals to make their uniform practices to be the letter of the law, by making it the standard judges defer to as opposed to the Constitutional limits to protect life and liberty.

17. The vote is not what gives us freedom. It is you, the judges and judges in other courts who give us freedom.

18. When I ran for office in 2018 members of my political party pointed to election concerns, we have today. Listening to speakers and reading through material from the World Economic Forum or its founder or speakers at the World Government Summit have led me to believe they are not smart, but conniving. When they predict it, I believe they actually plan it in their agendas. In their agendas they specifically allude to eliminating lawyers, which may be construed to eliminate judges too.

19. Everything standardized is uniquely in danger of becoming automated. Automation cannot replace judges who think outside the standards to adapt to individual cases and individual exercise of rights. Courts must protect equal protections under the law which is the opposite of conformed same standardization. Courts are our only hope of safeguarding individual freedoms to believe by the dictates of one's own conscience, to live by exercise of such beliefs, and other freedoms relating to the beliefs. This includes protecting private nongovernment speech and association based on one's own beliefs. This also includes allowing people like me to associate as a Christian, not conforming to the world by allowing me to keep myself separate from compelled sin. (See, Romans 12:2, "Do not conform to the pattern of this world, but be transformed by the renewing of your mind. Then you will be able to test and approve what God's will is—his good, pleasing and perfect will.).



20. I must appeal to a United States Supreme Court who believes and thinks very differently than I do. It makes it difficult for me to persuade a court that sees money and government backed business through Boards of Professional Conduct and otherwise, as freedom instead of slavery by artificial indebtedness and professions whose standards are the law instead of the Constitution and the law makers passed laws limited by the courts.

21. I write to include the attachment showing I have been retired my Pennsylvania license on May 12, 2018 per Exhibit 13. I actually thought I retired in 2021, but it appears I was incorrect. The Honorable Chief Deputy, John A. Vaskof, Esq. kindly forwarded this to me on November 7, 2022. I forwarded it to opposing counsel.

22. Today, the Chief Deputy, John A. Vaskof, Esq. also kindly confirmed my PA license to practice law was placed on inactive status on or about July 1, 2017.

23. I thank the Court for its help on gaining accurate information.

24. Pursuant to Pennsylvania's Rules of Disciplinary Enforcement Rule 301 (k) "As used in this rule, the term "disabled attorney" means an attorney transferred to inactive status under this rule."

25. Since, I was already placed on inactive status in 2017, and then resigned my license 2018, there is no license to further restrain by placing it on inactive. My license has remained retired since 2018.

Wherefore, I pray this court grants this motion to include an addendum to my Motion to Dismiss.

November 7, 2022

Respectfully submitted,

/s/Meghan Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)  
(302) 493-6693  
Retired Bar No. 202268, INACTIVE, not  
practicing law on behalf of another

# Exhibit 1

**Fw: (Contact Clerk's office to prevent misfilings and to aid in helping them Meg)Fw: 22-45 First Email IMO M. Kelly Letter to the Court**

**From:** Meg Kelly (meghankellyesq@yahoo.com)

**To:** anthony.sodroski@pacourts.us; zi-xiang.shen@delaware.gov; david.weiss@usdoj.gov; meghankellyesq@yahoo.com

**Date:** Friday, November 4, 2022 at 07:01 AM EDT

Good morning,

I do not want you to think I am sitting on matters. The exhibits to multiple motions were misfiled by the Eastern District Court of PA. Everything is a big mess.

Like the Board case in the DE proceeding the Board never gave me an opportunity to be heard on multiple motions, by 1. ignoring them never addressing them and in another case rendering a non appealable email order.

The Eastern District Court of PA appears to be evading rendering orders required to hear me on motions too. I do not waive the opportunity to be heard on the motions which are necessary prior to any hearing.

Everything is a big mess. I have not started the appeal because of this little foxes, the ancillary cases keep bogarting my time and resources. I cannot be compelled to waive opportunity to be heard by connived pressure in other forums to fix the proceeding by prejudicing me for their mere convenience of the governments, as opposed to safeguarding actual justice by asserting procedural due process safeguards.

I am quite stressed by the cost of materials and paper. Have you seen Walmart's paper went up 10 more dollars a box the last few month, for a total of 20 dollars more in less than one year. It is about 50 dollars a box. There is also no paper available at my local in store BJs. It is becoming more difficult to purchase paper due to planned scarcity and increase in prices.

These small stresses are quite big to me since I have no income and any resource I have is based on the love of my parents which I will pay back if capable. This is different than any worldly debt in that they would forgive it, no questions if I cannot afford to pay it back someday. Nothing I have is my own, not my car, which is my dad's too, even though it is in my name.

Thank you for considering caring about my dire situation.

On an aside, one of the exhibits misplaced in my exhibits is a medical file attached hereto. See these small things can material affect the outcome in my cases and other cases, and should be corrected not concealed.

Very truly,

Meg

Meghan Kelly

34012 Shawnee Dr.

Dagsboro, DE 19939

meghankellyesq@yahoo.com

(302) 493-6693

— Forwarded Message —

**From:** Meg Kelly <meghankellyesq@yahoo.com>

**To:** PAED\_Clerksoffice <paed\_clerksoffice@paed.uscourts.gov>; Meg Kelly <meghankellyesq@yahoo.com>

**Cc:** Gail Olson <gail\_olson@paed.uscourts.gov>

**Sent:** Friday, November 4, 2022 at 06:42:06 AM EDT

**Subject:** (Contact Clerk's office to prevent misfilings and to aid in helping them Meg)Fw: 22-45 First Email IMO M. Kelly Letter to the Court

Good morning,

On November 3, 2022, I filed three separate docket entrees with sub docket components.

The First is a letter, with attachments thereto, which should be uploaded with the email containing "First" immediately after the letter contained in the email below, chronologically to the email labeled with the word "Seventh," as the last exhibit to the letter.

The exhibits in my other filings are out of order, which prejudices me. There is also someone else's filings in my exhibits. I alerted the court about the misfiling of exhibits in a letter. I also sent Gail Olson emails last month. She has not responded to my emails yet.

After more urgent matters in my other cases, if necessary, I will likely file a motion to correct filings so it does not deny my Due process opportunity to be heard since neither the Court nor Gail Olson informally addressed my concerns.

It is important to file the letter and exhibits in correct order.

On November 3, 2022, I also filed two motions, each contained in one email, unlike the letter filing with separate emails containing exhibits as attachments.

However, I incorporate by reference the letter, and each of the exhibits, which are the attachments to the letter, in one of the motions in their entirety. I am relying on the exhibits for my case. It is important that I refer the court to the exhibits. If they are misfiled the court can not see or hear my defense.

Please contact me if you have any difficulty chronologically uploading the exhibits, oldest first, newest last.

Thank you for your help. I hope you have a great day.

Very truly,  
Meg  
Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
(302) 493-6693  
Retired inactive

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

**From:** Meg Kelly <meghankellyesq@yahoo.com>  
**To:** paed\_documents@paed.uscourts.gov <paed\_documents@paed.uscourts.gov>  
**Cc:** Meg Kelly <meghankellyesq@yahoo.com>  
**Sent:** Thursday, November 3, 2022 at 05:45:51 PM EDT  
**Subject:** 22-45 First Email IMO M. Kelly Letter to the Court

Good evening,









Could you please file this in 22-45. It is a letter for the Honorable panel Chair.

I am sending what I filed in the PA Supreme Court as exhibits to this letter in a series of emails. Please feel free to contact me if you have any questions or concerns. Please file this first.

I have not had an order on my motion to waive costs in order for this Court not to compel me to violate my religious beliefs in exchange with my access to the courts. I do not waive my right to be heard on that too before a hearing. I am seeking clarification on the subject matter of the hearing.

Thank you.  
Meg  
Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939

meghankellyesq@yahoo.com  
(302)493-6693

-  Letter dated November 3, 2022 by Meg Kelly.pdf  
1.2MB
-  DI 12-45 email motion to extend.pdf  
110.5kB
-  DI 12-47 Emergency care.pdf  
565.7kB
-  DI 13 letter prejudice.pdf  
32kB
-  13-3 Exhibit A-F.pdf  
306.1kB
-  DI 13-2 Ex BB.pdf  
106kB
-  DI 13-1 Ex CC.pdf  
402.2kB
-  DI 13-5 email.pdf  
119.4kB

# Exhibit 2

**MEGHAN MARIE KELLY, ESQUIRE**

34012 Shawnee Drive

Dagsboro, DE 19939

**The Honorable Judge and panel leader**

**Paul S. Diamond**

**Attn: Clerk of Court**

**Via Email**

**601 Market St Ste 16613,**

**Philadelphia, PA 19106**

**RE: In the Matter of Meghan Kelly/ Case 2:22-mc-00045 /**

November 3, 2022

Dear Honorable Judge Paul S. Diamond:

I am in receipt of Notice of a hearing. I am not in receipt of an Order on my motion for a rehearing on the Court Order denying request for ECF access, and Motion to Stay the proceeding until both my appeal to the original disciplinary proceeding and the civil rights proceeding is concluded. I invoke my 5<sup>th</sup> Amendment right for an opportunity to be heard on the Motion to protect my First Amendment liberties. I do not waive my right for an opportunity to be heard on that Motion and require an Order to preserve the issue for appeal should it be denied.

I do not have notice concerning the topic of the hearing. Is it on my motion for reargument?



I have not yet filed a for cause motion. So, it is not ripe for a hearing when I have not yet contested the order placing me inactive disabled.

I would be required to call all the Delaware Supreme Court judges, and Arline Simmons, a terminated court staff, Katrina Kruger another terminated court staff if it is not on the Motion for reargument.

I do not want to cause additional expenses on all parties when testimony may be given during the civil rights proceeding which is necessary for my defense of my license in your Court.

It is possible that I may not contest the proceeding in order not to prejudice my other cases should you agree not to report to the US Supreme Court.

If not, I move this Court to include the motion I filed with the PA Supreme Court today. You will see that the Delaware Supreme Court concealed 4 documents necessary and material to my defense the day the preliminary committee reviewed whether probable cause existed to bring the original discipline, November 3, 2021. This obviously prejudiced me by concealing evidence the Delaware Supreme Court itself instigated the Delaware disciplinary lawsuit for wrongful purposes to conceal its own misconduct.

Thank you for your guidance and consideration.

November 3, 2022

Respectfully,  
/s/Meghan Kelly  
Meghan Kelly, Esquire

34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
Retired Bar Number 202268

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

Dated: November 3, 2022

Meghan Kelly (printed)

Meghan Kelly (signed)

# Exhibit 3

MEGHAN MARIE KELLY, ESQUIRE

---

34012 Shawnee Drive  
Dagsboro, DE 19939

The Honorable Judge Paul S. Diamond  
Panel Chair  
United States District Court  
Eastern District of Pennsylvania  
James A. Byrne U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106

**RE: In the Matter of Meghan Kelly/ Case 2:22-mc-00045 /Filing/Duplicates in DI 10 and prejudicial manner of filing Docket Items 10, 11 and 12**

October 18, 2022

Dear Honorable Judge Paul S. Diamond:

I write concerning filing errors or issues for Docket Items (hereinafter DI) for DI 10, 11, and 12.

I sent Gail Olson the attached two emails regarding filing issues, but it appears she is out of the office until October 24, 2022. (Exhibits A, B, C, incorporated herein by reference). It is noticeable, I did not get an out of office response for my second email in spam or otherwise.

The manner in which my pleadings were filed prejudices me before this Honorable Court and panel. I am actually not done reviewing all the filings yet. I am still printing them out now. Yet in the interest of justice I must address some of the issues immediately in hopes to prevent prejudice towards me in this case.

I incorporate Docket Sheet for DI 10 as Exhibit D, Docket Sheet for DI 11 as Exhibit E, and Docket Sheet for Exhibit 12 as Exhibit F incorporated herein by reference.

I noticed there appeared to be some duplicates in DI 10. DI 39 and 41 appear to be the same. DI 43 and DI 48 appear to be the same. DI 44 and DI 49 appear to be the same. DI 45 and 50 appear to be the same. DI 46 and 51 appear to be the same. I do not understand how this happened. It appears the same emails may have been uploaded twice.

I bring this to your attention so you do not review the documents twice to conserve judicial resources.

I also noticed other filing errors place me in a disfavorable light before this honorable Court. The documents in DI 11 and DI 12 are filed out of order. The fact documents are not filed in chronological order prejudices me by making it inconvenient to you to look at the documents I refer to in my motion, possibly denying me the opportunity to be heard by rendering it too tedious for this Court to hear me.

The manner in which the documents are filed also prejudice me by placing the documents in a unfavorable manner to my case. In DI 12, the most negative document in my case appeared to be filed near the top of the exhibits, when I filed it after the ignored motions in chronological order.

I also noticed immediately, Exhibits 16 and 17 were uploaded without context. DI 12-4 and DI 12-5. Also Exhibits contained in the same email were filed quite far apart, which creates confusion of the facts. Attached, please find Exhibits BB and Exhibit CC, incorporated herein by reference. Exhibit BB indicates an issue initially, and Exhibit CC clarifies the issue as committing grave injustice, not a mere slight oversight. DI 12-8, DI-35.

I am not done printing out the documents or reviewing them. I must place this case aside as I was told another proceeding for discipline was expedited in bad faith to my response for a stay.

I am in immediate danger of irreparable injury. You may be contributing in placing me there should you deny my motion for rehearing on my motion for a stay to prevent violations to my constitutional rights.

Thank you for your guidance and consideration.

Respectfully,

October 18, 2022

/s/Meghan Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
Retired Bar Number 202268

# Exhibit 4

# Exhibit A



IMO M Kelly/22-45/filing/ Thank you

From: Meg Kelly (meghankellyesq@yahoo.com)

To: gail\_olson@paed.uscourts.gov

Cc: meghankellyesq@yahoo.com

Date: Tuesday, October 18, 2022 at 12:40 PM EDT

Good morning Gail,

I am noticing the documents in DI 11-12 are filed out of order. I am working through merely downloading DI 12. It is prejudicial to download Exhibit BB at DI 12-8 and Exhibit CC at DI at DI 42 when they are contained in the same email with relevant information.

I am so backed up with other cases. That I cannot resolve this now. I also saw duplicates of filings in DI 10.

This may be useful in arguing a motion for ECF and a waiver of Pacer fees down the line.

Yet, I am concerned about filing out of order as it may inconvenience the Judges or discourage them to piece through the exhibits to gather necessary review and consideration of the facts.

Is there anything I may do to make filing easier on you for the next motion to prevent confusion as to the order of the documents?

Thank you.

Have a good day.

Very truly,

Meg

Meghan Kelly

34012 Shawnee Dr.

Dagbsoro, DE 19939

meghankellyesq@yahoo.com

(302) 493-6693

Retired inactive 202268

# Exhibit B

**IMO M Kelly/22-45/filing out of order in DI 11 and 12/ and duplicates in DI 10**

**From: Meg Kelly (meghankellyesq@yahoo.com)**  
**To: gail\_olson@paed.uscourts.gov**  
**Cc: meghankellyesq@yahoo.com**  
**Date: Tuesday, October 18, 2022 at 12:46 PM EDT**

**Hi Gail,**

**I also saw documents were filed out of Order in DI 11. Please let me know if there is any way I can make it easier for you as to the order of the documents contained in the emails.**

**Thank you,  
Meg  
Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro,DE 19939  
(302) 493-6693  
Inactive Bar License Retired 202268**

# Exhibit C

**Automatic reply: IMO M Kelly/22-45/filing/ Thank you**

**From: Gail Olson (gail\_olson@paed.uscourts.gov)**

**To: meghankellyesq@yahoo.com**

**Date: Tuesday, October 18, 2022 at 12:40 PM EDT**

**I will be out of the office Monday, October 17th through Friday, October 21st, and will return on Monday, October 24th, I will respond to all email's on Monday. If you are trying to file something, please send your filing to PAED\_documents@paed.uscourts.gov to get filed.**

# Exhibit D

DI 10

**Document Selection Menu**

**Multiple Documents**

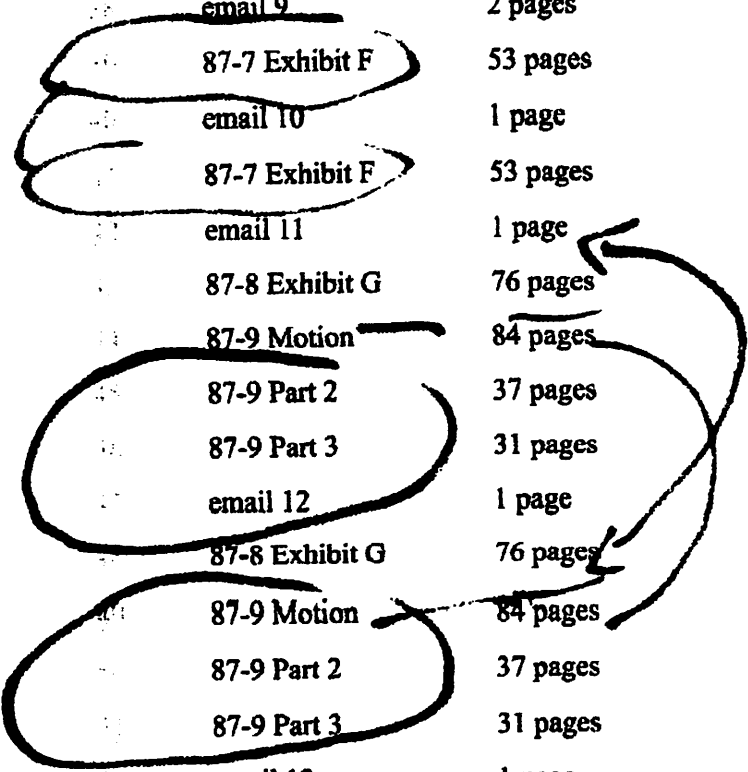
To view the main document and its attachments without incurring a PACER fee, click on the hyperlinks displayed on this menu. You may incur a PACER fee to view CM/ECF documents from hyperlinks within the documents.

Select the document you wish to view.

|    |                    |          |        |
|----|--------------------|----------|--------|
| 10 | Main Document      | 5 pages  | 2.3 mb |
| 11 | Letter             | 1 page   | 0.7 mb |
| 12 | Petition 7         | 1 page   | 0.8 mb |
| 13 | Email              | 1 page   | 109 kb |
| 14 | Appellant's motion | 15 pages | 199 kb |
| 15 | Exhibit 1          | 1 page   | 24 kb  |
| 16 | Exhibit 2          | 6 pages  | 205 kb |
| 17 | Exhibit 3          | 1 page   | 10 kb  |
| 18 | Exhibit 4          | 9 pages  | 323 kb |
| 19 | Declaration        | 1 page   | 19 kb  |
| 20 | May 28 order       | 1 page   | 115 kb |
| 21 | email 2            | 2 pages  | 151 kb |
| 22 | email 3            | 4 pages  | 169 kb |
| 23 | Appellant motion   | 14 pages | 146 kb |
| 24 | signed declaration | 1 page   | 22 kb  |
| 25 | Exhibit F          | 19 pages | 0.6 mb |
| 26 | Exhibit DELAP      | 3 pages  | 113 kb |
| 27 | DE Proposed Order  | 1 page   | 81 kb  |
| 28 | email 4            | 2 pages  | 138 kb |
| 29 | Opinion            | 10 pages | 302 kb |
| 30 | email 5            | 2 pages  | 136 kb |
| 31 | email 6            | 2 pages  | 136 kb |
| 32 | 582022 IMO         | 2 pages  | 11 kb  |
| 33 | email 7            | 2 pages  | 146 kb |
| 34 | Final Motion       | 9 pages  | 113 kb |

|    |                           |          |         |
|----|---------------------------|----------|---------|
| 18 | Declaration               | 1 page   | 222 kb  |
| 20 | Exhibit A email           | 2 pages  | 78 kb   |
| 22 | Exhibit B email           | 3 pages  | 116 kb  |
| 24 | Exhibit C email PA<br>ODC | 4 pages  | 112 kb  |
| 26 | Exhibit D email           | 6 pages  | 2.6 mb  |
| 28 | Exhibit E letter          | 15 pages | 4.8 mb  |
| 30 | Exhibit F email           | 11 pages | 4.0 mb  |
| 32 | Exhibit G email           | 4 pages  | 132 kb  |
| 34 | email 8                   | 2 pages  | 136 kb  |
| 36 | 87-3 Exhibit B            | 1 page   | 291 kb  |
| 38 | 87-4 Exhibit C            | 5 pages  | 1.6 mb  |
| 40 | 87-5 Exhibit D            | 5 pages  | 1.9 mb  |
| 42 | 87-6 Exhibit E            | 32 pages | 3.3 mb  |
| 44 | email 9                   | 2 pages  | 135 kb  |
| 46 | 87-7 Exhibit F            | 53 pages | 16.4 mb |
| 48 | email 10                  | 1 page   | 114 kb  |
| 50 | 87-7 Exhibit F            | 53 pages | 16.4 mb |
| 52 | email 11                  | 1 page   | 114 kb  |
| 54 | 87-8 Exhibit G            | 76 pages | 12.7 mb |
| 56 | 87-9 Motion               | 84 pages | 3.1 mb  |
| 58 | 87-9 Part 2               | 37 pages | 1.4 mb  |
| 60 | 87-9 Part 3               | 31 pages | 1.3 mb  |
| 62 | email 12                  | 1 page   | 115 kb  |
| 64 | 87-8 Exhibit G            | 76 pages | 12.7 mb |
| 66 | 87-9 Motion               | 84 pages | 3.1 mb  |
| 68 | 87-9 Part 2               | 37 pages | 1.4 mb  |
| 70 | 87-9 Part 3               | 31 pages | 1.3 mb  |
| 72 | email 13                  | 1 page   | 115 kb  |
| 74 | 87-10 Exhibit I           | 2 pages  | 1.0 mb  |
| 76 | 88-1 Motion               | 8 pages  | 114 kb  |
| 78 | Certificate               | 2 pages  | 0.6 mb  |

*2 times  
Same Exhibits  
4/2/24  
ZTM*





|             |           |         |
|-------------|-----------|---------|
| email 14    | 1 page    | 115 kb  |
| 87-9 Motion | 278 pages | 20.6 mb |
| email 15    | 1 page    | 114 kb  |
| email 16    | 2 pages   | 213 kb  |

# Exhibit E

Document Selection Menu

Multiple Documents

*DIW*

To view the main document and its attachments without incurring a PACER fee, click on the hyperlinks displayed on this menu. You may incur a PACER fee to view CM/ECF documents from hyperlinks within the documents.

Select the document you wish to view.

|               |                        |           |        |
|---------------|------------------------|-----------|--------|
| <u>11</u>     | Main Document          | 15 pages  | 103 kb |
| <u>1</u>      | Exhibit                | 1 page    | 225 kb |
| <u>2</u>      | Text of Proposed Order | 1 page    | 77 kb  |
| <u>3</u>      | Email#1                | 1 page    | 134 kb |
| <u>4</u>      | Appen2                 | 159 pages | 3.1 mb |
| <u>5</u>      | Appen4                 | 158 pages | 4.0 mb |
| <u>6</u>      | m to unseal            | 12 pages  | 134 kb |
| <u>7</u>      | declmseal              | 1 page    | 219 kb |
| <u>8</u>      | Ex.A                   | 12 pages  | 0.6 mb |
| <u>9</u>      | part5                  | 126 pages | 3.7 mb |
| <u>10</u>     | Exhibit                | 128 pages | 0.6 mb |
| <u>11</u>     | App1                   | 152 pages | 3.4 mb |
| <u>12</u>     | App3                   | 136 pages | 2.9 mb |
| <u>13</u>     | App6                   | 116 pages | 4.0 mb |
| <u>14</u>     | App7                   | 91 pages  | 2.8 mb |
| <u>15</u>     | certification          | 1 page    | 83 kb  |
| <u>16</u>     | Dec11 letter           | 9 pages   | 328 kb |
| <u>17</u>     | decl                   | 1 page    | 252 kb |
| <u>18</u>     | declm                  | 1 page    | 210 kb |
| <u>19</u>     | email2                 | 1 page    | 133 kb |
| <u>20</u>     | email3                 | 1 page    | 132 kb |
| <u>21</u>     | email4                 | 1 page    | 132 kb |
| <u>22</u>     | email5                 | 1 page    | 132 kb |
| <del>22</del> | email6                 | 1 page    | 132 kb |
| <del>24</del> | email7                 | 1 page    | 132 kb |

*Pet should be filed before the App Appen should be filed*

*App 1  
App 2  
App 3  
App 4  
and so on*

*These should be filed later*

*The documents are not in chronological order by email*

*Handwritten scribbles and marks around items 21-24.*

|               |                  |          |        |
|---------------|------------------|----------|--------|
| <del>25</del> | email8           | 1 page   | 132 kb |
| <del>26</del> | email9           | 1 page   | 132 kb |
| <del>27</del> | email10          | 2 pages  | 141 kb |
| <del>28</del> | email11          | 1 page   | 133 kb |
| <del>29</del> | email12          | 2 pages  | 145 kb |
| <del>30</del> | email13          | 1 page   | 140 kb |
| <del>31</del> | email14          | 1 page   | 133 kb |
| <del>32</del> | aug13            | 4 pages  | 118 kb |
| <del>33</del> | aug16            | 4 pages  | 89 kb  |
| <del>34</del> | thecourtappeared | 2 pages  | 33 kb  |
| <del>35</del> | deemed disbelief | 2 pages  | 40 kb  |
| <del>36</del> | exf              | 6 pages  | 227 kb |
| <del>37</del> | ex a-d           | 10 pages | 4.4 mb |
| <del>38</del> | mlvforwords      | 4 pages  | 1.9 mb |
| <del>39</del> | regswearing      | 6 pages  | 3.2 mb |
| <del>40</del> | declare          | 12 pages | 133 kb |
| <del>41</del> | pet1             | 22 pages | 116 kb |
| <del>42</del> | pet2             | 30 pages | 185 kb |
| <del>43</del> | word limit       | 3 pages  | 97 kb  |

# Exhibit F

Document Selection Menu

*DI 12*

Multiple Documents

To view the main document and its attachments without incurring a PACER fee, click on the hyperlinks displayed on this menu. You may incur a PACER fee to view CM/ECF documents from hyperlinks within the documents.

Select the document you wish to view.

|    |                        |           |        |
|----|------------------------|-----------|--------|
| 1  | Main Document          | 19 pages  | 206 kb |
| 2  | declmrearg             | 1 page    | 234 kb |
| 3  | Text of Proposed Order | 1 page    | 61 kb  |
| 4  | Email#1                | 1 page    | 148 kb |
| 5  | ex.16                  | 172 pages | 1.6 mb |
| 6  | ex.17                  | 213 pages | 1.8 mb |
| 7  | exa                    | 125 pages | 2.4 mb |
| 8  | exaa                   | 3 pages   | 65 kb  |
| 9  | exbb                   | 3 pages   | 82 kb  |
| 10 | exdd                   | 7 pages   | 248 kb |
| 11 | exff                   | 20 pages  | 1.5 mb |
| 12 | exgg                   | 61 pages  | 1.7 mb |
| 13 | exk                    | 102 pages | 2.1 mb |
| 14 | exk16                  | 173 pages | 4.3 mb |
| 15 | exk internal           | 98 pages  | 2.2 mb |
| 16 | exk table              | 113 pages | 2.8 mb |
| 17 | exn1                   | 95 pages  | 2.5 mb |
| 18 | exn3                   | 21 pages  | 426 kb |
| 19 | ex l-n                 | 52 pages  | 1.0 mb |
| 20 | ex n2                  | 86 pages  | 1.7 mb |
| 21 | great narr.            | 166 pages | 1.4 mb |
| 22 | email2                 | 1 page    | 158 kb |
| 23 | email3                 | 1 page    | 154 kb |
| 24 | email4                 | 2 pages   | 164 kb |
| 25 | email5                 | 2 pages   | 142 kb |

*→ See DI 35  
 Ex CC  
 DI 38 similar  
 be filed in front  
 The documents  
 are copy of  
 order.*

|    |                        |           |        |
|----|------------------------|-----------|--------|
| 25 | email6                 | 2 pages   | 147 kb |
| 26 | email7                 | 2 pages   | 141 kb |
| 27 | email8                 | 2 pages   | 141 kb |
| 28 | email9                 | 1 page    | 133 kb |
| 29 | email10                | 1 page    | 131 kb |
| 30 | exa order              | 2 pages   | 26 kb  |
| 31 | exa                    | 125 pages | 2.4 mb |
| 32 | exb email              | 2 pages   | 44 kb  |
| 33 | exb thru j             | 186 pages | 3.9 mb |
| 34 | ex.c                   | 138 pages | 0.6 mb |
| 35 | ex.cc                  | 11 pages  | 371 kb |
| 36 | ex.d                   | 25 pages  | 1.0 mb |
| 37 | ex.e table             | 13 pages  | 193 kb |
| 38 | ex.f table             | 7 pages   | 189 kb |
| 39 | ex.g meg               | 43 pages  | 311 kb |
| 40 | exh                    | 2 pages   | 0.6 mb |
| 41 | exk18                  | 45 pages  | 1.4 mb |
| 42 | exk33                  | 4 pages   | 108 kb |
| 43 | exk11-15               | 96 pages  | 3.8 mb |
| 44 | 31422 letter           | 11 pages  | 5.6 mb |
| 45 | email motion to extend | 1 page    | 122 kb |
| 46 | motion to extend       | 3 pages   | 117 kb |
| 47 | uc                     | 1 page    | 0.6 mb |

|    |                        |           |        |
|----|------------------------|-----------|--------|
| 25 | email6                 | 2 pages   | 147 kb |
| 26 | email7                 | 2 pages   | 141 kb |
| 27 | email8                 | 2 pages   | 141 kb |
| 28 | email9                 | 1 page    | 133 kb |
| 29 | email10                | 1 page    | 131 kb |
| 30 | exa order              | 2 pages   | 26 kb  |
| 31 | exa                    | 125 pages | 2.4 mb |
| 32 | exb email              | 2 pages   | 44 kb  |
| 33 | exb thru j             | 186 pages | 3.9 mb |
| 34 | ex.c                   | 138 pages | 0.6 mb |
| 35 | ex.cc                  | 11 pages  | 371 kb |
| 36 | ex.d                   | 25 pages  | 1.0 mb |
| 37 | ex.e table             | 13 pages  | 193 kb |
| 38 | ex.f table             | 7 pages   | 189 kb |
| 39 | ex.g meg               | 43 pages  | 311 kb |
| 40 | exh                    | 2 pages   | 0.6 mb |
| 41 | exk18                  | 45 pages  | 1.4 mb |
| 42 | exk33                  | 4 pages   | 108 kb |
| 43 | exk11-15               | 96 pages  | 3.8 mb |
| 44 | 31422 letter           | 11 pages  | 5.6 mb |
| 45 | email motion to extend | 1 page    | 122 kb |
| 46 | motion to extend       | 3 pages   | 117 kb |
| 47 | uc                     | 1 page    | 0.6 mb |



Filed 11/7/2022 3:29:00 PM Supreme Court Western District  
2913 DD3

# Exhibit 5

# Exhibit BB

Re: Transcripts for 115327-B/Thank you/possibility to correct errors?

From: Meg Kelly (meghankellyesq@yahoo.com)

To: patricia.schwartz@delaware.gov; karlis.johnson@delaware.gov; meghankellyesq@yahoo.com;  
supreme\_court\_bprfilings@delaware.gov

Date: Monday, January 31, 2022, 03:39 PM EST

Good afternoon,

The typist made some serious typos. I am not going to be able to go through everything the next few days, and I am sure I will not catch all errors. You will recall she had problems hearing me.

On page 94. Last line. It should be "I got the answer" is not "I got cancer."

Page 54 line 10 it should be "polluting" not putting.

Page 32 line 8 it should be "mind" not "light" of Christ.

Page 74 , line 17 I felt "he" was taken advantage of. It was not me. I felt my friend was taken advantage of not me. It was Mr Dick Goll. The typist did not hear "he"

Page 74 line 23, "my" for my former law firm, not me. These are smaller errors.

Page 75 I am pretty sure 84 or 85 is incorrect. It was exhibits A-4 and A-5 which are exhibits 2 and 3 to my answer to the petition.

Page 75 line 18 starting at line line 17 "but I do love God and standing up for my faith" she typed "space" instead of faith. I know she could not hear me, and she kept interrupting, which I do not see? Remember she said slow down and made comments on my crying. She did say she had trouble hearing me. So offer her grace.

There are a bunch of errors, maybe too many. I am pointing these out as I go.

Thank you,  
Meg

On Monday, January 31, 2022, 12:36:12 PM EST, Meg Kelly <meghankellyesq@yahoo.com> wrote:

Good afternoon,

I think I found errors in the transcript. If you recall, I was interrupted quite often because the person taking testimony could not remember what I said or type fast enough to keep up. So, she forgot what I said and did not transcribe it. She interrupted me quite often, causing me to lose my train of thought too, which you should recall. So, I could not repeat what I previously stated at times. She appeared to have trouble hearing me and noted I was crying, which you should recall. It appears she did not hear me at times.

How do we go about fixing this, or is too late?

Thank you. I hope you and your loved ones are okay.

Thank you,  
Meg  
Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com

On Monday, January 31, 2022, 12:04:18 PM EST, Johnson, Karlis P (Courts) <karlis.johnson@delaware.gov> wrote:

**Please see the attached transcripts for the above-referenced hearing.**

**From:** Kristina Flynn

**Sent:** Monday, January 31, 2022 11:16 AM

**To:** Johnson, Karlis P (Courts) <karlis.johnson@delaware.gov>

**Subject:** Board of Pro Respons Meghan Kelly 01-21-22

Attached please find the FINAL transcript from the above deposition. Also attached are the full sized and mini PDF versions. If you would like access to your deposition files through our online repository, simply respond to this email and we will be happy to create an account for you.

Due to the large file size of the exhibits, they will be accessible via the repository and can also be downloaded by [clicking here](#).

**\*Please note that this link will only be active for 10 days.\***

If we can assist you in any additional ways, please let us know.

# Exhibit 6

# Exhibit CC

## First Letter/Correcting Court Reporter errors/Bd 11537 B/ No 541

From: Meg Kelly (meghankellyesq@yahoo.com)

To: karlis.johnson@delaware.gov; patricia.schwartz@delaware.gov; supreme\_court\_bprfilings@delaware.gov;  
supreme\_courtfilings@delaware.gov; lisa.dolph@delaware.gov; meghankellyesq@yahoo.com

Date: Tuesday, February 1, 2022, 10:03 PM EST

Good evening,

Attached, please find a letter regarding the Court reporter's incorrect transcriptions, and some corrections, attached thereto. I reserve the right to submit additional corrections.

The errors are rather alarming. For instance, the court reporter wrote "space" when I said "faith," and other material errors.

I am filing this with both the Board and the DE Supreme Court, and I stuck it in the mailbox this evening to send to Patricia Swartz.

Thank you. Have a good night.

Regards,  
Meg  
Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
302-493-6693



Cert of Serv correcting Court Reporter's errors.pdf  
732.2kB



Letter regarding correcting Court Reporter's errors for the Jan 21 hearing.pdf  
701kB



List of Court Reporter's typos and my corrections.pdf  
116.2kB

**MEGHAN MARIE KELLY, ESQUIRE**

34012 Shawnee Drive  
Dagsboro, DE 19939

**Clerk of the Supreme Court  
55 The Green  
Dover, DE 19901**

**The Board on Professional Responsibility, The Renaissance Center,  
405 N. King Street, Suite 505  
Wilmington, DE 19801**

**RE: ODC Board Case No. 115327-B/ No 541/ Errors in Transcript/To be filed  
with both the Board and Delaware Supreme Court electronically**

February 1, 2022

Dear Sire and Madams:

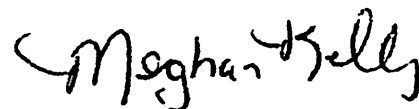
Per my E-mail, attached is a list of errors the Court reporter made. As I indicated, she repeatedly interrupted me, and indicated she had a hard time hearing me, noting I was crying or talking too quickly at times.

I am rather concerned about the severity of errors, and reserve the right to make additional corrections.

Thank you.

2/1/22

Very truly,



/s/Meghan Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com



Bar Number 4968  
(Word Count 62)

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

Dated: February 1, 2022

Meghan Kelly (printed)

Meghan Kelly (signed)

## First Letter/Correcting Court Reporter errors/Bd 11537 B/ No 541

From: Meg Kelly (meghankellyesq@yahoo.com)

To: karlis.johnson@delaware.gov; patricia.schwartz@delaware.gov; supreme\_court\_bprfilings@delaware.gov; supreme\_courtfilings@delaware.gov; lisa.dolph@delaware.gov; meghankellyesq@yahoo.com

Date: Tuesday, February 1, 2022, 10:03 PM EST

Good evening,

Attached, please find a letter regarding the Court reporter's incorrect transcriptions, and some corrections, attached thereto. I reserve the right to submit additional corrections.

The errors are rather alarming. For instance, the court reporter wrote "space" when I said "faith," and other material errors.

I am filing this with both the Board and the DE Supreme Court, and I stuck it in the mailbox this evening to send to Patricia Swartz.

Thank you. Have a good night.

Regards,  
Meg  
Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
302-493-6693



Cert of Serv correcting Court Reporter's errors.pdf  
732.2kB



Letter regarding correcting Court Reporter's errors for the Jan 21 hearing.pdf  
701kB



List of Court Reporter's typos and my corrections.pdf  
116.2kB

# Exhibit 8



# american family care URGENT CARE

## LAB REPORT

Shaakira West  
[REDACTED]  
[REDACTED]  
[REDACTED]

Test Date: 10/12/2022

Test Time:  
[REDACTED]

Patient ID: [REDACTED]

Date: 10/12/2022

Ordering Provider: Kevin Kramer, DO

NPI: [REDACTED]

Phone: [REDACTED]

### LAB TEST/RESULT:

SARS-COV-2 COVID19 W/OPTIC [87811]

SARS-COV-2 COVID19 W/OPTIC [87811]: Positive Abnormal (Normal = Negative)!!

*Kevin Kramer DO*

The COVID-19 Antigen Test is a lateral flow immunoassay intended for the qualitative detection of nucleocapsid protein antigen from SARS-CoV-2 from individuals with or without symptoms or other epidemiological reasons to suspect COVID-19 infection when tested twice over three days with at least 36 hours between tests. This test is authorized for non-prescription home use with self-collected direct anterior nasal (nares) swab samples from individuals aged 15 years or older or adult collected anterior nasal swab samples from individuals aged two years or older.

The COVID-19 Ag tests have not been FDA cleared or approved. They have been authorized by the FDA under an emergency use authorization. The tests have been authorized only for the detection of proteins from SARS-CoV-2, not for any other viruses or pathogens, and are only authorized for the duration of the declaration that circumstances exist justifying the authorization of emergency use of in vitro diagnostics for detection and/or diagnosis of COVID-19 under Section 564(b)(1) of the Federal Food, Drug and Cosmetic Act, 21 U.S.C. § 360bbb-3(b)(1), unless the declaration is terminated or authorization is revoked sooner.

# Exhibit 9

2913 dd 3 Fw: 22-45 to Gail only IMO M Kelly Respondent Meghan Kelly's Motion for good cause, to waive record, transcript fees, filing fees and other court costs by the Clerk and this Court, the declaration under protest thereto and an Order.

From: Meg Kelly (meghankellyesq@yahoo.com)  
To: anthony.sodroski@pacourts.us; meghankellyesq@yahoo.com  
Date: Saturday, November 5, 2022 at 08:46 AM EDT

Anthony,

I am super backed up. I am not sitting on things. See below. I am asserting my rights and am not waiving them.

Thank you for considering having understanding in light of irreparable injury to me.

Have a nice weekend.

Very truly,  
Meg

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

**From:** Meg Kelly <meghankellyesq@yahoo.com>  
**To:** Gail Olson <gail\_olson@paed.uscourts.gov>; Meg Kelly <meghankellyesq@yahoo.com>; chambers\_of\_judge\_paul\_s\_diamond@paed.uscourts.gov <chambers\_of\_judge\_paul\_s\_diamond@paed.uscourts.gov>  
**Sent:** Saturday, November 5, 2022 at 08:28:17 AM EDT  
**Subject:** 22-45 to Gail only IMO M Kelly Respondent Meghan Kelly's Motion for good cause, to waive record, transcript fees, filing fees and other court costs by the Clerk and this Court, the declaration under protest thereto and an Order.

Good morning Gail,

I sent you a series of forwarded emails on Respondent Meghan Kelly's Motion for good cause, to waive record, transcript fees, filing fees and other court costs by the Clerk and this Court, I attach hereto the emails in chronological order as a PDF.

The Exhibits were misfiled, missing documents, filed in an incorrect prejudicial manner which denies me the right to be heard by making the exhibits too cumbersome to identify before this Court and the United States Supreme Court should an appeal be required.

In the Delaware District Court, I found it was easier to correct misfiled documents by contacting the staff than filing motions. Albeit, it took more than one call to resolve misfilings. For instance, I filed multiple motions to correct Delaware District Court misfilings where a motion was split between two docket item numbers DI 95 and 96. However, a staff member fixed the error after simply talking with me on the phone. I received proof of the correction by US mail on November 4, 2022, attached hereto.

Similarly, a staff allegedly corrected a misfiling on the Court's part on DI 2 of the District Court matter on October 27, 2022. Although, I did not receive notice of the correction. It is unclear whether the public could see the correction on that date. There is evidence they could not, but that has since been corrected by contacting the staff by telephone. None of my motions appeared to matter. I filed a motion to correct that too. It was only talking to people that mattered in resolving issues.

That makes you more invaluable, than unheard motions. I am attempting to correct this without filing a motion to prevent waste of resources and confusion, and in light of the fact it did not appear to resolve issues in another court.

Should this not be resolved, I will likely be required to file a motion to safeguard my right to be heard to defend my life, liberty and eternal life.

I just am running out of time, and must focus on other cases which require more immediate and time consuming focus. The procedural history in the Delaware proceeding was more than 30 pages. The Court must have an accurate record to see what Motions were ignored, unaddressed and which motion evaded review denying me an opportunity to be heard on appeal, by rendering a non-appealable, informal email comment order.

The Court cannot see where I was denied a fair and impartial opportunity to be heard if it does not see the motions I requested to be heard on. I at no time waived or sat on my rights in the Delaware proceeding. I am fighting for my eternal soul from being thrown into the fires of hell, which I will not compromise or sell by barter or exchange for a mere license or money.

My religious beliefs are genuine, though the state finds them repugnant. I am permitted to believe differently than the state and the government backed private and foreign partners. If I am not free, than others are likely only free if their beliefs conditional conform to the fancies of the state and the state's private and foreign partners which make none free.

Thank you for your help. You are not replaceable by automation. People make mistakes. I make mistakes too. I am not God, but I believe you are smarter and more powerful than technology because you have the ability to reflect the image of God by laying down your interests, to take time to care for another, in order to do what is right by serving others as you would yourself, by love.

Thank you for your kind consideration as I face irreparable, immediate injury should I divest time from fighting the good fight in other courts with words.

Have a good weekend. On an aside, I think I downloaded the writable PDF fro one document in addition to sending an exhibit. We should not correct the filing by uploading it twice. I just do not know what is easier for the Court, having a writable document, or one with an exhibit page. The document I allude to relates to the planned economic crash which is reversible and preventable by the courts, no matter the misrepresentations people market.

Sorry for the inconvenience on that one item I overlooked.

Very truly,  
Meg  
Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
(302) 493-6693  
Retired Inactive 202268

- Email list of Oct 16th Motion on costs sent Nov 5th.pdf  
6.6MB
- docket correction 21-1490.pdf  
48.7kB

# Exhibit 10



2913 dd 3 (Anthony reciprocal matters bogarting time)Fw: (Zi-Xiang's thoughts)  
21-1490/21-3198/ 22-45 meg taking a step back

From: Meg Kelly (meghankellyesq@yahoo.com)  
To: anthony.sodroski@pacourts.us; meghankellyesq@yahoo.com  
Date: Monday, November 7, 2022 at 11:05 AM EST

Hi Anthony,

I need take a step back from the reciprocal cases to work on my main cases. I honestly am undecided on what to do next. I called the Court to confirm receipt of my letter requesting clarification on what the hearing is on, the two outstanding motions? They indicated they have only what I have, and cannot clarify at this time.

I am having such a difficult time correcting misfiled documents. It is bogarting all my time.

Is it really worth it losing time to appeal on. I have not even contested it yet.

It might be, in order to maintain appeals to the US Supreme Court should anything affect my appeal in the 3rd circuit.

I do not know.

Thank you,  
Meg

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

**From:** Meg Kelly <meghankellyesq@yahoo.com>  
**To:** Shen Zi-Xiang (DOJ) <zi-xiang.shen@delaware.gov>; Meg Kelly <meghankellyesq@yahoo.com>  
**Sent:** Monday, November 7, 2022 at 10:28:02 AM EST  
**Subject:** (Zi-Xiang's thoughts) 21-1490/21-3198/ 22-45 meg taking a step back

Hi Zi-Xiang

I am taking a step back from the eastern district Court case, because I am hitting a brick wall. I spent all weekend outlining the filings that were misfiled, and called the staff in charge of filing to be available to help her file them.

She requires I file Motions. This time interferes with my appeals. I need to take a step back.

I do not want to be compelled to call your clients needlessly when testimony may more justly be gathered in an open forum once than multiple times in reciprocal suits.

I am exhausted pulling early mornings late nights.

I am open to your thoughts.

Thank you,  
Meg

# Exhibit 11

(Different separate motion November 5, 2022) Fw: 22-45 IMO M. Kelly/ Motion for an Order on her Motion for a rehearing on the Court Order Denying Request for ECF access, and my corrected Motion to Stay the Proceeding until the conclusion of both Respondent's originating disciplinary proceeding, and civil rights proceeding until final non-appealable determinations are made or the time of appeal has lapsed, dated November 3, 2022

From: Meg Kelly (meghankellyesq@yahoo.com)

To: paed\_documents@paed.uscourts.gov; gail\_olson@paed.uscourts.gov;  
chambers\_of\_judge\_paul\_s\_diamond@paed.uscourts.gov; meghankellyesq@yahoo.com

Date: Saturday, November 5, 2022 at 07:25 AM EDT

Good morning,

The filings attached hereto were incorrectly filed as an attachment.

It is easier for me and possibly for this Court to ask the Clerk's office to refile the attached documents below, as opposed to fixing them. I seek to preserve the record for potential appeals. I face irreparable immediate injury due to loss of time necessary to defend my life, liberty, property interests in my licenses to practice law, and eternal life in other courts.

It is fine if it is filed as of November 5, 2022, so long as I maintain the record for appeals purposes that the documents below were filed as an attachment under an incorrect docket item number.

Thank you.

Very truly,  
Meg  
Meghan Kelly  
34012 Shawnee  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
(302) 493-6696

Retired inactive No 202268

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

From: Meg Kelly <meghankellyesq@yahoo.com>

To: paed\_documents@paed.uscourts.gov <paed\_documents@paed.uscourts.gov>; Meg Kelly <meghankellyesq@yahoo.com>

Sent: Thursday, November 3, 2022 at 08:28:16 PM EDT

Subject: 22-45 IMO M. Kelly/ Motion for an Order on her Motion for a rehearing on the Court Order Denying Request for ECF access, and my corrected Motion to Stay the Proceeding until the conclusion of both Respondent's originating disciplinary proceeding, and civil rights proceeding until final non-appealable determinations are made or the time of appeal has lapsed, dated November 3, 2022

Good evening,

Attached please find:

1. Respondent Meghan Kelly's Motion for an Order on her Motion pursuant to Local Rule 7.1 (g), FRCP 52, and in addition to or in the alternative of FRCP 59(e), for a rehearing on the Court Order Denying Request for ECF access, and my corrected Motion to Stay the Proceeding until the conclusion of both Respondent's originating disciplinary proceeding, and civil rights proceeding until final non-appealable determinations are made or the time

of appeal has lapsed, date November 3, 2022

2. Respondent Meghan Kelly's certification that her Motion is unopposed and does not require a brief
3. Proposed Order

Thank you. Please feel free to contact me should you have any questions or concerns.

Have a good day.

Very truly,  
Meg  
Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
(302)493-6693  
202268 Retired inactive

- ✎ Motion for an order.pdf  
1.1MB
- ✎ Certification Motion is unopposed.pdf  
795.4kB
- ✎ Proposed Order on Motion for Rehearing.pdf  
78.5kB

Filed 11/7/2022 3:29:00 PM Supreme Court Western District  
2913 DD3

# Exhibit 12

**Fw: 22-45 IMO M Kelly /Respondent Meghan Kelly's Motion for an Order on her Motion for good cause, to waive record, transcript fees, filing fees and other court costs by the Clerk and this Court in order not to compel her to violate her religious beliefs against debt in exchange for access to the courts in defense of her First amendment rights**

**From:** Meg Kelly (meghankellyesq@yahoo.com)  
**To:** paed\_documents@paed.uscourts.gov; gail\_olson@paed.uscourts.gov;  
chambers\_of\_judge\_paul\_s\_diamond@paed.uscourts.gov  
**Date:** Saturday, November 5, 2022 at 07:21 AM EDT

Good morning,

The filings attached hereto were incorrectly filed as an attachment.

It is easier for me and possibly for this Court to ask the Clerk's office to refile the attached documents below, as opposed to fixing them. I seek to preserve the record for potential appeals. I face irreparable immediate injury due to loss of time necessary to defend my life, liberty, property interests in my licenses to practice law, and eternal life, in other forums.

It is fine if it is filed as of November 5, 2022, so long as I maintain the record for appeals purposes that the documents below were filed as an attachment under an incorrect docket item number.

Thank you.

Very truly,  
Meg  
Meghan Kelly  
34012 Shawnee  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
(302) 493-6696

Retired inactive No 202268

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

**From:** Meg Kelly <meghankellyesq@yahoo.com>  
**To:** paed\_documents@paed.uscourts.gov <paed\_documents@paed.uscourts.gov>; Meg Kelly <meghankellyesq@yahoo.com>  
**Sent:** Thursday, November 3, 2022 at 07:28:21 PM EDT  
**Subject:** 22-45 IMO M Kelly (one email motion) Respondent Meghan Kelly's Motion for an Order on her Motion for good cause, to waive record, transcript fees, filing fees and other court costs by the Clerk and this Court in order not to compel her to violate her religious beliefs against debt in exchange for access to the courts in defense of her First amendment rights

Good evening,

Attached, please find:

1. Respondent Meghan Kelly's Motion for an Order on her Motion for good cause, to waive record, transcript fees, filing fees and other court costs by the Clerk and this Court in order not to compel her to violate her religious beliefs against debt in exchange for access to the courts in defense of her First amendment rights
2. Exhibit thereto, a December 8th In forma pauperis papers filed in the Third Circuit Court of Appeals I incorporated therein by reference

3. Respondent Meghan Kelly's certification that her Motion is unopposed and does not require a brief
4. And a proposed Order.

Please feel free to contact me should you have any questions or concerns.

Thank you.

Very truly,  
Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
(302) 493-6693  
Inactive retired 202268

- Meg's Motion for an order on Oct 16th Motion.pdf  
1.5MB
- Exhibit Dec 8 in forma pauperis.pdf  
12.1MB
- Certification Motion does not require a brief.pdf  
695.3kB
- Proposed Order on Motion for costs.pdf  
78.9kB

# Exhibit 13



**ATTORNEY REGISTRATION OFFICE**

Pennsylvania Judicial Center

501 Commonwealth Avenue, Suite 5600

P.O. Box 62625

Harrisburg, PA 17106-2625

Phone: (717) 231-3380



ATTACH CURRENT VALIDATED LICENSE CARD  
AND RETURN COMPLETED FORM TO THE  
ATTORNEY REGISTRATION OFFICE.

VI 7-1-17

IF YOU DO NOT HAVE YOUR CURRENT CARD,  
PLEASE PROVIDE A BRIEF EXPLANATION.

**APPLICATION FOR RETIREMENT (Form DB-27)**

Notice is hereby given that I apply for retired status, pursuant to Pa.R.D.E. 219(i). In taking this action, I fully understand that after the Supreme Court issues an order transferring me to retired status, I shall no longer be eligible to practice law in Pennsylvania and will be relieved from the payment of the fee imposed by this rule upon active practitioners. I further understand that if I remain on retired status for three years or less, that I may be reinstated by paying the annual active fee for the three most recent years or such shorter period in which I was on retired status.

By signing this form, I acknowledge that I am aware that: 1) under Pa.R.D.E. 201(a)(3), the Supreme Court of Pennsylvania and the Disciplinary Board retain jurisdiction to discipline me for misconduct; 2) if I am convicted of a crime, I have a continuing duty under Pa.R.D.E. 214(a) to report the conviction to the Office of Disciplinary Counsel within 20 days; and 3) if I am disciplined by another court or in another jurisdiction, I have a continuing duty under Pa.R.D.E. 216(e) to report such to the Secretary of the Disciplinary Board within 20 days. I also certify that, to my knowledge, there are no ongoing investigations into any misconduct on my part in this or any other jurisdiction.

Attorney Name: Meghan Marie Kelly

Attorney ID Number: 202268

Office Address: \_\_\_\_\_

Residence Address: 34012 Shawnee Drive

Dagsboro, DE 19939

Telephone Number: 302-537-1089 E-Mail: meghan.kelly.esq@yahoo.com

Signature: Meghan M. Kelly Date: May 12, 2018

**REQUEST FOR SUPREME COURT ACTION**

PROTHONOTARY

WESTERN DISTRICT OFFICE

In accordance with Rule 219(i) of the Pennsylvania Rules of Disciplinary Enforcement, it is requested that an Order transferring the above attorney to retired status be issued.

DCB

5-16-18

Attorney Registration Office

Date

# Exhibit D

**IN THE SUPREME COURT OF PENNSYLVANIA**

In the Matter of : No. 2913 Disciplinary Docket No. 3  
MEGHAN MARIE KELLY : No. 118 DB 2022  
: (Supreme Court of Delaware,  
: No. 58, 2022)  
: Attorney Registration No. 202268  
: (Out of State)

**ORDER**

**PER CURIAM**

**AND NOW**, this 8<sup>th</sup> day of November, 2022, the Application to Waive Costs is dismissed as moot. The Motion to File Unconforming Pleadings is granted. See Pa.R.A.P. 124(b). The Motion to Stay the Proceeding is denied. Respondent is afforded an additional 30 days from the date of this Order to inform this Court of any grounds against the imposition of the identical or comparable discipline in this Commonwealth.

"Ancillary Motion Dismissed as Moot" electronic service for case "In re: Meghan Marie Kelly" (2913 DD3)

From: administrator@pacourts.us

To: meghankellyesq@yahoo.com

Date: Tuesday, November 8, 2022 at 11:30 AM EST

## **"Ancillary Motion Dismissed as Moot" electronic service for case "In re: Meghan Marie Kelly" (2913 DD3)**

Service has been delivered to you, or the attorney(s) you are proxying for. You must log into the PACFile system to view the document that you have just received through eService. Failure to access this document via PACFile does not constitute grounds for disputing service or the filing.

Click the following link to login to PACFile and view this notification: <https://ujportal.pacourts.us/Secure/eFiling/ViewNotification.aspx?notificationID=121520334>.

This notification was sent on 11/8/2022 11:02 AM.

# Exhibit E

EXHIBIT E

2913 dd3 (Position on motion for a rehearing on orders, denying stay and such)

From: Meg Kelly (meghankellyesq@yahoo.com)  
To: anthony.sodroski@pacourts.us  
Cc: meghankellyesq@yahoo.com  
Date: Wednesday, November 9, 2022 at 11:11 AM EST

Good morning,

What is your position if I file a motion for reargument on the Court's November 8th Orders?

Thank you.

Have a good day. My parents are in Florida. The storm Nicole is a little scary. They are preparing now.

I hope your loved ones are safe.

Very truly,  
Meg  
Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
(302) 493-6693  
retired license in PA 202268





# Exhibit F

Re: (Thank you Gail for indicating you require a motion) Re: DI 10 M Kelly 22-45 PDF of all emails in chronological order for DI 10 attached hereto

From: Meg Kelly (meghankellyesq@yahoo.com)  
To: gail\_olson@paed.uscourts.gov  
Cc: chambers\_of\_judge\_paul\_s\_diamond@paed.uscourts.gov; meghankellyesq@yahoo.com  
Date: Tuesday, November 8, 2022 at 09:31 AM EST

Hi Gail,

The motions to Correct DI 10 and DI 12 to clarify. All my emails I sent were meant to make it easier to correct, but you require I file motions to correct the misfiled documents which are out of order making it too tedious for the Court to go through as to render me without opportunity to be heard on them.

I thought I could walk you through it by the phone yesterday, but you preferred I file motions. You led me to believe you would not make corrections on the two misfiled docket items unless I filed additional requests through the email filing system.

If that is not correct and I misunderstood, I am available today to help you correct the misfiled documents or may make myself available at an alternative time more convenient for you. I was told Frank filed the misfiled documents on your behalf.

Thank you,  
Meg  
Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
(302) 493-6693  
Retired inactive  
202268

On Tuesday, November 8, 2022 at 09:20:45 AM EST, Gail Olson <gail\_olson@paed.uscourts.gov> wrote:

Meg, I have no idea what motions you are talking about, I require no motions. If you have filings, just sent them to the [paed\\_documents@paed.uscourts](mailto:paed_documents@paed.uscourts) to be filed.

Gail

---

**From:** Meg Kelly <meghankellyesq@yahoo.com>  
**Sent:** Tuesday, November 8, 2022 9:17 AM  
**To:** Gail Olson <Gail\_Olson@paed.uscourts.gov>  
**Cc:** Meg Kelly <meghankellyesq@yahoo.com>; Chambers of Judge Paul S Diamond <Chambers\_of\_Judge\_Paul\_S\_Diamond@paed.uscourts.gov>  
**Subject:** (Thank you Gail for indicating you require a motion) Re: DI 10 M Kelly 22-45 PDF of all emails in chronological order for DI 10 attached hereto

**CAUTION - EXTERNAL:**

Good morning Gail,

Thank you for the email below. Additionally, thank you for talking to me yesterday early morning. I tried to be available to you yesterday to help you see where the files were misfiled. I also asked whether you required motions.

By the email below, it appears you require motions. I may not have time to file a motion until after I draft my appeals. I am really backed up. I am by no means sitting on this matter. I face irreparable injury should I not address other courts. I believe I may overturn the original disciplinary order, rendering this matter potentially moot.

Thank you for understanding.

I am copying the Court on this, should anyone have any questions or concerns. There is no opposing counsel.

Thank you. Have a nice day.

Very truly,

Meg

Meghan Kelly

34012 Shawnee Dr.

Dagsboro, DE 19939

[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)

(302) 493-6693

202268 retired inactive

On Tuesday, November 8, 2022 at 08:41:43 AM EST, Gail Olson <[gail\\_olson@paed.uscourts.gov](mailto:gail_olson@paed.uscourts.gov)> wrote:

Meghan please do not send me emails of filings that were done before. If you have a problem with a filing, please email [paed\\_documents](mailto:paed_documents) and explain your problem.

**CAUTION - EXTERNAL EMAIL:** This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.

# Exhibit G

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN THE MATTER OF** : **MISCELLANEOUS**  
:   
**MEGHAN MARIE KELLY** : **No. 22-45**  
:

---

**NOTICE**

**AND NOW**, this 3rd day of November, 2022, please take note that a **HEARING** in the above-captioned matter is **SCHEDULED** for **January 9, 2023** at **11:00 a.m.** **THE HEARING WILL TAKE PLACE VIRTUALLY.** You may have counsel represent you at the hearing.

ATTEST:

or BY THE COURT:

*/s/ Richard C. Thieme*  
BY: \_\_\_\_\_  
Richard C. Thieme  
Deputy Clerk

\_\_\_\_\_  
Paul S. Diamond, J.

cc: Honorable Gerald J. Pappert  
Honorable John M. Gallagher  
Meghan Marie Kelly

# Exhibit H

Re: (file and serve)(reach out to Jason on claim No)Re: Meghan Kelly/Delaware Supreme Court/ Question dates sealing and unsealing matters/o 119-2021 and matter No 58-2022

From: Meg Kelly (meghankellyesq@yahoo.com)

To: jgonzales@fileandserve.com

Cc: meghankellyesq@yahoo.com; lisa.dolph@delaware.gov; kathleen.vavala@delaware.gov; david.white@delaware.gov

Bcc: david.weiss@usdoj.gov

Date: Monday, November 7, 2022 at 12:17 PM EST

Hi Jason,

Thank you for the email below. I have not heard back from you, and November 4, 2022 has passed.

This week there are 3 days the state courts may be closed or have reduced hours, tomorrow November 8th, Return's Day November 10th for half a day, and Friday veteran's day.

Please let me know if you require more time or clarification.

Thank you.

Meg

On Thursday, November 3, 2022 at 01:01:45 PM EDT, Gonzales <jgonzales@fileandserve.com> wrote:

Good afternoon Ms. Kelly.

I understand you have made phone calls to our Client Support team regarding sealing/unsealing docs in cases 119-2021 and 58-2022, respectively. I am diligently working to provide answers to your questions.

My goal is to have answers for you no later than EOD tomorrow, Friday, 11/4/2022.

I am your liaison for this matter. Please contact me should you have any questions.

Thank you for your patience while I work to provide answers to your questions.

Best regards,

Jason

**Jason Gonzales**

Manager, Account Management, File & ServeXpress

972-893-6632 jgonzales@fileandserve.com



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the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

**From:** Meg Kelly <meghankellyesq@yahoo.com>  
**Sent:** Tuesday, November 1, 2022 4:10 PM  
**To:** Jason Gonzales <jgonzales@fileandserve.com>  
**Cc:** Meg Kelly <meghankellyesq@yahoo.com>  
**Subject:** (file and serve)(reach out to Jason on claim No)Re: Meghan Kelly/Delaware Supreme Court/ Question dates sealing and unsealing matters/o 119-2021 and matter No 58-2022

Hi Jason,

I just spoke with Kelly and placed a ticket item for the issues below, 156496.

Thank you for your help. I also sent in another email today.

Have a good night.

Very truly,

Meg

Meghan Kelly

34012 Shawnee Dr.

Dagsboro, DE 19939

[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)

(302)493-6693

On Thursday, October 13, 2022 at 06:00:36 PM EDT, Jason Gonzales <jgonzales@fileandserve.com> wrote:

My pleasure, Ms. Kelly.

Let me do some research on our side to see what information we can glean.

Thank you.

Jason

**Jason Gonzales**

Manager, Account Management, File

& ServeXpress

972-893-6632

jgonzales@fileandserve.com



---

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---

**From:** Meg Kelly <meghankellyesq@yahoo.com>  
**Sent:** Wednesday, October 12, 2022 5:41 PM  
**To:** Jason Gonzales <jgonzales@fileandserve.com>  
**Cc:** Support <support@fileandserve.com>; Meg Kelly <meghankellyesq@yahoo.com>  
**Subject:** Re: Meghan Kelly/Delaware Supreme Court/ Question dates sealing and unsealing matters/o 119-2021 and matter No 58-2022

Hi Jason,

Thank you so much. The court misbehaved by sealing and leaving documents unsealed to protect the court.

Are you able to provide dates documents were unsealed and sealed in both matters?

I have contacted the court. The court provided inaccurate information on the unsealing and sealing of documents in the two matter.

Thank you for the email indicating it is not file serve's fault or under your control.

Thank you,

Meg  
Please forgive typos.

Sent from my iPhone

On Oct 12, 2022, at 4:52 PM, Jason Gonzales <jgonzales@fileandserve.com> wrote:

Good afternoon Ms. Kelly.

Our Support team forwarded your email to me. I can confirm that our platform is integrated with the Delaware Courts. Our system automatically updates when the court takes action on or changes the status of a case/filing/documents. File & ServeXpress does not assume the authority to seal and unseal documents.

I encourage you to contact the court should you have any questions about the security status of a case and/or a document(s).

Thank you.

Sincerely,

Jason

**Jason Gonzales**  
Manager, Account Management, File & ServeXpress

<image011.png>

972-893-6632

<image018.png>

<image012.png>

jgonzales@fileandserve.com

<image013.png> <image014.png> <image015.png> <image016.png> <image017.png>

---

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---

**From:** Support <support@fileandserve.com>  
**Sent:** Monday, October 10, 2022 1:19 PM

To: 'Meg Kelly' <meghankellyesq@yahoo.com>  
Cc: Support <support@fileandserve.com>  
Subject: RE: Meghan Kelly/Delaware Supreme Court/ Question dates sealing and unsealing matters/o 119-2021 and matter No 58-2022

Hello Ms. Kelly!

I have reached out to our team to provide some clarify for your inquires below, and will follow up with you before the end of the day with additional information.

<image001.gif>

Client Support JR, File & ServeXpress

<image002.png>

888-529-7587

<image003.png>

<image009.png>

support@fileandserve.com

<image004.png> <image005.png> <image006.png> <image007.png> <image008.png>

<image010.jpg>

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---

From: Meg Kelly <meghankellyesq@yahoo.com>  
Sent: Monday, October 10, 2022 12:01 PM  
To: Support <support@fileandserve.com>  
Cc: Meg Kelly <meghankellyesq@yahoo.com>  
Subject: Meghan Kelly/Delaware Supreme Court/ Question dates sealing and unsealing matters/o 119-2021 and matter No 58-2022

Good morning,

Per the September 7, 2022 order in the first docket attached hereto, relating to Delaware Supreme Court matter IMO Meghan Kelly a member of the bar, the court ordered the case unsealed. Did the Court process the request on September 29, 2022, and did it go through on September 30, 2022?

In the second docket attached hereto, case number 119, 2021, Case name Meghan Kelly v Donald Trump, could you please provide the dates the following four documents were sealed and unsealed?

Transaction ID 66649842, docket item 21.

Transaction ID 66639035, docket item 16

Transaction item number 66667019, Docket Item 40, appendix A-4, Docket item 41 Appendix A-5.

Could you please confirm that Delaware Courts are an integrated courts. By integrated Courts I mean the courts are in charge of what is sealed and unsealed. File and serve does not assume the authority to seal and unseal documents by request. It is physically entered by the attorneys and courts.

I am a party in both cases.

Thank you,

Meg

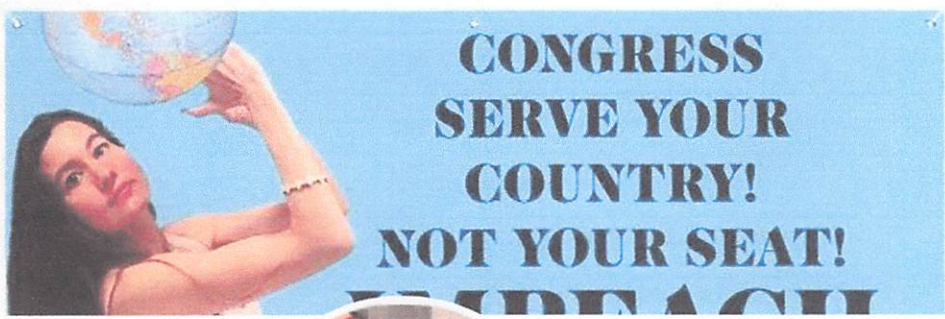
Meghan Kelly

34012 Shawnee Dr.

Dagsboro, DE 19939

[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)

# Exhibit I



# Meg Kelly

900 friends



Add to story

Edit profile



Meg Kelly



## Intro

Edit bio



Followed by 202 people

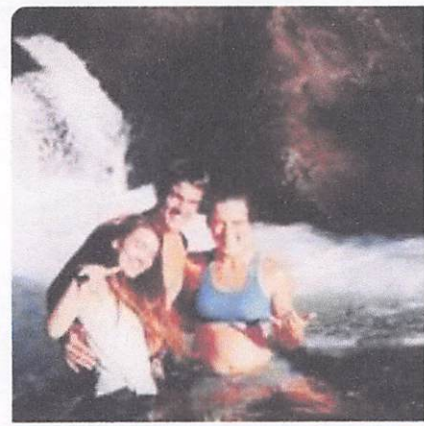
Edit details

Add hobbies



### Photos

[See all photos](#)



### Friends

900 friends

[See all friends](#)







Kevin Daughaday



Ginger Turssline



Lori Cashman Funari



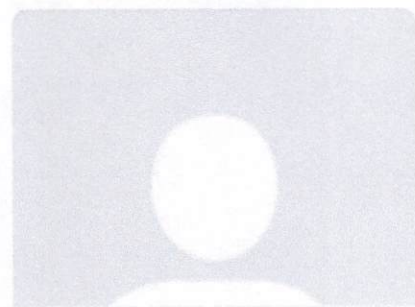
Josie Gay



Bethany Frick



Lisa Mathena



Privacy · Terms · Advertising · Ad Choices · Cookies · More · Meta © 2022



What's on your mind?

Live video

Photo/video

Life event

Posts

Filters

Manage posts





Just so you don't forget



Meg Kelly 1h · 🌐

WE are taught to not use our brains, which allows those who purport to know best to mislead us to harm and hell. Ignorance is not innocence. Please do not blindly seek answers from other people, experts and professionals or leaders or even me. Use your own brain and analyze information. It is naughty to tell you not to do your own research. You must use your own brain or you may be misled by others to harm or damnation in the fires of hell guys. Not my brain, but your own ... [See more](#)

Lori Cashman Funari

Like Comment Share



**Meg Kelly** shared a memory.  
2h · 🌐

So this was the day.



3 Years Ago  
See your memories



**Meg Kelly**  
November 8, 2019 · 🌐

I am having the worst day!!!

On the ride to Georgetown this morning, a cute old lady with white hair grimaced at me and gave me the middle finger.

Two people yesterday talked about me getting shot for my impeachment stickers. Do me a favor. STOP talking about shooting me please because someone may actually shoot me. I do not want to die. I want to live and speak life.... [See more](#)

Like

Comment

Write a comment...



**Meg Kelly** shared a memory.  
2h · 🌐



3 Years Ago  
See your memories



**Meg Kelly**  
November 8, 2019 · 🌐

During law school, the press were the only heroes that attempted to save me. Did I get saved, no. But they are still heroes.

We must safeguard the freedom of the press. They give a voice to the voiceless, a defense to the defenseless. They are heroes shedding light on the darkness, the darkness is giving into the temptation to ignore evil by covering it up with more darkness (ignorance) instead of driving it out with light, truth....





Write a comment

Meg Kelly shared a memory. 2h ·

Vote Steve Smyk. He was my hero reflecting true leadership 4 years from today. Love you guys. He is not a mere republican. He helps all people regardless of diverse party affiliation or beliefs. Steve Smyk is special. So are you guys. Love you



4 Years Ago  
See your memories



Meg Kelly is with Stephen Smyk. November 8, 2018 ·

I am grateful for the kindness Steve Smyk bestowed on me today by allowing me the honor to ride with him. He represents burying the hatchet. He represents the hope we have with our new leaders including Colleen Daves and Kathy Mcguiness. He's respectful and kind to all and honest. Years ago he reached out to me when he respectfully disagreed on my position relating to the death penalty. I appreciated it. I was really impressed. Did either of us change our mind, no. But he is ... See more



+2



Like Comment

Write a comment...

Meg Kelly shared a memory. 2h ·

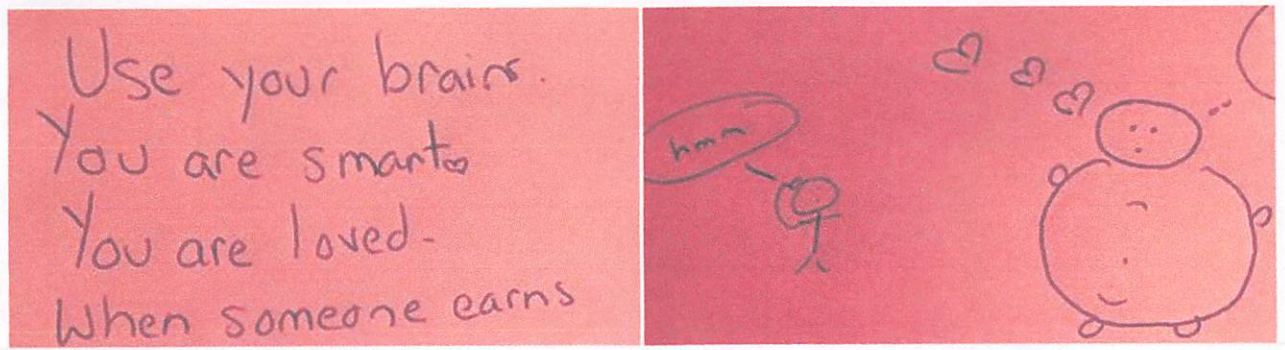


3 Years Ago See your memories



Meg Kelly November 8, 2019 ·

I am crying because people keep pimping out beloved Jesus to fill their pockets, not hearts with love When I get really sad, I draft fat bellied cartoons. You are precious guys. You are not for sale. You are free. You are priceless not a price tag. I love you. You are loved as is. Accept it. Reflect it.

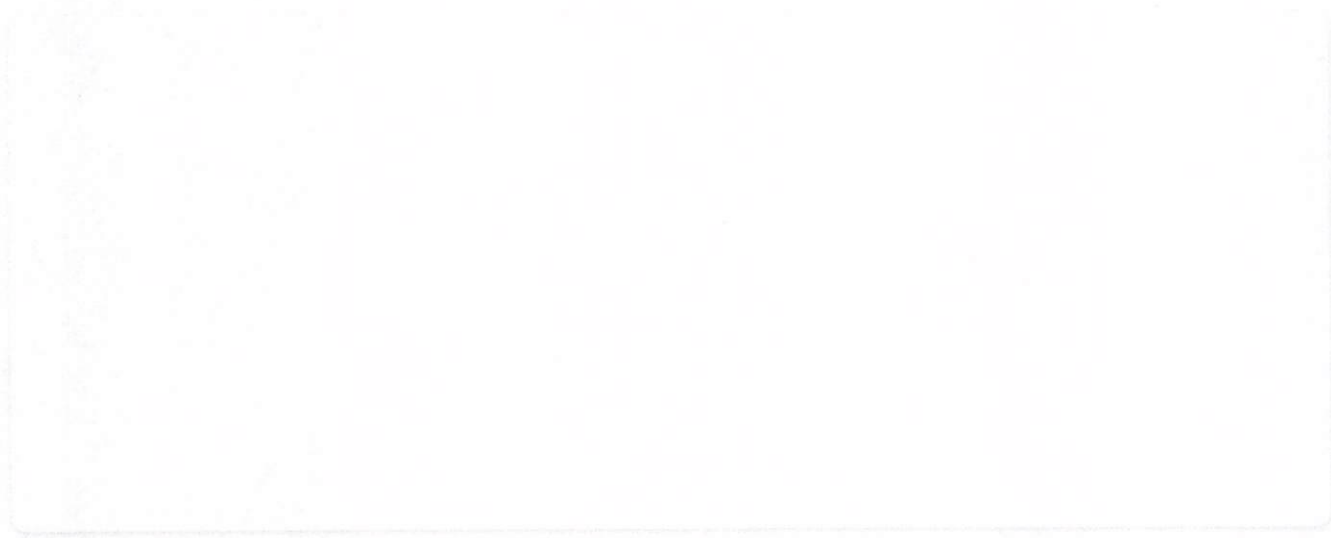
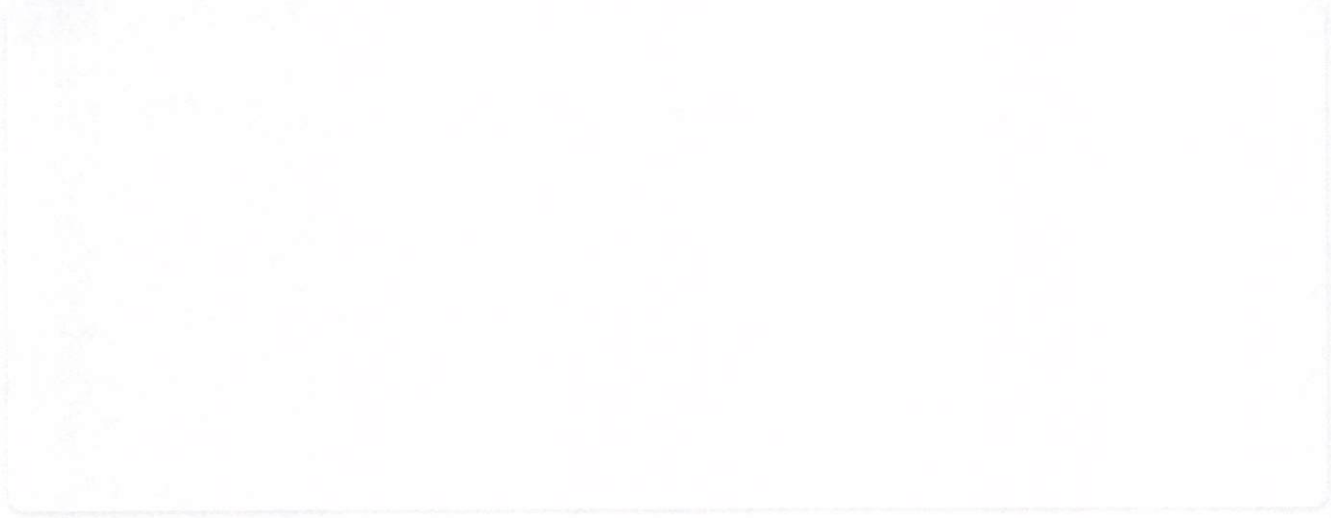


 **Meg Kelly**  
2h · 

Vote Colleen Davies. I grew up with our state treasurer, albeit I am older. We both played soccer on the boys soccer team in high school. I went to church with her family and dated her handsome brother, Charles Carroll, when I was a child. He is probably so embarrassed now. Colleen is an olive branch that extends to all, regardless of party. Guys her dad used to be the head of the Republican party in Sussex. She is heavily supported by Democrats and is a democrat that truly ... [See more](#)







# Exhibit J













UNITED STATES DISTRICT COURT IN THE DISTRICT OF  
DELAWARE

|                                  |   |                                   |
|----------------------------------|---|-----------------------------------|
| Meghan Kelly                     | ) | Civil Action No.: 1:21-1490 (CFC) |
|                                  | ) |                                   |
| Plaintiff,                       | ) |                                   |
| v.                               | ) |                                   |
| Disciplinary Counsel Patricia B. | ) |                                   |
| Swartz, et.al                    | ) |                                   |
| Defendants.                      | ) |                                   |

CERTIFICATE OF SERVICE OF  
PLAINTIFF MEGHAN KELLY'S FIRST AFFIDAVIT UPDATE  
U.S. DISTRICT COURT, DISTRICT OF DELAWARE

I, Meghan M. Kelly, Esquire, hereby certify on Nov. 9, 2022, I had a true and correct copy of the above referenced letter, served via Email to Defendants, through their counsel:

Zi-Xiang Shen  
Delaware Department of Justice  
820 North French Street  
6<sup>th</sup> Floor  
Wilmington, DE 19801

Dated

Nov. 9, 2022

Respectfully submitted,



Meghan M. Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)  
(302) 493-6693

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

Dated: Nov. 9, 2022

Meghan Kelly (printed)

Meghan Kelly (signed)

under the penalty of perjury, I declare, affirm that the foregoing statement is true and correct  
in the Bible, I declare, affirm that the foregoing statement is true and correct  
I have religiously protest as declaring and swearing under the penalty of perjury

Date:

(Printed)

(Signed)



2025 NOV 10 11 09:23

86



U.S. POSTAGE 24



FROM:

**PRIORITY MAIL**



VISIT US AT USPS.COM ORDER FREE SUPPLIES ONLINE

FROM: *Meg Kelly*  
*34012 Shawnee Dr.*  
*Dagsburg, DE 19939*

TO: *Clerk of Court*  
*United States District*  
*Court, District of DE*  
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*Wilm., DE 19801*

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