

A I F D

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

Meghan M. Kelly — PETITIONER
(Your Name)

VS.

Disciplinary Counsel Patricia B. Swartz, et al. — RESPONDENT(S)

MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

The petitioner asks leave to file the attached petition for a writ of certiorari without prepayment of costs and to proceed *in forma pauperis*.

Please check the appropriate boxes:

☐ Petitioner has previously been granted leave to proceed *in forma pauperis* in the following court(s): Third Circuit Court of Appeals No. 21-3148, 22-3372
DE District Court No. 21-1490, DE Chancery Court No. 20-0809, 2020-067, DE Supreme Court No. 119-2021,

☐ Petitioner has **not** previously been granted leave to proceed *in forma pauperis* in any other court.

☒ Petitioner's affidavit or declaration in support of this motion is attached hereto.

☐ Petitioner's affidavit or declaration is **not** attached because the court below appointed counsel in the current proceeding, and:

☐ The appointment was made under the following provision of law: _____, or

☐ a copy of the order of appointment is appended.

Meghan M. Kelly
(Signature)

**AFFIDAVIT OR DECLARATION
IN SUPPORT OF MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS***

I, Meghan Kelly, am the petitioner in the above-entitled case. In support of my motion to proceed *in forma pauperis*, I state that because of my poverty I am unable to pay the costs of this case or to give security therefor; and I believe I am entitled to redress.

1. For both you and your spouse estimate the average amount of money received from each of the following sources during the past 12 months. Adjust any amount that was received weekly, biweekly, quarterly, semiannually, or annually to show the monthly rate. Use gross amounts, that is, amounts before any deductions for taxes or otherwise.

Income source	Average monthly amount during the past 12 months		Amount expected next month	
	You	Spouse	You	Spouse
Employment	\$ 0	\$ 0	\$ 0	\$ 0
Self-employment	\$ 0	\$ 0	\$ 0	\$ 0
Income from real property (such as rental income)	\$ 0	\$ 0	\$ 0	\$ 0
Interest and dividends	\$ 0	\$ 0	\$ 0	\$ 0
Gifts	\$ 300	\$ 0	\$ 0	\$ 0
Alimony	\$ 0	\$ 0	\$ 0	\$ 0
Child Support	\$ 0	\$ 0	\$ 0	\$ 0
Retirement (such as social security, pensions, annuities, insurance)	\$ 0	\$ 0	\$ 0	\$ 0
Disability (such as social security, insurance payments)	\$ 0	\$ 0	\$ 0	\$ 0
Unemployment payments	\$ 0	\$ 0	\$ 0	\$ 0
Public-assistance (such as welfare)	\$ 0	\$ 0	\$ 0	\$ 0
Other (specify): _____	\$ 0	\$ 0	\$ 0	\$ 0
Total monthly income:	\$ 300	\$ 0	\$ 0	\$ 0

2. List your employment history for the past two years, most recent first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of Employment	Gross monthly pay
N/A	N/A	N/A	\$ 0
			\$
			\$

3. List your spouse's employment history for the past two years, most recent employer first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of Employment	Gross monthly pay
N/A	N/A	N/A	\$ 0
			\$
			\$

4. How much cash do you and your spouse have? \$ 0
Below, state any money you or your spouse have in bank accounts or in any other financial institution.

Type of account (e.g., checking or savings)	Amount you have	Amount your spouse has
N/A	\$ 0	\$ 0
	\$	\$
	\$	\$

5. List the assets, and their values, which you own or your spouse owns. Do not list clothing and ordinary household furnishings.

☐ Home Value N/A

☐ Other real estate Value N/A

☐ Motor Vehicle #1
Year, make & model 2014 Toyota Corolla
Value \$5,000 unknown amount
Door on driver's side broke

☐ Motor Vehicle #2
Year, make & model
Value

☐ Other assets Description N/A
Value

	You	Your spouse
Transportation (not including motor vehicle payments)	\$ 100	\$ N/A
Recreation, entertainment, newspapers, magazines, etc.	\$ 20	\$ N/A
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ N/A	\$ N/A
Life	\$ N/A	\$ N/A
Health	\$ N/A	\$ N/A
Motor Vehicle	\$ 70	\$ N/A
Other: _____	\$ N/A	\$ N/A
Taxes (not deducted from wages or included in mortgage payments)		
(specify): _____	\$ N/A	\$ N/A
Installment payments		
Motor Vehicle	\$ N/A	\$ N/A
Credit card(s)	\$ N/A	\$ N/A
Department store(s)	\$ N/A	\$ N/A
Other: _____	\$ N/A	\$ N/A
Alimony, maintenance, and support paid to others	\$ N/A	\$ N/A
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ N/A	\$ N/A
Other (specify): <i>Payback monthly gift to parents where employed over years of lawsuit, yard work expenses</i>	\$ 900.00	\$ N/A
Total monthly expenses: <i>ink, paper, printers computers, postage, toothpaste, shampoo Soap. I go without as I cannot afford all I need.</i>	\$ 1,220	\$ N/A

6. State every person, business, or organization owing you or your spouse money, and the amount owed.

Person owing you or your spouse money

Amount owed to you

Amount owed to your spouse

N/A

\$ N/A

\$ N/A

N/A

\$ N/A

\$ N/A

N/A

\$ N/A

\$ N/A

7. State the persons who rely on you or your spouse for support. For minor children, list initials instead of names (e.g. "J.S." instead of "John Smith").

Name

Relationship

Age

N/A

N/A

N/A

N/A

N/A

N/A

N/A

N/A

N/A

8. Estimate the average monthly expenses of you and your family. Show separately the amounts paid by your spouse. Adjust any payments that are made weekly, biweekly, quarterly, or annually to show the monthly rate.

You

Your spouse

Rent or home-mortgage payment
(include lot rented for mobile home)

\$ N/A

\$ N/A

Are real estate taxes included? ☐ Yes ☒ No

Is property insurance included? ☐ Yes ☒ No

Utilities (electricity, heating fuel,
water, sewer, and telephone)

\$ N/A

\$ N/A

Home maintenance (repairs and upkeep)

\$ 40.00

\$ N/A

Food

\$ 0

\$ N/A

Clothing

\$ 20.00

\$ N/A

Laundry and dry-cleaning

\$ 30.00

\$ N/A

Medical and dental expenses

\$ 40.00

\$ N/A

9. Do you expect any major changes to your monthly income or expenses or in your assets or liabilities during the next 12 months?

☐ Yes ☒ No If yes, describe on an attached sheet.

10. Have you paid - or will you be paying - an attorney any money for services in connection with this case, including the completion of this form? ☐ Yes ☐ No

If yes, how much? No determination has been made at this time. Please See the attached exhibit Motion with one Exhibit thereto.
If yes, state the attorney's name, address, and telephone number:

11. Have you paid—or will you be paying—anyone other than an attorney (such as a paralegal or a typist) any money for services in connection with this case, including the completion of this form?

☐ Yes ☒ No

If yes, how much? _____

If yes, state the person's name, address, and telephone number:

12. Provide any other information that will help explain why you cannot pay the costs of this case.

My health has diminished. I have religious objections to not only healthcare, mental healthcare, but science too. See attached. Our founding Fathers relied on Enlightenment thinkers who made man and man's imperfect workable, removing a way to criticize and correct to prevent harming people for material gain. Our Democratic Republic is a better institution than our founders foresaw. The courts make us free.
I declare under penalty of perjury that the foregoing is true and correct.

Executed on: Feb. 10, 2024

I am eligible for food stamps.

Meghan Kelly
(Signature)

George Washington started the Global war 2 year war. The taxes the colonies protested related to the money to pay for war debt. The Bank of England is a slavery system I believe misleading people to hell by worship of money and material gain at the cost of human sacrifice. This nation decrees freedom, but our founders double

B I F P

EXHIBIT 43

Documents regarding improving healthcare while spending less money, to prevent taking advantage of the sick by killing or concealing illness to serve business greed. More money is the problem not the solution. Just decrees, and justice in the courts are the solution.

1. Coastal Point, Guest Column, Representative candidate says health is wealth, By Meghan Kelly, Esq., Candidate Delaware House of Representatives, 38th District
2. Document, "Your Health is your Wealth You are Priceless. Not a price tag! Kelly seeks Federal Consideration of Health Care Proposal
3. Meghan Kelly's teaching certificate, credibility
4. Meghan Kelly's redacted law school transcript to show she took a course Health Care Finance and the course Law and Medicine while attending Duquesne School of Law

5. Meghan Kelly's redacted undergraduate college transcript to show she took relevant courses related to

- a. History of Western Medicine
- b. Economics
- c. Medieval Philosophy
- d. Psychology courses

6. Evidence of the surgery that inspired me to study healthcare issues.

Due to the surgery referred to therein, I am (self) required to drink water, rest, exercise and eat. So, I do not faint or die due to dehydration when I have my period. I lose five pounds of water weight every month. This is still a challenge. I must assert my right to live because many people serve Satan by hardness of heart. Many do not want to be inconvenienced to care, to adapt to safeguard the lives and health of others, including my own. I am a child of God. My body is not my own. I am commanded to be holy because God is holy, to care for and treasure my body, and the lives and health of others too. "I am not my own." Other people are loved by God too.

Guest Column

Representative candidate says health is wealth

By Meghan Kelly, Esq.

Candidate, Delaware House
of Representatives, 38th District

My name is Meghan Kelly, Esq. I am a candidate for the House of Representatives in the Nov. 6 race in the 38th District. I am running, in part, because I have a desire to draft laws to create better health care for Delawareans, and I want to persuade the federal legislators to draft specific legislation to reduce the price of care instead of eliminating care to those who need it most by rendering it unaffordable.

I am uniquely qualified to propose solutions in this area as an attorney who studied the history of medicine at University of Delaware, and health care finance and health care law at Duquesne School of Law School. I even received a small scholarship for healthcare law.

So, I thank you for your kind consideration, as I truly care about serving the people in the community I grew up in, and love and protecting their life and health.

This week, I will write about improving health care concerning the state of Delaware. Next week, I will submit a suggestion to our federal legislators regarding making health care more affordable. Instead of reducing the

amount of care, I respectfully urge our federal legislators to reduce the price of care. Only they have the power to do so, I will not.

In Delaware, I specifically want to draft legislation to improve the quality of health care, instead of merely getting massive bad care. Funding is more easily received when health care entities and professionals are researching cutting-edge techniques, which is dangerous for patients since they are still working out the kinks.

Think of the National Institute of the Health (NIH), charities who accept funding from the army and NIH, and private research or health care entities who make money on analysis. So they can use patient's records to sell alleged health care miracles in bulk, based on data. Part of the HIPPA waiver we sign at each doctor's visit allows our information to be used in this scientific research. So, patients may be lawfully used as lab rats.

I want to draft legislation to prevent the abuses we have seen by doctors like Dr. Earl Bradley, who allegedly molested hundreds of children; repeal the involuntary sterilization statute; and make it easier to prevent doctor and health care abuse of patients for a buck...

I want to prevent doctors from prescribing addictive drugs under the facade of benefiting the patient, but in truth to benefit their own pockets, to keep patients coming back for prescriptions for their addiction, not for good health.

I want to stop doctors like the local Delaware doctor who used cutting-edge treatments, hip replacements, on people, including my father. He said everything was fine for years, despite readily available information to the contrary, to cover his own back, instead of serving the patients like my father, the legendary retired teacher, lifeguard and coach Pat Kelly of Indian River High School.

No care is better than bad care. Thus, I desire to create legislation to ensure our health care providers are taking care of the patients, not taking advantage of the patients for profit. Our laws serve money — not people, not patients.

I want to create laws that penalize health care professionals for drugging the elderly at the elderly homes to make them easier to tend, like vegetables. We need to value and respect our elderly, (not keep them in an institution for our convenience). These institutions should

See KELLY page A15

Kelly

Continued from page A14

be developed to serve and respect the elderly, not take advantage of them for a profit.

Now is the time to value human life and health more than money. Now is the time to hold health care professionals accountable for their bad choices to harm instead of heal patients.

I desire to repeal the involuntary Sterilization statute in Delaware under Title 16, Chapter 57 of the Delaware Code. There is too much incentive to sterilize people to use their stem cells for profit and research, instead of alleged need. Besides, the fact is sterilization is barbaric and arguably violates Delawareans' right to life, liberty and pursuit of happiness, despite the United States Supreme Court decision in *Buck v Bell*, 274 US 200 (1927).

I desire to amend the medical mal-

practice act. It is very difficult to correct doctors under this act. In Delaware, a patient has two years from the date of the medical provider's misconduct, if a patient is younger than 6, until the patient's sixth birthday. The time may be extended in limited circumstances — for instance, if a doctor left a foreign object in a patient's body.

In addition to the short statute of limitations, in Delaware, you also need to get another health care professional to give an expert opinion concerning the malpractice of the medical provider. This is very tough to get because doctors do not want to give an opinion against a peer when they know they are capable of mistakes or a sloppy job, too.

The requirements of the expert opinion are also hard to meet. So, a lot of lawsuits are kicked out for failure to adhere to the requirements. For instance, if an expert says the doctor's act was a substantial factor in causing the harm, the opinion will get kicked out. In

Delaware, the expert must state the "but for" the doctor's conduct the harm would not have occurred.

Overall, if a doctor messes up on you, you most likely will be out of luck. The longer you wait to pursue legal relief, the tougher it will be for the attorney to find an expert required to have a case.

It is important to correct doctors, as the treatment they provide may harm other people for life or kill them. Since it's so difficult to sue, it's hard to prevent further harm by showing how certain treatments make people worse off. That's why we must amend the medical malpractice act in Delaware. We must prevent further patient harm and deaths.

By electing me you will be electing a candidate that will fight for your life and health. You are priceless — more valuable than all the money in the world. By electing me, you will be electing someone who serves people, not greed.

Your Health is Your Wealth
You are Priceless. Not a price Tag!

Kelly seeks Federal Consideration of Health Care Proposal

My name is Meghan Kelly. I am an attorney running in the November 6, 2018 race for the House of Representatives seat in the 38th District, which includes Bethany Beach, Fenwick, Millville, Frankford, Ocean View, Selbyville and parts of Dagsboro.

I am running, in part, because I discovered I had a deep passion to change the laws to better serve people. I have had the opportunity to review proposed laws for more than ten years, starting at Richards, Layton and Finger, PA. I have proposed comments on legislation to other attorneys in different bar sections, such as Corporate Law, E-Discovery, Personal and Real Property. Each section votes by majority. Unfortunately, I always get voted out since I tend to seek what serves Delawareans better, instead of what is convenient and profitable to our own practice. So, I continued to look at alternative ways to improve the laws.

I made calls to legislators, met with people, sent emails and letters in an attempt to amend the laws. Unfortunately, I was not successful. Yet, every time I observed corruption, abuse or misuse of power, my desire to improve the laws grew stronger. So, I found myself paying the filing fee to run for office. So, here I am.

I am running for a state legislative position. Nevertheless, the point of this letter is to discuss a suggestion relating to affordable health care that I submitted to our **federal legislators** and **President Trump's Delaware liaison, Councilman Rob Arlett**, in an attempt to gain their kind consideration at the federal level. Only the federal legislators will be able to address this issue, I will not. I am printing parts of some emails I sent to Rob Arlett in hopes the **federal officials** will reduce the price of health care instead of eliminating care to those who need it the most by rendering it unaffordable.

"...President Trump's initial idea was brilliant. Focus on reducing the cost of care instead of indirectly eliminating care, due to the astronomical cost. I understand your concern about appealing to emotion, but I believe people will die if they cannot afford care, just like many did prior to 1986.

Prior to 1986, Emergency Rooms ("ERs"), were turning away pregnant ladies and people in need of immediate care, due to their lack of insurance and inability to pay. Babies had complications, lots of pregnant moms died. It created public outrage.

So, Congress enacted Emergency Medical Treatment & Labor Act (EMTALA) in 1986, by using its power under Article 1 Section 8 of the Constitution, (the spending power), to require all hospitals with Emergency Rooms accept all patients regardless of their lack of insurance and inability to pay. Congress attached strings to such entities, by requiring the ERs accept all patients if they receive **any** Medicare or Medicaid, or be penalized financially.

Similarly, Congress can create price ceilings for drugs or health care for any entity receiving Medicare and Medicaid. This will extend to uninsured people as well.

The National Institute of the Health (NIH), is another vehicle the federal government may use to

implement President Trump's initial plan. This entity provides grants and subsidies for drug research. The Federal Government through basic contract law may condition the acceptance of such money upon the drug company's agreement to price ceilings. Should the drug company not honor such ceiling, they may draft a provision requiring the company to pay all such money back in addition to a penalty." (citation to email omitted). Medical providers may still choose to reduce the price of care to stay competitive. The price ceilings prevent entities from rendering people worthless or too expensive to care for.

"Instead of indirectly taking away care from people who cannot afford it, let's make it more affordable for people. So, like you said, Americans can assume more responsibility and autonomy in their own care.

Artificial entities without hearts care more about the bottom line than those they serve, unless caring will affect the bottom line. Congress has the ability to affect the bottom line to reduce the cost of healthcare instead of eliminating care indirectly by making it unaffordable.

Healthcare is an inelastic good, a necessity, meaning no matter how rich or poor you are, you would probably give all you had, including your home, to pay for care to save the life of your child, a loved one, or even your own life. The demand does not change with price. This is an exception to normal market theories of supply and demand dictating prices. Artificial entities will get as much money as they can, at the expense of lives.

The board members are far removed from those they serve. They most likely are thinking about how they can afford to pay for their kid's schooling instead of the individuals they serve. Since they are focused on the bottom line," please use your power federal legislators to affect the bottom. (citations to email omitted). Only you have the power to do so, I will not.

The federal legislators have Medicare, Medicaid, NIH and other mechanisms of federal funding to use as bargaining chips. They should use the bargaining chips to reduce the price of healthcare (and improve care), instead of threatening to reduce Medicare, Medicaid, or take those chips away. What will they have left to bargain with if they take everything away.

Thank you for your kind consideration.

License No. 18929

Official Verification of Licensure Available at <https://deeds.doe.k12.de.us>

Issue Date: September 25, 2006
Effective Date:
Expiration Date:

State of Delaware

Department of Education

Initial License

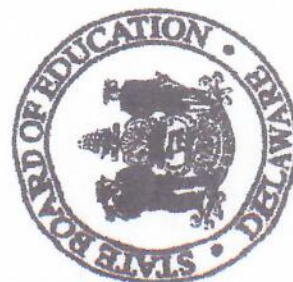
Know all persons by these Present, that

Meghan Marie Kelly, Esq.

has fulfilled the Licensure and Certification requirements of the Professional Standards Board and is certified in the following area(s):

- STANDARD: Teacher of Elementary Grades K-6 **
- STANDARD: Teacher of Exceptional Children Grades K-12
- STANDARD: Teacher of Health Education Grades 5-12
- STANDARD: Teacher of Middle Level Mathematics Grades 6-8 **
- STANDARD: Teacher of Physical Education Grades K-12
- STANDARD: Teacher of Social Studies Grades 9-12 (Valid 5-8 in a Middle School)

This is a valid license. This license will be activated upon employment with a Delaware Public School District/Charter School.



** Indicates Highly Qualified in content areas covered by this certificate

Each License Holder is Responsible for Knowing and Satisfying License Renewal Requirements Any Provisions Required to Reinstate His or Her License/Certificate


Secretary of Education

LAW Transcript

DUQUESNE UNIVERSITY

Record as of: 07/18/05

600 FORBES AVENUE PITTSBURGH, PA 15282-0299

MS. MEGHAN M. KELLY

Student ID: 0800035

DEGREE JURIS DOCTOR
MAJOR Juris Doctor - Day
MINOR

SEM	COURSE DESCRIPTION	DEPT	CAT	GRD	ATT	COMPL	G.PTS	SEM	COURSE DESCRIPTION	DEPT	CAT	GRD	ATT	COMPL	G.PTS
02/FAL	LEGAL PROCESS AND PROCEEDUR SEMESTER GPA = 2.5000 CUMULATIVE GPA =	LAW	C256	LC	3.00	3.00	7.5000	04/FAL	COMMERCIAL TRANSACTIONS I APPELLATE PRACTICE & PROCE SEMESTER GPA = 3.1667 CUMULATIVE GPA =	LAW	C446	LC+	3.00	3.00	8.2500
					3.00	3.00	7.5000				C414	LW	0.00	0.00	0.0000
													12.00	12.00	28.5000
	CONTRACTS	LAW	C13	LB	6.00	6.00	18.0000		CONFLICTS OF LAW	LAW	C32	LA-	3.00	3.00	10.5000
	PROPERTY	LAW	C14	LB+	6.00	6.00	19.5000		BANKRUPTCY	LAW	C65	LA-	2.00	2.00	7.0000
	TORTS	LAW	C105	LB	6.00	6.00	18.0000		FED COURTS & THE FED SYS	LAW	C01	LB+	3.00	3.00	9.7500
	CIVIL PROCEDURE I	LAW	C09	LB+	3.00	3.00	9.7500		ROMAN LAW	LAW	C144	LA	2.00	2.00	7.5000
	CRIMINAL LAW & PROCEDURE	LAW	C87	LC+	4.00	4.00	11.0000		COMMERCIAL TRANSACTIONS II	LAW	C448	LB+	3.00	3.00	9.7500
	LEGAL RESEARCH AND WRITING	LAW	C129	LA	3.00	3.00	11.2500	05/SPL	SEMESTER GPA = 3.4231 CUMULATIVE GPA =				13.00	13.00	44.5000
03/SPL	SEMESTER GPA = 3.1250 CUMULATIVE GPA =				28.00	28.00	87.5000								
	SEM CAUSE WRONGF CRIM CONV	LAW	C391	LA	2.00	2.00	7.5000		TOTALS CRED CPT = 86.00 CRED CALC = 80.00 GRD PTS = 257.5000 GPA = 3.2188						
03/SUL	SEMESTER GPA = 3.7500 CUMULATIVE GPA =				2.00	2.00	7.5000								
	LABOR LAW	LAW	C79	LB	3.00	3.00	9.0000								
	HEALTH CARE FINANCE	LAW	C204	LA	2.00	2.00	7.5000								
	EVIDENCE-SECT.B	LAW	C335	LA-	3.00	3.00	10.5000								
03/FAL	SEMESTER GPA = 3.3750 CUMULATIVE GPA =				8.00	8.00	27.0000								
	LAW AND MEDICINE	LAW	C42	LA-	2.00	2.00	7.0000								
	CONSTITUTIONAL LAW -SECT.B	LAW	C26	LB	5.00	5.00	15.0000								
	TAXATION	LAW	C10	LB+	4.00	4.00	13.0000								
	CORPORATIONS-SECT.B	LAW	C336	LB+	4.00	4.00	13.0000								
	FAMILY LAW	LAW	C76	LA-	2.00	2.00	7.0000								
04/SPL	SEMESTER GPA = 3.2353 CUMULATIVE GPA =				17.00	17.00	55.0000								
	TRIAL COURT CLERKSHIP	LAW	C242	LP	3.00	3.00	0.0000								
04/SUL	SEMESTER GPA = 0.0000 CUMULATIVE GPA =				3.00	3.00	0.0000								
	PROFESSIONAL RESPONSIBLIT	LAW	C36	LP	3.00	3.00	0.0000								
	ESTATES AND TRUSTS	LAW	C429	LB+	3.00	3.00	9.7500								
	TRIAL ADVOCACY	LAW	C91	LA-	3.00	3.00	10.5000								

RAISED SEAL NOT REQUIRED
This official University transcript is printed on Secured paper
and does not require a raised seal.

Patricia B. Jakub
University Registrar

MS. MEGHAN M. KELLY
29 SHAWNEE DRIVE
DAGSBORO, DE 19939

I studied healthcare law to
prevent bad care like the care I
received from hepatitis to others.

Name: Meghan Marie Kelly

SEX: FEMALE

DATE OF BIRTH: B11

DEPT ID: 06/11/02

TRANSCRIPT LEGEND

ACADEMIC YEAR

The University follows a semester plan. In addition to two semesters, a 5-week winter session and summer sessions offering 5-week and 7-12 week classes are held. The unit of credit is the semester credit hour which is generally based on one period (50 minutes) of lecture, laboratory or quiz, recitation, per week per semester. For another sessions the length of the period and/or number of sessions per week is increased to allow instructional time comparable to that in a regular semester.

University of Delaware adopted a 4+ grading system effective Fall 1991.

FINAL GRADES

Grading Legend

A	Excellent	4.00 per credit
A-	Good	3.67 per credit
B+	Good	3.33 per credit
B	Fair	3.00 per credit
B-	Fair	2.67 per credit
C+	Fair	2.33 per credit
C	Fair	2.00 per credit
C-	Fair	1.67 per credit
D+	Poor	1.33 per credit
D	Poor	1.00 per credit
D-	Poor	0.67 per credit
F	Failure	0.00 per credit
F	Failure - Academic Dishonesty	0.00 per credit
W	Withdrawal	0.00 per credit
W	Withdrawal - Unofficial	0.00 per credit
W	Withdrawal - Official	0.00 per credit
W	Withdrawal - Failing	0.00 per credit
W	Withdrawal - at time of withdrawal	0.00 per credit

TEMPORARY GRADES

Grading Legend

I	Incomplete	0.00 per credit
S	Satisfactory Progress	0.00 per credit
U	Unsatisfactory Progress	0.00 per credit
N	No Grade Reported by Instructor	0.00 per credit

COURSE NUMBERS

001-099: Undergraduate courses
100-199: Introductory level courses
200-299: Introductory/intermediate courses
300-399: Advanced courses
400-499: Graduate courses
500-599: Graduate courses
600-699: PhD level courses

Graduate credit is granted at the University of Delaware only to those students who are properly registered as formally admitted students in a graduate program.

FURNISHED AT REQUEST OF STUDENT
DO NOT REUSE TO OTHERS WITHOUT
CONSENT OF STUDENT

The word COPY appears when photocopied. A black and white document is not official.

EXAMINE THIS FLUORESCENT SIGNATURE
UNDER BLACK LIGHT FOR AUTHENTICITY

ASSOCIATE REGISTRAR

COURSE TITLE

ECOM-300 INTERMED MICROECONOMIC THEORY
EDST-201 DIVERSITY IN THE CLASSROOM
GEOG-101 PHYSICAL GEOGRAPHY
HIST-205 UNITED STATES HISTORY

Term Cumulative 12 108 12 101.00 12 39.000 3.250 311.667 3.117 998/3294

EDUC-304 ED PSYCHOLOGY: SOCIAL ASPECTS
EDUC-305 ED PSYCHOLOGY: COGNITIVE ASPECTS
GEOG-203 INTRO TO CULTURAL GEOGRAPHY
MATH-114 COLLEGE MATHEMATICS & STATISTICS

Term Cumulative 12 120 12 113.00 12 43.000 3.583 354.667 3.167 1363/4003

HIST-367 REEL HIST: HOLLYWOOD & AMER PAST
THEA-102 INTRODUCTION TO PERFORMANCE

Term Cumulative 12 126 12 119.00 12 21.000 3.500 375.667 3.184

CSCC-382 HISTORY OF WESTERN MEDICINE
HIST-268 SEM: IRELAND 1916-PRESENT
HIST-363 MEDIEVAL EUROPE: 1050-1350
PHIL-302 MEDIEVAL PHILOSOPHY
POSC-387 AMERICAN POLITICAL THOUGHT
THEA-200 INTRO TO THEATRE PRODUCTION

Term Cumulative 18 144 15 134.00 15 41.000 2.733 416.667 3.133 1714/4569

EDUC-420 READING IN THE CONTENT AREAS
HESC-368 COACHING TRACK & FIELD
HIST-368 MODERN CHINA: 1600-1920'S
HIST-440 SEM-AFRICA UNDER COLONIAL RULE
HIST-491 PLANNING A COURSE OF INSTRUCTION
POSC-380 INTRODUCTION TO LAW

Term Cumulative 14 158 10 144.00 10 35.000 3.500 451.667 3.159 1449/3931

OFFICIAL TRANSCRIPT
DELIVERED TO STUDENT

COURSE TITLE

EDUC-400 STUDENT TEACHING: SOCIAL STUDIES
HIST-493 PROB IN TCHG HIST & SOC SCI

Term Cumulative 12 170 12 144.00 12 0 0.000 0.000 144.000 0.000 1773/4517

Program Changed To: Spring 2001
Major: History
Requirements completed for Bachelor of Arts.

EDUC-400 STUDENT TEACHING: SOCIAL STUDIES
HIST-493 PROB IN TCHG HIST & SOC SCI

Term Cumulative 12 182 12 156.00 12 7.000 2.333 458.667 3.142 2032/4863

Western Medicine
Medieval Philosophy
I disagreed with Plato and Socrates. I think God is smarter.

MEGHAN MARIE KELLY
29 SHAWNEE DRIVE
DAGSBORO DE 19939

UNIVERSITY OF DELAWARE NEWARK, DELAWARE 19716-622

DATE OF ADMISSION: 11-1-95
DATE OF DISCHARGE: 11-4-95

BEEBE MEDICAL CENTER
424 SAVANNAH ROAD
LEWES, DELAWARE 19958
(302) 645-3300

DISCHARGE SUMMARY

FINAL DIAGNOSIS: Serous cyst of the left ovary with torsion.

HISTORY: She is a year old white female, Gravida 0, Para 0-0-0-0; whose last menstrual period was early October 1995. She was admitted for an exploratory laparotomy because of a large cyst in her left pelvic adnexa. She had abrupt onset of left lower quadrant abdominal pain on the morning of admission. She also had some nausea and vomiting.

PHYSICAL EXAM: She is a healthy white female in some distress. Blood pressure was 110/64. On the abdominal exam, the abdomen was flat, soft with hypoactive bowel sounds. Pelvic exam - The vagina showed normal mucosa. Cervix showed no inflammation. The uterus was midline and felt small. Adnexa on the right side was negative. The left side showed a large, irregular cyst. Rectal exam was confirmatory.

LAB DATA: Admitting CBC shows a hemoglobin of 15.2 gm/dl, hematocrit 43.3%. Serum pregnancy test was negative.

HOSPITAL COURSE: The patient had an exploratory laparotomy on 11-1-95 with excision of a large cystic left ovary plus the fallopian tube, both of which had torsion at their base. Postoperatively, the patient's hemoglobin was 12.9 gm/dl, hematocrit 35.5%. She had a normal postop course and was discharged on 11-4-95 to return to the office in two weeks.

NW/nas
dictated: 11-14-95
transcribed: 11-15-95
cc: Dr. Washburn

Newell Washburn
Newell Washburn, M.D.

DISCHARGE SUMMARY



Plan Now for When COVID-19 Assistance Ends

State of Delaware
Division of Social Services

June 9, 2022

C I F P

Your Case #:

~~2000000000~~

Questions? Contact:

A. MAINTENANCE811
POOL# 811
34314 PYLE CENTER RD
PYLE SSC UNIT 1
FRANKFORD DE 19945
(302) 732-1720
Fax: (302) 732-1721

To: MEGHAN M KELLY
34012 SHAWNEE DR
DAGSBORO DE 19939-4125



En Español

Si usted no entiende este aviso o necesita que se lo traduzcan, favor de Llamar al Departamento de Relaciones con el cliente al 1-800-372-2022.

Bằng Tiếng Việt

Nếu quý vị không hiểu được thông báo này hoặc cần được phiên dịch, xin gọi cho Ban Liên Hệ Khách Hàng tại số 1-800-372-2022.

The Division of Social Services (DSS) sent out extra emergency benefits and changed program rules during the COVID-19 public health emergency. COVID-19 assistance may stop in the coming months because the COVID-19 situation is getting better. Please start planning now for when COVID-19 assistance ends.

When the COVID-19 public health emergency ends:

- DSS COVID-19 emergency benefits and program changes will end.
- Regular DSS program rules will restart.

This means that in the coming months:

- Extra monthly emergency benefits will end for Food Benefits, Temporary Assistance for Needy Families (TANF), and General Assistance (GA).
- The Pandemic EBT (P-EBT) program and benefits will end.
- Employment and training requirements will restart for Food Benefits and TANF.
- Program time limits and sanction rules will restart for TANF.
- Regular application, interview, and eligibility rules will restart for Food Benefits.
- Monthly family copayments will restart for Child Care.

DSS does not know when the COVID-19 public health emergency will end. We will let you know the actual dates these changes will happen in another letter.

12534402891600010004

D I F P

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

Meghan Kelly	)	Civil Action No.: 1:21-1490 (CFC)
Plaintiff,	)	
v.	)	
Disciplinary Counsel Patricia B.	)	
Swartz, et.al	)	
Defendants.	)	

PLAINTIFF MEGHAN KELLY'S 159th AFFIDAVIT UPDATE CONCERN
23A607 DEPT. OF HOMELAND SEC., ET AL. V. TEXAS

Comes now Plaintiff Meghan Kelly, I declare and affirm that the foregoing statement is true and correct.

1. I do not feel so well at all.
2. I was looking through my old drafts I found emailed to myself. Attached please find a letter I never sent with information of present sense impression or belief.
3. Recall I filed the two motions the courts wrongly concealed to hide evidence of the state's violation of the rule of law.
4. Attached as exhibit 1 please find a letter I incorporate herein. The letter was never filed. Instead I filed two motions is subsequently sealed instead. Nevertheless, it is admissible under present sense impression exception. In the attached letter I asserted the following which is true:

“I also want to alert the court, judges, may be in trouble.

People have talked about “hanging the politicians” for years, taking the law into their own hands, under the guise of Godly freedom in Sussex County, Delaware. This talk has gone beyond words, as the nation saw on January 6, 2021, during an attempted coup.

Now, I recall overhearing someone talk that way about you, the judges. I forget if they called judges dictators or tyrants “in black robes,” under the guise of good, such evil.

I just remember getting upset when people talk about shooting politicians and shooting judges. I do not like people talking about shooting people at the border either. There is a scary dehumanization of people and valuing property more than humanity.

I believe holding the powerful, those with government authority, private wealth, or connections, accountable to the law, would deter unrest, and instill faith in the

judiciary system by teaching the world justice is not for sale by barter or exchange, but is handed out impartially with mercy and corrections to prevent condemnation and harm. No one is above the law, nor is anyone below the law, even a peon like me.

I see judges as potential life savers and eternal life savers. Justice with mercy is a command by God, a greater command per Jesus Christ, Citing Amos 5:15, Matthew 23:23. Not all people accept correction. Yet we should continue to instill hope not despair, 70 times 7. Matthew 18:22. Meaning, so long as there is life, we do not give up hope people can learn to do right by love for one another, not exploitation and harming others to serve the love of money”

5. The border crisis is a bigger Constitutional issue than I realized. I hear people say killing people at the border is the solution to chill them from entering. I heard this more than once enough to create red flags in my mind.

6. Please don't let that happen. The Courts must continue to prevent the people from unlawfully taking the law into their own hands to maintain a civilized government which is a respecter of all persons lives and liberties.

7. The Courts must continue to guide even misguided state and federal officials to resolve disputes as to what the Constitutional rule of law is.

8. On Monday January 22, 2024, the US Supreme Court granted the United States application in Application No. 23A607 *DEPT. OF HOMELAND SEC., ET AL. V. TEXAS* permitting the federal agencies to cut fence wires to prevent harm to life and health.

9. The Courts below ruled the federal government could not cut wire. *See, State v. U.S. Dep't of Homeland Sec.*, Civil Action DR-23-CV-00055-AM, at *28-29 (W.D. Tex. Nov. 29, 2023) (“While an ongoing medical emergency can justify opening the fence, the end of that exigency ends the justification. As a hypothetical example, cutting the wire to address a single individual's display of distress does not justify leaving the fence open for a crowd of dozens or hundreds to pass through. ”)

10. On or about January 24, 2024, the Governor of Texas Gregory Abbott declared an invasion to get around adhering to the highest Court's order, not to undercut the court's authority.

11. I believe Governor Abbott did this for a political reason in order to present a new case and controversy a different political theory compelling the US Supreme Court to consider in a Supplemental Brief in accordance with US Supreme Court Rules, or an additional petition by the US or new case and controversy. Under Supreme Court Rule 15 (8)

“8. Any party may file a supplemental brief **at any time while a petition for a writ of certiorari is pending**, calling attention to new cases, new legislation, or other intervening matter not available at the time of the party's last fling. A supplemental brief shall be restricted to new matter and shall follow, insofar as applicable, the form for a brief in opposition prescribed by this Rule.” [My petition for rehearing on denial of petition for writ of certiorari was pending when I submitted the November 6, 2023 filing before the US Supreme Court in the PA case]

12. Abbott seeks to argue the Constitution Article I, § 10, Clause 3 supersedes federal regulatory laws by declaring his Constitutional authority to fend off an invasion to rebut the US's arguments.

13. It is the court who determines what the Constitution says. It is for the parties to persuade the courts in a case and controversy. I do not want any lives lost or for President Biden to send forces to fight state militias. We use the rule of law which is administered through the courts to combat lawlessness.

14. In order to have a case or controversy it must be ripe, even for a Supplemental Brief. That is why the Governor violated the Order to create more arguments. The Governor of Texas asserts the Constitution supersedes federal statutory law, and that his asserted authority under the Constitution is legitimate. That is debatable as applied.

15. This is an important issue to address and not ignore. Courts should never weigh which Constitutional power is more important instead it should look at the underlying rights it protects supremely life and liberty not money or property.

16. Those who teach jobs, money and property matters most and is what gives lives teach a lie misleading people to harm others for moth and rust at the cost of losing their own souls in the fires of hell per Jesus. Matthew 6:24.

17. Congress errs like lazy beautiful people with big smiles who seek to be served and liked to get reelected as opposed to serve. Congress people misbehave by delegating money and their work to agencies and unelected bureaucrats who draft and enforce laws instead of sitting down to resolve the problem not with money making the problem profitable to contractors but by using their brains. They refuse to unhardened their heads and hearts. The Courts cannot do their job for them but I hope the court takes away their scapegoats by rendering it unconstitutional for agencies to draft rules or judge matters in place of the legislative and judiciary branches

18. When everyone's hands are dirty, the courts are charged to clean their hands not to throw away people who erred in their choices.

19. There are considerations regarding an invasion that must be determined by the brilliant minds of people judges, not with money or military might. Please note, the conclusions may create precedent which will influence the 30 30 agenda where the federal statutes and executive agreements grant the UN entities and UN individuals allodial title and immunity. May the states, federal government or the people argue invasion down the line to prevent an overthrow. I am under the impression 30 percent of the world is the first not last step which may make part of our country no longer independent or free but controlled by outside powers to profit off of.

20. I am cognizant that there is a global agenda to reduce crop yields artificially by lawless people who seek to control a no longer free people by enticing people's desires with scientific conditioning by controlling people through social, economic or physical conditioning. There is an agenda to entice animosity against migrants to reduce food supply or access to food in our country, Europe and other countries to allow those with larger resources to control the populace with price hikes to bend their will, including Bill Gates.

21. The history books will likely aver the animosity against immigrants contributed to the hyper-inflation of food when in reality it was intentionally designed by those who use evil psychology to control the people. Recall I have religious objections to mental health and psychology. I believe people go to hell for even thinking or believing psycho theories as truth like the self-fulfilling prophesy. The premise of mental health scientific theories is that conditioning through environmental, genetic, chemical, economic, social conditions controls humanity. My God teaches that is a lie. God teaches we have free will no matter the substantial burdens those who reflect who reflect image of Satan exert, regardless of intent or ignorance, to control a no longer free but for slave people. I believe people commit sin by blindly doing the standardized practice that causes oppression, or other harm when their desire for money and material gain to provide for their own prevents them from seeing clearly to care for and not exploit others. That is the mark of the beast. Even children will go to hell for their unconcern at oppression per Ezekiel Chapter 9, also see Chapter 8 concerning atrocities.

22. Not knowing, not caring to know in order to love, believing a lie as truth, misunderstanding, confusion, and lack of knowledge are why people perish in hell per the Bible when it causes them to harden their hearts and heads. *See Matthew 13, Hosea 4:6 and 2*

Corinthians 4:4. People judges can unhardened heads and hearts by guiding those misguided by the Constitutional application to the rule of law.

21. Not all people reflect the image of the natural man without eternal life by living based on desires to be controlled not free by those who entice their desires by lawless people reflecting the image of the devil while at times protected under the color of the law by government collusion or partnerships. Not all people live based on conditions. Some lay down their desires and the desires of man to do what is right by choosing to unconditionally love instead of giving into natural desires, aka temptations.

22. Any time someone says trust the science, professional, product or service, I don't. Any time someone says science, they mean marketing to sell people their idea or product. Any time someone says science it may mean they seek a patent to screw people by involuntary slavery to pay for government grants or contracts for wicked research in a forced slave market where competition is stifled by defamation and patent suits that protect subpar goods and services made to maintain pain to sustain profit streams or even new or different research or wicked fundraising money.

23. I sincerely believe people commit lawlessness by fundraising on behalf of entities or conditional issues and by using humans in science to maintain profit streams or for other material gain even knowledge to allegedly sell a life-saving product which we may later find did more harm. I believe they will go to hell even if they gain knowledge or other material gain for sacrificing the lives and health of people or for using people as human capital.

24. Human sacrifice is wrongly protected by unjust laws to serve the mark of lawlessness leading to certain death in hell. I am tired of it.

25. I see how the system is rigged. I see how the new system is rigged to eliminate the system to eliminate the rule of law.

26. I seek to unrig the system to preserve the rule of law that saves lives and eternal lives.

27. I am very concerned about threat of violence on the boarder. I hope the US Supreme Court prevents the situation from escalating where people hurt others only to harm themselves.

28. If it does escalate, do not despair. So long as the people have the first amendment right to petition in an actual case and controversy with standing the courts maintain authority to quell violence and worse. The people's most powerful check is not the vote but the First Amendment right to petition.

29. The courts not the other two branches protect individual liberty and grant us a democracy in our democratic republic.

Thank you.

Respectfully submitted,

Dated 1/26/2024

Meghan M. Kelly

Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com

Under Religious objection I declare, affirm that the foregoing statement is true and correct

Dated:

Jan. 26, 2024

Meghan Kelly
(printed)

Meghan Kelly
(signed)

4 1 1

MEGHAN MARIE KELLY, ESQUIRE

April 20, 2021

**RE: Due Process, First Amendment and Equal Protections
Concern/State Agents**

Dear Honorable Justices of the Delaware Supreme Court:

I must alert this Court to actions by state government agents taken to apparently impede and obstruct my access to the Courts in this proceeding. I object to such interference, and reserve these issues for appeal, mentioned in part in Exhibit 55, attached to my notice, and mentioned below, incorporated herein as if part of this letter, and in my brief.

The First Amendment prohibits state officials from retaliating against Claimants, such as myself, for exercising their right of access to the courts.

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

A representative of the Chancery Court staff misled me into almost missing my deadline to file a notice of Exception. See, Docket 54, *December 1, 2020 letter, regarding Due Process concerns*, also contained in Docket 90, combined with Docket 36, attached to the notice as Exhibit F-Exhibit 55.

The representatives at the Chancery Court demeaned me apparently based on poverty, association or religious beliefs. See, Id.

I asked the Master for her help. She kindly helped me.

In addition, the ODC impermissibly interfered with this case by contacting Judge Clark. In mid-April, Judge Clark appeared to threaten me at BJ's, a store, located in Millsboro, Delaware, as if I was on trial for standing up for my faith in Jesus, solely based on my exercise of seeking relief in court based upon alleviating the government sponsored burden government-religion has caused on my free exercise of religion in the action below.

The ODC and Judge Clark clearly violated or encouraged the violation of the judicial Code of Conduct, by seeking to use their government power to obstruct my case, showing partiality to the Defendant, the President of the United States.

“Supreme Court's two-step *Saucier analysis* governs whether a government official is entitled to qualified immunity, considering: (1) whether the facts alleged by the plaintiff show the violation of a constitutional right, and (2) whether the right at issue was clearly established at the time of the alleged misconduct.” *Werkheiser v. Pocono Twp.*, 780 F.3d 172 (3d Cir. 2015).

Judge Clark knew or should have known that seeking to use his cloak of government authority, as a respected, fair judge, to chill or condemn or interfere with my ability to bring this case without government retaliation or pressure violates the Delaware judicial Code of conduct. See, *The Delaware Judges Code of Judicial Conduct*, Canon 1, “A judge should uphold the integrity and independence of the judiciary,” Canon 2, “A judge should avoid impropriety and the appearance of impropriety in all activities,” Canon 3. “A judge should perform the duties of the office impartially and diligently,” Canon 7, “A judge should refrain from political activity inappropriate to the judge's judicial office.”

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

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.

I am permitted to believe differently than the government through its agents, even if what Jesus teaches seems foolish to the world. 1 *Corinthians* 1:18, 2:14-16.

“Government official's conduct violates “clearly established” law, so that the official is not entitled to qualified immunity, when, at the time of the

challenged conduct, the contours of a right are sufficiently clear that every reasonable official would have understood that what he is doing violates that right.” *Id.*

I do not wish to have any disciplinary action against any of the government representatives for misconduct. I desire fair access to the courts, without government persecution based on my exercise of redressing a grievance to alleviate the burden upon my free exercise of religion from Government sponsored religious persecution directly caused by government establishment of government-religion and government-religious views.

I object to disparate treatment based on religious affiliation, and reserve the issue for appeal on due process, first amendment and equal protection grounds.

I also want to alert the court, judges, may be in trouble.

People have talked about “hanging the politicians” for years, taking the law into their own hands, under the guise of Godly freedom in Sussex County, Delaware. This talk has gone beyond words, as the nation saw on January 6, 2021, during an attempted coup.

Now, I recall overhearing someone talk that way about you, the judges. I forget if they called judges dictators or tyrants “in black robes,” under the guise of good, such evil.

I just remember getting upset when people talk about shooting politicians and shooting judges. I do not like people talking about shooting people at the border either. There is a scary dehumanization of people and valuing property more than humanity.

I believe holding the powerful, those with government authority, private wealth, or connections, accountable to the law, would deter unrest, and instill faith in the judiciary system by teaching the world justice is not for sale by barter or exchange, but is handed out impartially with mercy and corrections to prevent condemnation and harm. No one is above the law, nor is anyone below the law, even a peon like me.

I see judges as potential life savers and eternal life savers. Justice with mercy is a command by God, a greater command per Jesus Christ, Citing *Amos 5:15*, *Matthew 23:23*. Not all people accept correction. Yet we should continue to instill hope not despair, 70 times 7. *Matthew 18:22*. Meaning, so long as there is life, we do not give up hope people can learn to do right by love for one another, not exploitation and harming others to serve the love of money.

Dated: April 20, 2021

Respectfully submitted,

/s/Meghan Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
Pro se, Party, not an attorney
advocate in this matter
Not available by phone
(Word Count 964)

(ORDER LIST: 601 U.S.)

MONDAY, JANUARY 22, 2024

ORDER IN PENDING CASE

23A607 DEPT. OF HOMELAND SEC., ET AL. V. TEXAS

The application to vacate injunction presented to Justice Alito and by him referred to the Court is granted. The December 19, 2023 order of the United States Court of Appeals for the Fifth Circuit, case No. 23-50869, is vacated.

Justice Thomas, Justice Alito, Justice Gorsuch, and Justice Kavanaugh would deny the application to vacate injunction.



GOVERNOR GREG ABBOTT

January 24, 2024

The federal government has broken the compact between the United States and the States. The Executive Branch of the United States has a constitutional duty to enforce federal laws protecting States, including immigration laws on the books right now. President Biden has refused to enforce those laws and has even violated them. The result is that he has smashed records for illegal immigration.

Despite having been put on notice in a series of letters—one of which I delivered to him by hand—President Biden has ignored Texas’s demand that he perform his constitutional duties.

- President Biden has violated his oath to faithfully execute immigration laws enacted by Congress. Instead of prosecuting immigrants for the federal crime of illegal entry, President Biden has sent his lawyers into federal courts to sue Texas for taking action to secure the border.
- President Biden has instructed his agencies to ignore federal statutes that mandate the detention of illegal immigrants. The effect is to illegally allow their *en masse* parole into the United States.
- By wasting taxpayer dollars to tear open Texas’s border security infrastructure, President Biden has enticed illegal immigrants away from the 28 legal entry points along this State’s southern border—bridges where nobody drowns—and into the dangerous waters of the Rio Grande.

Under President Biden’s lawless border policies, more than 6 million illegal immigrants have crossed our southern border in just 3 years. That is more than the population of 33 different States in this country. This illegal refusal to protect the States has inflicted unprecedented harm on the People all across the United States.

James Madison, Alexander Hamilton, and the other visionaries who wrote the U.S. Constitution foresaw that States should not be left to the mercy of a lawless president who does nothing to stop external threats like cartels smuggling millions of illegal immigrants across the border. That is why the Framers included both Article IV, § 4, which promises that the federal government “shall protect each [State] against invasion,” and Article I, § 10, Clause 3, which acknowledges “the States’ sovereign interest in protecting their borders.” *Arizona v. United States*, 567 U.S. 387, 419 (2012) (Scalia, J., dissenting).

The failure of the Biden Administration to fulfill the duties imposed by Article IV, § 4 has triggered Article I, § 10, Clause 3, which reserves to this State the right of self-defense. For these reasons, I have already declared an invasion under Article I, § 10, Clause 3 to invoke Texas’s constitutional authority to defend and protect itself. That authority is the supreme law of the land and supersedes any federal statutes to the contrary. The Texas National Guard, the Texas Department of Public Safety, and other Texas personnel are acting on that authority, as well as state law, to secure the Texas border.

A handwritten signature in black ink that reads "Greg Abbott".

Greg Abbott
Governor of Texas

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 160th Affidavit

I, Meghan M. Kelly, Esquire, hereby certify on Jan. 26, 2024 I had a true
and correct copy of the above referenced document, served to Defendants, through their
counsel through email electronically:

Zi-Xiang Shen
Delaware Department of Justice
820 North French Street
6th Floor
Wilmington, DE 19801

Respectfully submitted,

Dated Jan. 26, 2024

Meghan M. Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com

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.

Dated: Jan. 26, 2024
Meghan Kelly (printed)

Meghan Kelly (signed)

E I F P

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

Meghan Kelly	)	Civil Action No.: 1:21-1490 (CFC)
Plaintiff,	)	
v.	)	
Disciplinary Counsel Patricia B.	)	
Swartz, et.al	)	
Defendants.	)	

PLAINTIFF MEGHAN KELLY'S 93rd AFFIDAVIT

Comes now Plaintiff Meghan Kelly, I declare and affirm that the foregoing statement is true and correct.

1. I am still drafting a complaint against Biden per the attached, and intend to file something to make the government fund all branches not merely two. This issue is capable of repetition and yet evading review. I think the Court should rule it unconstitutional under the Equal protection's component of 5th Amendment and the 13th Amendment right against involuntary servitude without bartered for pay to fully fund the members of the executive branch and Congressional branch while failing to pay members of the judiciary branch for work done.

2. I apprised this court debt is against my religious belief. Money is currently coined to enslave people and the government to debt.

3. The US Supreme Court held the greenbacks President Lincoln coined which were made by Congressional authority were lawful and Constitutional in Knox v Lee, 79 U.S. 457 (1871).

4. Thus the Congressional authority granted to Janet Yellen to coin money without debt and interest to fully fund the courts should be held Constitutional.

5. What is not Constitutional is the violation of the equal protection clause by paying two branches and leaving the courts unpaid to work by compelled involuntary servitude without pay under the risk of losing a position they may not be paid for.

6. I am really freaked out. I have to include more facts than I realized and supply more papers in this appeal to defend my life and liberty against potentially even the US Supreme Court should they seek to sue me to by finding my religious beliefs repugnant.

7. I have to do what is right, not for what is convenient to others which I believe damns people to hell.

Thank you for your time and consideration.

Dated 9/30//23

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

Dated:

9/30/23

Meghan Kelly (printed)

[Signature] (signed)

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

Meghan Kelly	)	Civil Action No.:
Plaintiff,	)	
v.	)	
JOSEPH BIDEN,	)	
President of the United States,	)	
in his official capacity,	)	
and,	)	
JANET YELLEN, Secretary of Treasury,	)	
in her official capacity	)	
Defendants.	)	

Plaintiff's Complaint to enjoin Defendants from failing to pay federal government and from suspending the operations of the federal government on the ground Congress has not passed a budget by or before September 30, 2023, and for a writ of mandamus to require Biden and Yellen to coin money under 31 U.S.C. § 5112 (k) without debt or interest and without regard to the private entity the Federal Reserve

1. Plaintiff Meghan Kelly, Esq., pro se pursuant to FRCP 65 and Act and 28 U.S.C. § 1651(a), asks this court to enjoin the President Joseph Biden, in his official capacity as the President of the United States, and Janet Yellen, in her official capacity as Secretary of Treasury, (collectively "Defendants"), from not paying federal workers and from suspending the operations of the federal government on the ground Congress has not passed a budget by or before September 30, 2023 on 1st, 5th, 13th and 14th Amendment grounds and further requests this Court sign a writ of mandamus to require Defendants to coin money without interest or debt under 31 U.S.C. § 5112 (k) to pay off the national debt in full or in the alternative to pay for federal employees and the operations of the federal government for all sums exceeding the budget shortfall and states as follows:

Parties

2. Meghan Kelly is an attorney in the state of Delaware whose license is placed on inactive/disabled but for her exercise of her private 1st Amendment right to petition to sue former

President Donald J. Trump in the Delaware Chancery Court to alleviate a substantial burden upon her religious exercise under the RFRA and to dissolve the establishment of government religion. I am currently seeking to appeal judgments, and a dismissal of a civil rights case. I must safeguard my only hope of a savior to preserve my Constitutional freedoms, the courts.

3. Defendant Joseph Biden is the President of the United States (“Biden”). He is a resident of the state of Delaware and may be sued in his official capacity through the local US Attorney General David Weiss, Esq. located at Hercules Building, U.S. Attorney's Office, 1313 N Market Street, PO Box 2046, Wilmington, DE 19801.

4. Defendant Janet Yellen is the Secretary of Treasury (Yellen). Defendant Janet Yellen is the Secretary of the Treasury of the United States and, in that position, is responsible for financing the federal government's operations. She may be served through the US Attorney General David Weiss located at Hercules Building, U.S. Attorney's Office, 1313 N Market Street, PO Box 2046, Wilmington, DE 19801.

Venue

5. Venue is appropriate since Plaintiff Kelly is a resident of Delaware under 28 U.S.C § 1391 (e) (c).

Jurisdiction

6. This Court has jurisdiction pursuant to 28 U.S.C. § 1331.

Background

7. In 2016 I discovered non-attorney out of state title companies were practicing real estate law without a license messing up the chain of title at the Recorder of Deeds, taking

advantage of attorneys like my esteemed deceased colleague Richard Goll, Esq, and losing income tax for the state of Delaware for business performed out of state, despite my religious objections to taxes.

8. I learned attorney disciplinary rules do not restrain non-attorneys and non-judges such as out of state title companies from practicing law without a license.

9. So, I ran for office in 2018 in hopes to prevent non-attorneys from practicing law without a license to prevent harm to the public.

10. I lost the election, but I learned there is a real agenda to eliminate people judges and people lawyers required to uphold the individual exercise of private Constitutional rights from being eliminated or sacrificed by the marketed or bought, but not actual majority's represented choice, through the vote. See the Exhibits attached hereto and incorporated herein.

11. There is evidence of an agenda to eliminate judges' authority to uphold justice in the courts to be supplanted by injustice through a global agenda to implement a carbon credit debt system through the central banks and other entities who create or control money or debt through digital currency, blockchain or other means to enslave a no longer free people to bend their will to the control of those who control the resources unrestrained by the just rule of law.

12. There is evidence of a schemed slow overthrow of these United States by private and foreign government backed partners taking over the government's authority, to recoup or control resources owed to it by the government through treaties, executive orders, grants or contracts or other exercise of government authority, in order to control the government by controlling the resources to eliminate the government's power to restrain businesses, charities,

banks, not for profits, churches or other entities from enslaving, oppressing, killing, stealing or destroying human life, liberty or health by the just rule of law.

13. There is evidence of a non-violent intentionally schemed rebellion to overthrow the government by eliminating the rule of law and the authority by the judiciary by those the government owes the private and foreign partners, including but not limited to the Federal Reserve, World Bank, IMF in my attempt to require congress coin money without debt and interest to eliminate slavery to safeguard Constitutional freedoms to buy and sell by free not government backed private or foreign choice through currency controlled by those who gain more the worse off we are in.

14. I also seek to dissolve any and all executive orders with the WHO, UN, and any other global entity or agreement this court may deem a threat to national security due to elimination of independence by compromised corrupt collusion with foreign or private entities which eliminate Constitutional liberties by compelled, conditional, compliance. Executive orders creating relationships with global entities eliminate the United States independence that is required to make us free not compromised, corrupt and enslaved to global wicked interests of those who control the resources to rule over people, not adhere to laws protecting their liberty.

15. To maintain our independence that make us free this Court must dissolve the executive orders granting relationships with the UN, WHO and maybe more organizations.

16. To maintain our independence that make us a free people protected by the Constitutional rule of law this court must also dissolve government private relationships and partnerships. No grants or contracts should be given to any private or foreign entity as this creates a forced and unfair market that makes private and foreign partners above the law and the

people for sale slaves in a fixed subpar economy where standards harm and exploit people to serve profit, positions and power under ordered control.

17. Under the lie of welfare, security and safety compelled conditional compliance to nongovernment entities within and outside of the US as opposed to the Constitutional provisions of safeguarding people's lives and liberty, the executive orders and private partnerships create the threats and harm to sustain their positions, power and streams of profit. The relationships eliminate freedom by ordered control.

18. Impartiality by the President is required under the 5th Amendment Equal Protections component. When the President corrupts the government by compromising the independence of this country to the collective, conditional, collaborative aims of organizations whose focus is eliminating freedom by economically, or physically compelled conformity ordered control elimination of freedom is the aim.

19. The Fourteenth Amendment section 4 provides in part, "But neither the United States nor any State shall assume or pay any debt or obligation incurred in aid of insurrection or rebellion against the United States, or any claim for the loss or emancipation of any slave; but all such debts, obligations and claims shall be held illegal and void."

20. All of the money owed by the Federal government to private and foreign partners including but not limited to the Federal Reserve, and global banks, including the BIS, IMF, World Bank are debt and obligations incurred in aid of a non-violent insurrection to overthrow the government by indebting to enslave to control a no longer independent government and its people, and may arguably be deemed illegal or void.

21. Yet, the schemed overthrow of the government may be prevented should the government coin without debt and interest to eliminate and discharge by payment debts owed.

22. The Federal Reserve's creation of debt and interest on debt through interest rates for every dollar the Treasury prints out of slavery debt is illegal as in violation of the 13th Amendment by involuntary compelled servitude and my First Amendment right to religious belief and exercise of religious beliefs.

23. The Federal Reserve is a private corporation, containing banks as shareholders. In their private capacity as banks, the worse off the people are, the more money they create out of debt they may sell people and the government to gain not only profit in terms of the debt created owed for lending out what they did not physically have, but profit on interest.¹ There is

¹ *Hubbard v. Fed. Rsrv. 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 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

aa conflict of interest since central banks like the private federal reserve gain more power, importance in position, and private profit the worse off the Country and the American people are. The shareholding banks of the federal reserve 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 are global plans alluded to by the World Economic Forum members (“WEF”) and participants of the World Government Summit (“WGS”) to create more waste, to create more debt, to gain more profit on debt for banks, and artificial need to serve business greed to private and foreign partners to fund research, contracts, grants, and carbon credits or debts, under the pretty name of science, to maintain debt control over the world.

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.”)

¹ *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.*, 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.”).

24. While the shareholders or members of the Federal Reserve are private persons, they appear to gain the benefits of federal employees, such as retirement, while not being subjected to the liability in the form of federal limits. The Federal Reserve is not the Federal government, though I should like the Courts to find every entity the government delegates grants, contracts or authority to as government agents not protected by the Constitutional limits including the contract's clause, and US Amend XIII, instead limited by them, having reduced freedoms to safeguard the public under the supreme law of the land the Constitution.

25. The Federal Reserve is a private corporation ruling as opposed to governing and guiding due to Congress's delegation of its authority to control currency as a product to maintain its power, position and profit by barter or exchange. This entity exploits the people and the government to control and enslave the people by controlling the value of money under the deception of caring for the people.

26. The Federal government issues paper currency, officially called Federal Reserve notes and commonly called cash. A Federal Reserve note is an IOU from the Fed to the Federal Reserve. As such, it is a liability on the Fed's balance sheet.

27. The government through the treasury issues money, called federal reserve notes in the physical form of dollars or coins and gives them to the Federal Reserve for use by its bank members upon the Fed's request, while increasing debts of the government to enslave a no longer free people to pay back the free lunch for the banks' members' gain.

28. 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 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.

29. This 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. Securitized property is schemed to be recouped by the banks when increases in taxes make it unaffordable to pay off tax liens. The Banks then recoup resources and property to give it those the banks, including the Federal Reserve owes. The members of the federal reserve do not lose their own personal assets, it is the people's securitized assets and the deposits in the banks that may be lost, despite the limited protection FDIC purports to give.

30. 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.

31. 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.

32. The way money is coined is the problem. The new digital currency is a worse problem that exacerbates and substantially burdens Constitutional freedom by slavery debt to the government backed private partners. I should like this Court to require Defendants to coin lawfully at all times, but during this emergency Complaint I humbly request this Court compel Defendants to coin money without debt and interest under 31 U.S.C. § 5112 (k) to pay off the

national debt in full or in the alternative to pay for federal employees and the operations of the federal government for all sums exceeding the budget given the exigent circumstances.

33. The Federal reserve members and the banks eliminate freedom by substantially burdening the will of the people by creating money out of debt slavery and controlling interest rates. I am a Christian. I believe people Janet Yellen and President Biden not only violate the US Amend XIII by enslaving the government and its people to Central banks and banks through fractional reserve, I also believe they violate God's laws as a Christian.

34. Debt slavery is against my religious belief. I believe Jesus when he teaches "you cannot serve God and money." Matthew 6:24. Those who make money their master and savior in place of God are evil to be damned to hell, because their love for money even through fundraising and charity drives out their love for one another replaced with the mark of the beast that this Court may erase should it require the government to coin lawfully. My God teaches people go to hell for charging debt in interest. Making money out of nothing with no value other than slavery debt plus interest is a far greater sin which the Federal Reserve commits. See, Ezekiel 18: (" He lends at interest and takes a profit. Will such a man live? He will not! Because he has done all these detestable things, he is to be put to death [in hell, the Second death]; his blood will be on his own head.")

35. I do not want people to go to hell. I believe the courts have the power to not only save lives but eternal lives too. I believe that the founders were imperfect fallible and even scheming men. I believe judges reflect the image of God when they care to think things out in order to do what is right by guiding misguiding people and protecting even those they are correcting.

36. Jesus teaches most people will go to hell on judgment day. Matthew 7:13-15. Jesus teaches many people think they follow him, but they are misled which is sad. See Luke 13:23-28. I believe judges in courts can help the blind see, and prevent them from going to hell. Ignorance is not innocence and people go to hell for not caring to know in order to love. I believe people judges can help them know to allow them more opportunity to turn away from living based on desires, sins, to lay down their desires to think things out to do what is right.

37. Presidents Lincoln, Jackson and Kennedy all proposed coining money without slavery debt to uphold the freedoms of the people. President Jackson misbehaved on how treated Indians, but he was correct about the banks.

38. 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 debt or interest, albeit after he was murdered it was withdrawn.

39. 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.

40. President Kennedy's Order creating money without enslaving people to pay it back like Lincoln.

41. The law authorizing the Treasurer to coin the trillion dollar platinum coin looks similar to the mere executive order President Kennedy signed which he was apparently killed for. Kennedy's Executive Order was withdrawn after his death. Executive Order 11110 was issued by U.S. President John F. Kennedy on June 4, 1963. This executive order amended Executive Order 10289 (dated September 17, 1951) by delegating to the Secretary of the Treasury the president's authority to issue silver certificates under the Thomas Amendment of the Agricultural Adjustment Act, as amended by the Gold Reserve Act. Kennedy allowed money to be coined without debt or interest.

42. Congress passed a law that allows the Secretary of the Treasury to coin money through the platinum bullion without debt and interest by her discretion, not the Federal Reserve. 31 U.S.C. § 5112 (k) provides: “(k) The Secretary may mint and issue platinum bullion coins and proof platinum coins in accordance with such specifications , designs , varieties , quantities , denominations , and inscriptions as the Secretary, in the Secretary's discretion , may prescribe from time to time”

43. Janet Yellen the Treasurer also indicates she would refuse to coin the platinum coin per the attached articles admissible under the periodical exception and admissions by a party opponent. It is true every note of money we have is an I owe you to slavery debt plus interest to those who lend out what they do not have placing our national security at risk to those who have more power or profit the worse off we are the Federal Banks and the banks. Yet, this Court must direct her coin this without debt or interest owed to the Federal Reserve to preserve these United States by fully funding the federal employees who make up the federal government and the one potentially weakened unfunded branch the Courts. This Court must direct Defendants to coin money without regard to the fact every dollar says Federal Reserve Note, and without regard to

the fact the Federal Reserve private bank may not accept it. This Court must direct Biden and Yellen to coin money without regard to the Federal reserve's desire for slavery debt control and profit. I care about sustaining these United States from a schemed agenda to overthrow it by allowing the private partners to assume Corporate governance and desired hyperinflation to allow private entities the Federal government is wrongly enslaved to owe recoups to control resources to control the government to eliminate the government after 2050.

44. This Court must require Defendants to issue Federal reserve notes to pay off debt and federal workers salaries owed using the trillion dollar coin must without liability for the printed money so coined to the master private Federal Reserve Bank who coins to enslave and control not to safeguard freedom. The government should not owe the Federal Reserve who gives it what it does not have while enslaving the people to pay it back. The 16th Amendment was enacted to tax the people to pay the interest on the debt the federal reserve enslaves the government and the people to.

45. This court must require Biden and Yellen to coin the money without acceptance by the federal reserve, which creates slavery debt and without enslaving the people to interest and debt.

46. Slavery is against my 1st Amendment protected religious beliefs and violates the 13th Amendment.

47. The failure to pay federal workers, including but not limited to federal judges, judicial staff, US Attorney Generals, FBI, CDC and other federal agencies in a government shut down by compelled force where there is no meeting of the minds is involuntary servitude and compelled slavery.

48. According to the BBC news released 9/26/23,

“The president of the United States has a guaranteed income. Congress is also not affected - its members are exempt and, in any case, its funding bill has already been approved. The US Department of Justice is among those affected - with many lawyers and judges not working during a shutdown. Others are working without pay.” Citing, <https://www.bbc.com/news/world-us-canada-46927916>, BBC News, *What is the likelihood of a US government shutdown?*, By Tom Geoghegan, 9/26/23 (Under periodical exception).

49. The shut down threatens to weaken only one of the three branches of government whereas the President and Congress are fully paid in violation of the 5th Amendment’s Equal Protections component by disparate treatment as to which representatives in the federal government may be paid, which endangers me in particular as a party one. My religious belief requires I uphold the impartial implementation of justice in the courts, which includes safeguarding the judiciary from being weakened and in want of pay for labor performed.² See *Romans 4:4*.

² I am a Christian. I place my faith in God the father, the son Jesus, and the Holy spirit revealed to me, born again people, including people in the Bible. “Justice in the courts” is a command” Citing, the Bible, Amos 5:15 Jesus teaches justice and mercy are greater commands than monetary and material laws . Matthew 23:23; see also, John 7:24 (Jesus commands “Do not judge based on appearance, judge correctly.”) (See the following Bible passages against partiality in the courts, 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"); (Exodus 23:6, "You shall not deny justice to the poor in their lawsuits."); (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."); (Deuteronomy 16:19, "Do not deny justice or show partiality. Do not accept any bribes, for a bribe blinds the eyes of the wise and twists the words of the righteous."); (See, James 2:1, "do not show favoritism."); (James 2:9, "But if you show favoritism, you sin and are convicted by the law as transgressors."); (Proverbs 18:5, "Showing partiality to the wicked is not good, nor is depriving the innocent of justice."); (Proverbs 24:23, "These also are sayings of the wise: To show partiality in judgment is not good."); (Malachi 2:9, "So I in turn have made you despised and humiliated before all the people, because you have not kept My ways, but have shown partiality in matters of the law."); (Job 34:19, "who shows no partiality to princes and does not favor the rich over the poor, for they are all the work of his hands?"); (Job 13:10, "Surely He would rebuke you if you secretly showed partiality.").

50. I am also in particular danger of justice should the courts not hear my cases to overturn disciplinary determination on my licenses to practice law and vitiations of my fundamental rights due to fewer people reviewing US Supreme Court briefs.

51. In addition, due to my inability to work as an attorney based on a judicial determination of disability, I cannot work at my former law firm. So, I applied for food stamps. I will not receive food benefits should a shut down persists and face particularized danger. I risk losing a property interested protected under the 5th Amendment should a default arise lasting more than a month, but I care more about my liberty interests more. The shut down decreases the odds the US Supreme Court will grant petitions for writ of certiorari to safeguard my First Amendment rights to petition, religious belief, exercise of religious belief, speech and association without government incited persecution but for finding my religious beliefs repugnant.

52. This issue is capable of repetition yet evading review. Exceptional circumstances of peculiar emergency or public importance require all three federal branches be fully funded.

53. The usurpation of judicial power and a clear abuse of discretion exists by Defendants failure to exercise her discretion to coin money without debt and credit to fully fund one branch of government to preserve these United States from schemed overthrow.

54. The nation is in peril when the federal employees charged with upholding justice in the courts to safeguard individual liberties from being eliminated by majority rule through the vote. The judicial branch is at the mercy of the other two branches without the power to place a check on the other two branches.

55. Defendants thoughtfully, willfully abuse their discretion by not supporting the judicial branch while fully funding the members of the two other branches creating a clear and present danger by not upholding the three branches that make up the government.

56. Federal employees are compelled to work without pay due to two branches childish, dumb, conniving, self-serving antics to follow their lawless lusts untamed by the just rule of law. which may tempt the federal servants to be enslaved to the banks by taking out credit card debt or high interest loans which ultimately profit the members of the federal reserve in their private capacity as commercial bankers, but it endangers the entire nation by weakening once branch.

57. Upholding impartial injustice in the courts is a religious exercise of my belief. I am a Christian. Justice in the Courts is a command by God, a preempting command per Jesus.

56. I believe there will be a slow overthrow of the nation by the unlawful way money is currently coined by slavery debt plus interest and the worse way it is schemed.

57. Defendants unreasonably place national security at risk when the Courts, the Attorney Generals, the FBI, the CDC are left to work with out pay or without a full staff given there is a global war, China's surveillance base is spying on us from Cuba since 2019, there's a global pandemic, there is a global economic crisis, 80 trillion dollars of government pensions and other debt were written off by debt swaps per the BIS in 2022, and we face abnormal incessant contrived crisis. I desire the courts fully fund federal pensions, pay and social security under 31 U.S.C. § 5112 (k) too to preserve our national security by preserving the people who make up our government.

58. Exceptional circumstances of peculiar emergency or public importance requiring the courts act.

59. Slavery debt must be prevented to preserve the independence of the only impartial branch of the government, that prevents the other two branches from enslaving the country and the people to serve the partial desires of the government backed private and foreign partners under the deception of waiver of Constitutional liberties through the vote.

60. The Courts are the only branch that protects Constitutional liberties from being eliminated and sacrificed by the other two branches under the guise of representative authority in our Democratic Republic.

61. My religious objections to debt are genuine. I am a Christian.

62. Slavery by debt is against my religious beliefs. Federal workers will be required to work without pay, without a meeting of the minds or a choice. It is my religious exercise to seek justice in the courts to uphold the freedoms of government workers who are not below the law's protections, albeit they have more limited freedoms in order not to chill the rights of those they are paid to serve.

63. The following provision under U.S. Const. art. I, § 8 authorizes Congress to create money, arguably without debt or interest as the US Supreme Court previously upheld in *Knox v Lee*, 79 U.S. 457 (1871).

64. While the Constitution also unlawfully empowers Congress to enslave itself and its people making them less free and for sale slaves to private and foreign partners under a separate provision of U.S. Const. art. I, § 8 authorizing it with the power “to borrow money” to enslave the people to pay back their master creditor as ruler by taxes, which I argue violates the

13th Amendment and the premise of the Constitution to safeguard freedom and life as unconstitutional, this court merely must discern whether the delegated provision authorizing Yellen to coin at her discretion, not the discretion or request of the Federal reserve, without debt and interest is an abuse of discretion that jeopardizes the Courts and the federal government from dissolution and schemed overthrow or threat of security and the rule of law.

65. I have sincere religious objections to debt, especially debt created out of slavery by force, not a free meeting of minds under government compelled economic, physical or social government backed private and government backed foreign threats under the 2030 and 2050 plans under the far more heinous private plans to coin.

66. The government must do its own job and not delegate its authority or responsibilities to others. The government must coin to care for the people, not control and enslave the people to private and foreign powers or partners.

67. Elected officials are not above the law. When elected officials in the other two branches violate duties to uphold the life and liberty of those the Constitution requires they serve to instead oppress, and control by subjugated social, economic or physical force, we need the courts to find their conduct in violation of the Constitutional limits to make our people free with the limit the people may not enslave, harm or kill others. We must protect all people's individual freedoms from elimination under the collaborative, conditional, collective control of private and foreign partners and threats.

Wherefore I ask this case to enjoin Defendants from

68. Enjoin Defendants from not paying federal workers and from suspending the operations of the federal government on the ground Congress has not passed a budget by or

before September 30, 2023 on 1st, 5th, 13th and 14th Amendment grounds and further requests this Court sign a writ of mandamus to require Defendants to coin money without interest or debt under 31 U.S.C. § 5112 (k) to pay off the national debt in full or in the alternative to pay for federal employees and the operations of the federal government for all sums exceeding the budget shortfall and states as follows:

69. Since this issue is capable of repetition, yet evading review, I require an Order to enjoin Defendants from not paying federal workers and from suspending the operations of the federal government on the ground Congress has not passed a budget and further request this Court direct Defendants to coin money without interest or debt under 31 U.S.C. § 5112 (k) to pay off the national debt in full or in the alternative to pay for federal employees and the operations of the federal government for all sums exceeding a budget shortfall to prevent Congress and the President from fully funding their own salaries while threatening to leave an entire branch the judiciary unfunded.

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 92nd Affidavit

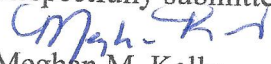
I, Meghan M. Kelly, Esquire, hereby certify on 9/30/23, I had a true and correct copy of the above referenced document, served to Defendants, through their counsel through email electronically:

Zi-Xiang Shen
Delaware Department of Justice
820 North French Street
6th Floor
Wilmington, DE 19801

Dated

9/30/23

Respectfully submitted,


Meghan M. Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com

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.

Dated:

9/30/23

Meghan Kelly (printed)

 (signed)



Food Benefit Renewal Letter

State of Delaware
Division of Social Services and Division of Medicaid & Medical Assistance

February 9, 2024

F

1 Fx

Your Case #:
3004754334

To: MEGHAN M KELLY
34012 SHAWNEE DR
DAGSBORO DE 19939-4125



Questions? Contact:
A. MAINTENANCE 811
POOL# 811
34314 PYLE CENTER RD
PYLE SSC UNIT 1
FRANKFORD DE 19945
(302) 732-1720
Fax: (302) 732-1721

En Español

Si usted no entiende este aviso o necesita que se lo traduzcan, favor de Llamar al Departamento de Relaciones con el cliente al 1-800-372-2022.

Bằng Tiếng Việt

Nếu quý vị không hiểu được thông báo này hoặc cần được phiên dịch, xin gọi cho Ban Liên Hệ Khách Hàng tại số 1-800-372-2022.

Notice of Expiration for Food Benefits - RENEWAL FORM DUE March 1, 2024

We are writing to tell you that your household will not get food benefits after **March 31, 2024** unless a member of your household:

- completes an application (or the enclosed renewal form)
- is interviewed and
- provides all necessary information

If you have recently sent in an application or completed one in the office within the past 30 days, please contact the office listed above to see if you need to complete this process again.

There are two ways you can renew your benefits.

1. Complete and sign the renewal form. Mail or fax the renewal form to the local office shown above by **March 1, 2024**.

-OR-

2. Submit your renewal application online through **My Account** at <https://assist.dhss.delaware.gov> by **March 1, 2024**. You will need this information:

- Case number
- Head of household's social security number or MCI number

RECEIVED

FEB 16 2024

DSS/PYLE

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939

Pyle State Service Center
Delaware Health and Social Services
34314 Pyle Center Rd,
Frankford, DE 19945
Via E-mail dhss_dss_pyleassist@delaware.gov
c/o Denise.johnson@delaware.gov
DHSS_DSS_Pyle_maintenance@delaware.gov
maryb@careerteam.com
teamdelaware@careerteam.com
pearesse@careerteam.com



RE: Food benefits **Case No 3004754334**/Petition this Office does not abuse its discretion by denying a religious accommodation or referring my case to the job training career's office/preventing the possibility of compelled religious violations/compelled involuntary forced servitude in violation of the 13th Amendment/due to other grounds outlined herein as well

February 16, 2024

Dear Sirs & Madams:

On or about February 15, 2024, I received notification dated February 9, 2024, that indicated inter alia work, training or volunteering requirements will resume for beneficiaries of food stamps.

The last two years I received an exemption from work requirements based on my petition which I incorporate herein by reference, even if not attached hereto, including all the voluminous emails therein I previously forwarded to you or your predecessors, or assigns.

I am not able to work or volunteer.

A number of courts are seeking to adjudicate me disabled, or have adjudicated me disabled. I am in the middle of law suits to prevent such adjudication in some courts and to overturn the orders in other courts. I may face the threat of additional law suits. I expect to be tied up in law suits for years until I can overturn the orders. I am fighting for my First Amendment private right to religious belief, religious exercise of belief, association, and private speech contained in my petitions, without the state's adjudication that my faith in Jesus Christ is a disability. Please see the attached order as an example of an adjudication of disability I seek to overturn.

I write to request this the State, this office, its agents and assigns grant me an **accommodation**.

I request you, your agents, or assigns **agree to refrain from referring my case** to Career Team, Business Interface or other entity administering work, volunteer, and training, requirements, for welfare benefits or for the State, when the work/training/volunteering requirements to receive benefits goes into effect.

Should my request for a **current agreement to refrain from referring my case to Career Team** be denied, I request **an exemption from work, volunteer and training requirements**.

I incorporate herein by reference, in its entirety all emails and assertions made therein, and the documents attached to the emails, I presented the last 2 years to this petition, but not attached now as voluminous, which must be considered in toto, in making a determination of this petition, including but not limited to the copies or the incorporation of the petition I presented last year.

I am a Christian. I believe in God through the father, son and holy spirit. The training program, volunteering and job requirements are against my religious belief. The government must not condition receipt of benefits in terms of welfare, food stamps, on my compelled violation of my asserted First Amendment right to religious beliefs, exercise of religious belief, and 13th Amendment right against involuntary servitude as there is no important justification, somehow more important than my free exercise of religion narrowly tailored to such justification. The state may easily create an accommodation for me.

It is against my religious belief to agree to pay for things I cannot afford. It is against my religious beliefs to go into debt, to essentially sell my soul by labor for things I cannot pay for. I gave my life to God, not money or man. ¹

My religious beliefs are so repugnant to the State, that the state seeks to prevent me from working at my former law firm, based on my religious speech, contained in the petitions to dissolve the establishment of government religion.

I am currently fighting to alleviate a substantial government burden upon my religious beliefs in the courts. I do not desire to fight another law suit with this agency. Instead, **I request you agree, at this time, to withhold a referral to the Career Team, when and if the work/volunteer/training conditions go into effect**, to prevent additional litigation.

The government through its agents is not required to adopt my religious beliefs in order to grant me an accommodation or an exemption. ² I merely request you respect and protect my free exercise of religion from government persecution or punishment by denial of benefits.

¹ (Romans 13:8 "Owe no man anything, but to love one another: for he that loveth another hath fulfilled the law."); I believe debt and interest on debt leads to damnation by the creditor and sin by the debtor by increasing desperate conditions to oppress people to seek money or material gain, instead of God's will to worship money as savior, in place of God. (Ezekiel 18:13 He lends at interest and takes a profit. Will such a man live? He will not! Because he has done all these detestable things, he is to be put to death [the second death in hell]; his blood will be on his own head.); (Matthew 6: 19-24 "19'Do not store up for yourselves treasures on earth, where moths and vermin destroy, and where thieves break in and steal. 20But store up for yourselves treasures in heaven, where moths and vermin do not destroy, and where thieves do not break in and steal. 21For where your treasure is, there your heart will be also. 22'The eye is the lamp of the body. If your eyes are healthy, c your whole body will be full of light. 23But if your eyes are unhealthy, d your whole body will be full of darkness. If then the light within you is darkness, how great is that darkness! 24'No one can serve two masters. Either you will hate the one and love the other, or you will be devoted to the one and despise the other. You cannot serve both God and money. (Galatians 1:10 "...do I seek to please men? for if I yet pleased men, I should not be the servant of Christ."); I believe organized charity, volunteering and fundraising is sin (See, Matthew 6:1-4, "'Be careful not to practice your righteousness in front of others to be seen by them. If you do, you will have no reward from your Father in heaven. 2'So when you give to the needy, do not announce it with trumpets, as the hypocrites do in the synagogues and on the streets, to be honored by others. Truly I tell you, they have received their reward in full. 3But when you give to the needy, do not let your left hand know what your right hand is doing, 4so that your giving may be in secret. Then your Father, who sees what is done in secret, will reward you.")

² While government forced involuntary servitude required for welfare violates everyone's 13th Amendment rights, I am not asking the State to adopt my religious beliefs. God requires secular welfare to care for those in need, and

Compelled servitude creates a substantial burden upon my religious beliefs, requiring I violate my beliefs in God, and involuntary servitude to sin and death in hell. US Amend I, XIII, XIV I request a waiver from work, training or volunteering requirements to prevent a government compelled violation of my religious beliefs in order to receive a benefit, in violation of the Equal Protections Clause applicable to the state, state's agents and assigns, pursuant to the First and Fourteenth Amendment applicable to the state, and the First and Fifth Amendment Equal protections component, applicable to the federal government, as a party of one, an indigent with religious beliefs against indebtedness.

The state and its agents have inherent equitable powers over their process to prevent abuse, oppression, and injustice by granting accommodations in the form of exemptions. *Gumbel v. Pitkin*, 124 U.S. 131 (1888); *Covell v. Heyman*, 111 U.S. 176 (1884); *Buck v. Colbath*, 70 U.S. 334 (1865); *Krippendorf v. Hyde*, 110 U.S. 276, 283 (1884).

On July 7, 2022, I spoke with the manager, Jamie Townsend at the Pyle Center who directed me to talk with representatives of Career Team, the entity allegedly charged with training, volunteering and jobs, instead of filing a petition with this office.

teaches welfare or grants to serve those who serve greed is sin. In the bible, I believe there is a secular law that requires crops to lay fallow on private land, to allow the poor, the lame, the widow and the foreigner to harvest the crops and live off of them the next six years to sell or eat. This form of secular welfare is required without indebting or enslaving the least of these to be exploited by businesses. God also teaches people go to hell for not forgiving debt, and everything once forgiven will be remembered by the sin hardness of heart for cold hearted or electronic cash. (Matthew 18 "21Then Peter came to Jesus and asked, 'Lord, how many times shall I forgive my brother or sister who sins against me? Up to seven times?' 22Jesus answered, 'I tell you, not seven times, but seventy-seven times. 23Therefore, the kingdom of heaven is like a king who wanted to settle accounts with his servants. 24As he began the settlement, a man who owed him ten thousand bags of gold was brought to him. 25Since he was not able to pay, the master ordered that he and his wife and his children and all that he had be sold to repay the debt. 26At this the servant fell on his knees before him. 'Be patient with me,' he begged, 'and I will pay back everything.' 27The servant's master took pity on him, canceled the debt and let him go. 28But when that servant went out, he found one of his fellow servants who owed him a hundred silver coins. He grabbed him and began to choke him. 'Pay back what you owe me!' he demanded. 29His fellow servant fell to his knees and begged him, 'Be patient with me, and I will pay it back.' 30But he refused. Instead, he went off and had the man thrown into prison until he could pay the debt. 31When the other servants saw what had happened, they were outraged and went and told their master everything that had happened. 32Then the master called the servant in. 'You wicked servant,' he said, 'I canceled all that debt of yours because you begged me to. 33Shouldn't you have had mercy on your fellow servant just as I had on you?' 34In anger his master handed him over to the jailers to be tortured, until he should pay back all he owed. 35This is how my heavenly Father will treat each of you unless you forgive your brother or sister from your heart.") By forgiveness, Jesus means money or material debts too. (Ezekiel 3:18-21 "18When I say to a wicked person, 'You will surely die,' and you do not warn them or speak out to dissuade them from their evil ways in order to save their life, that wicked person will die for their sin, and I will hold you accountable for their blood. 19But if you do warn the wicked person and they do not turn from their wickedness or from their evil ways, they will die for their sin; but you will have saved yourself. 20Again, when a righteous person turns from their righteousness and does evil, and I put a stumbling block before them, they will die. Since you did not warn them, they will die for their sin. The righteous things that person did will not be remembered, and I will hold you accountable for their blood. 21But if you do warn the righteous person not to sin and they do not sin, they will surely live because they took warning, and you will have saved yourself.")). I believe people go to hell for trusting in training, experts, professionals as God and guide instead of using their own brain by training, that dumbs down service and products by standardization, penalizing those who care to improve products or services by thinking outside of the standards. I believe people's minds are more valuable to invest in by their free choice, not force fed-dumbed down choice by those who desire to exploit their labor under the guise of caring for them. Jesus teaches call no one your teacher but God. Man misleads. People go to hell for not knowing, not caring to know, not caring to love by doing what their procedures, training or employer requires instead of what is right.

On July 7, 2022, I contacted the Career Team and spoke with a representative, Mary Barlow. She was caught by surprise since she indicated the other center refers people to their job center. I sent Mary Barlow documentation concerning my religious beliefs, I incorporate herein in their entirety.

On July 8, 2022, I called the Pyle center's number and spoke with an agent who directed me to send my petition to the Delaware Health and Social Services, through the Pyle State Service Center's office, instead of merely agents in the Career Team.

So, I am deferring to the instructions I received the last two years by sending my petition to all parties copied on the E-mail address above.

I have a First Amendment right applicable to the state pursuant to the Fourteenth Amendment and applicable to the Federal government pursuant to the Fifth Amendment to petition individuals in the Pyle State Service Center, the active case manager, and any additional case managers as they are assigned to my case, Jamie Townsend, Mary Barlow, Pearesse Seeney, Career Team, this agency, and the Delaware Health and Social Service Center concerning a substantial government compelled burden upon my religious exercise, to **prevent referring** my case to the Career Team or job placement center.

Such referral compels me to violate my religious beliefs, without a reasonable accommodation you may grant in order not to violate my religious beliefs. US Amend I, XIV.

I write to request this office through its agents and assigns or representatives use its required discretion to grant me an accommodation to prevent such referral requiring I be compelled to violate my religious beliefs, in exchange to receiving a government benefit, without justification somehow more important than my Constitutional liberty of free exercise of religion, free exercise of religious belief, and involuntary servitude in violation of the 13th Amendment, that is narrowly tailored to meet such more important interests. A religious accommodation, to me, will not impede any interest the government may claim. I do not request my accommodation be expanded to others facing hardship. I must be granted an accommodation, as a party of one.

This agency must not abuse its discretion, by compelling me to violate my religious belief by making such a referral. Thus, I request no referral be made.

It is against my religious beliefs to become indebted to servitude by volunteer or work debt exchange requirements.

I believe people go to hell for organized charity and volunteering.

I have sincere genuine religious beliefs against debt, all debts, I owe you, exchanging labor, volunteering or profiting private partners by undergoing training so they may be paid to exploit need to serve business freed under the guise of good. I believe business greed untamed by the pin of the holy spirit, love in our hearts or the just rule of law is sin leading to damnation in hell without repentance. Helping someone get a job is not charity per God. See Romans 4:4. Work must be by free choice not by government compelled choice in exchange for not only requirements but compelled violation of religious belief in violation of the 1st and 14th Amendment applicable to the state and to its agents and arms including private partners performing a government function,

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

6:24. I choose God. Earning money is not sin. When our desire to earn money takes the place of our desire to do God's will, by hardening our heads, hardening our hearts and hardening our hands preventing us loving God foremost and subordinately loving others as ourselves, I believe we sin.

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

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

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

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

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

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

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

own head.”); (*Deuteronomy* 23:19, “Do not charge your brother interest on money, food, or any other type of loan.”); (*Proverbs* 28:8, He who increases his wealth by interest and usury lays it up for one who is kind to the poor.); (*Exodus* 22:25, “If you lend money to one of my people among you who is needy, do not treat it like a business deal; charge no interest.”); (*Deuteronomy* 15:2 “This is the manner of remission: Every creditor shall cancel what he has loaned to his neighbor. He is not to collect anything from his neighbor or brother, because the LORD's time of release has been proclaimed.”)

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

I sincerely believe volunteering and organized charity is sin leading to damnation in the fires of hell. Jesus teaches in *Matthew* 6:1-4,

““Be careful not to practice your righteousness in front of others to be seen by them. If you do, you will have no reward from your Father in heaven. 2““So when you give to the needy, do not announce it with trumpets, as the hypocrites do in the synagogues and on the streets, to be honored by others. Truly I tell you, they have received their reward in full. 3But when you give to the needy, do not let your left hand know what your right hand is doing, 4so that your giving may be in secret. Then your Father, who sees what is done in secret, will reward you.”

When God says you will have no reward I believe that means no salvation from the second death in the fires of hell on judgement day. I believe Mother Theresa will not go to heaven. I believe many people go to hell for many different sins. That is what Jesus teaches in *Matthew* 7:13-15, *Luke* 13:23-28.

I assert my 1st and 14th Amendment right to keep myself holy and separate and not compromised for the wicked evil vanity of man who desires convenience, avoidance of costs, profit, power, or position at the cost of human sacrifice of life, health or liberty of others who they enslave to bend their will to their dictates as no longer free men but slaves to what I believe is the mark of the beast.

I filed a lawsuit against the democrats to petition to run for office without violating my religious beliefs by collecting signatures or donations, but withdrew it when the pandemic hit.

Trump established government religion by a course of conduct that created a substantial burden upon my religious exercise I filed a lawsuit against him to alleviate the substantial burden.

I filed a private Religious Freedom Restoration Act, 42 USCS § 2000bb (1-4) (“RFRA”) lawsuit *Kelly v Trump* in the Chancery, No. 2020-0809, Delaware Supreme Court, No. 119-2021, and the United States Supreme Court, No. 21-5522, as a private party to protect my private-First Amendment 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 Donald J. Trump and current President Joseph R. Biden from enforcing executive orders creating a union of government-religious entity partnerships, including enjoinder 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").³

These executive orders allow money or support to be transferred between government agents and religious organizations to perform government business. I believe the money or support in the bought or bartered for, not free union of church and state, is one reason why religious-political attacks seemed to have increased in recent years, including government incited religious-political attacks against me. 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, to perform government business under the guise of charity.

I believe Jesus teaches people commit lawlessness in the eyes of God for teaching business is charity, help, good or love. It violates God's command of loving one another by driving out unconditional love from the hearts of men replaced with the love of money and material gain, or productivity extracted from others. *Matthew* 6:1-4. It also makes mammon God and savior which causes people who seek to gain the world now to lose their eternal soul in hell. *Matthew* 16:26. I believe many of the churches mislead people to hell as they exploit need to serve greed by collections and fundraising from others under the lie of giving from self. This is the reflection of the image of the dead, those without eternal life should they not be born of spirit by living on bread alone like the world. *John* 3, *Matthew* 4:4, *Citing Deuteronomy* 8:3. Also see Acts and distinguish secular government from spiritual governance, and please note the Bible is not the Word of God. The father, son and holy spirit is the word, including the holy spirit contained in people, including people in the bible.⁴ Jesus teaches you cannot serve God and money. *Matthew* 6:24 Only those who do God's will are saved from death. *Matthew* 7:21-23. So, I believe those misled by the government-church business partnerships to exploiting the needy to serve the greedy will go to hell on judgment day should they not repent by committing deceptive lawlessness under the color of the law in an unfair, partial forced slave economy. I believe Jesus teaches people commit lawlessness ("sin") for giving charity seen or for giving to get like fundraising for elections, car washes or girl scout cookies leading to loss of eternal life in hell should they not repent. *Matt* 6:1-4.⁵ It is no small sin to mislead others to believing a lie as truth, to believe business is freedom when it makes rights for sale to those who unjustly barter favor in contravention of 8 U.S.C. § 201. The lie of the public good creates injustice by government partiality towards material gain at the cost of sacrificing a free people and their individual Constitutional rights under the deception of the common good, welfare or material

³ See 3DI-56 initial complaint and US Supreme Court brief in *Kelly v Trump* at Case No 21-5522 on docket

⁴ In *Matthew* 28:19 Jesus commanded, "Therefore go and make disciples of all nations, baptizing them in the name of the Father and of the Son and of the Holy Spirit." Jesus did not say the Bible. Even if Bibles cease to be or are distorted my God still is. See, *Exodus* 3:14 ""God said to Moses, "I AM WHO I AM. This is what you are to say to the Israelites: 'I AM has sent me to you.'"). God still is even if no Bibles or Torahs exist in paper form. The Word of God is written on the hearts of man to accept and reflect or to reject in perish in hell to be no more without eternal life. See, *Jeremiah* 31.

2 Corinthians 3:3 ("You show that you are a letter from Christ, the result of our ministry, written not with ink but with the Spirit of the living God, not on tablets of stone but on tablets of human hearts.")

⁵ 3DI-56, Affidavit 107 with focus on arguments against fundraising in the exhibits thereto, where I sought an exemption from signatures and see requirements in order not to violate my religious belief to run for office.

gain. Jesus teaches those who worship by business are not welcome in his father's house. *John* 2:16.

"The Establishment Clause prohibits government from establishing a religion in the sense of *sponsorship, financial support*, or active involvement of the sovereign in religious activity." *Kalman v. Cortes*, 723 F. Supp. 2d 766, 769, (2010)

I reasonably believed the Executive Orders violated the establishment clause, especially Trump's E.O. 13798 which permits churches to back candidates and parties using the donations from parishioners to serve the political vanity of men which I believe is blasphemy by making man God's anointed instead of Jesus. I believe the executive orders also violates Jesus's teachings in *Matthew* 6:1-4, and 6:24 misleading people to hell under the guise of salvation, which caused me foreseeable emotional distress. I love people. It is a religious exercise of my belief to love others. I do not want them to be misled to harm or hell. *See Bible Isaiah* 9:16 ("For the leaders of this people cause them to err; and they that are led of them are destroyed [in the fires of hell on judgment day as too corrupt to live into eternity in heaven]").

President Trump also incited religious-political persecution against me as a party of one and other people for their projected religious beliefs based on not supporting him in his formal government position, or his Republican party, or the religious organizations which supported his presidential candidacy, including me as a party of one, (as a Christian, Catholic, Democrat who exhibited opposition to Trump by drafting 5 proposed articles of impeachment which I contacted all 541 federal law makers to impeach on), substantially burdening my free exercise of religious belief, **by a course of conduct which I argue also establishes government-religion**, causing people to attack me, **talk about shooting me**, throw things at my vehicle, actually shooting two bullets in the home of Delawarean Greg Layton based on political beliefs, kill, harm or attack others based on religious or political belief substantially burdening my free exercise of religion, speech, and political-religious affiliation, as I outlined in *Kelly v Trump* to this Supreme Court at pages 23-25, including but not limited to:⁶

- "1. appointing a personal spiritual advisor, and alleged Christian leaders to advise the President, creating the religious backing and the appearance of Godly guidance supporting Defendant's government authority;
2. holding up a Bible in front of a church for a photo op after people were gassed in response to their Constitutional exercise of affiliation and speech at a protest;
3. hypocritically claiming "Biden will hurt the Bible;
4. persecuting people who exercised their freedom to worship or not by the dictates of their own conscience, not government-religious commands, by demeaning those who omitted the word God in the pledge of the allegiance;
5. improperly sharing his alleged prayer to God, while acting under the color of the law;
6. creating the illusion there is a war on Christmas, by liberals like me;
7. repeating the government-religious belief that he may be the chosen one by God, contributing to the government-religious belief Trump is anointed by God;
8. moving the US embassy in Israel to Jerusalem for a religious group, Evangelicals;
9. sponsoring and inciting private persecution towards liberals by churches and its parishioners, by buying loyalty by barter or exchange, even by praise, for a little something down the line, such as bailouts, or power to persuade politicians, at the cost of teaching some preachers and parishioners to persecute non-Trump supporting liberals like me, and including me;

10. tweeting fabrications making it appear democrats like me are attacking the church including the tweet. 'DEMS WANT TO SHUT YOUR CHURCHES DOWN, PERMANTLY. HOPE YOU SEE WHAT IS HAPPENING. VOTE NOW;'

11. signing another Executive Order, Ex. Or No. 13831, May 3, 2018, which increases the temptation for government employees, including the President, to back religions financially or otherwise, in hopes to receive their government backing and government support in return under E.O. 13798; and

12. using his son to glorify him as the savior of Christianity, when I believe Jesus the Christ is the savior under Christianity. Eric Trump said his "father 'literally saved Christianity...there is a full war on faith on the other side, (meaning my democrat side). (Eric continued), 'The Democrat Party, the far left, has become the party of atheists, and they want to attack Christianity'"

I obviously believe I was right to sue Trump.

The State of Delaware sued me to label me disabled but for my religious beliefs, speech, contained in my petitions in my petitions against Trump in *Kelly v Trump*.

The Delaware Disability Order and reciprocal disability orders prevent me from returning to work, and from getting a job should I not remove the disability orders in court.

Per *Thomas v. Review Board*, 450 U.S. 707, 714 (1981), even if the State or its agents finds my faith in Jesus illogical "religious beliefs need not be acceptable, logical, consistent, or comprehensible to others in order to merit First Amendment protection.").

"To be sure, a state may not condition the grant of a privilege, [a license,] or benefit upon the surrender of a constitutional right." Citing, *Western Southern Life Insurance Co. v. State Board of Equalization*, 451 U.S. 648, 657-58, 664-65 (1981)

State held my religious beliefs contained in my petitions in *Kelly v Trump* is the reason for declaring me mentally unfit to work in the profession of my choice. See, *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 682. ("Courts have no business addressing whether sincerely held religious beliefs asserted in a RFRA case are reasonable."); (See e.g. 3DI 24-11-3DI 24-12, regarding religious belief and citations to bible as source of DE disability)

The State labels my religious belief contained in my speech in my petitions to be a disability. *The United States Supreme Court held in Trinity Lutheran Church of Columbia, Inc. v. Comer*, 137 S. Ct. 2012, 2019 (2017); "The Free Exercise Clause "protect[s] religious observers against unequal treatment" and subjects to the strictest scrutiny laws that target the religious for 'special disabilities' based on their "religious status." Citing *Church of Lukumi Babalu Aye, Inc. v. Hialeah*, 508 U.S. 520, 533, (1993); ("In *McDaniel v. Paty*, 435 U.S. 618 (1978), 'for example, we invalidated a state law that disqualified members of the clergy from holding certain public offices, because it "impose[d] special disabilities on the basis of . . . religious status."')

The State Court applies disability determinations in an unconstitutional manner while treating other attorneys who exercised the same rights for which I am punished more favorably without state prosecution based on disability so long as they align with the government's belief in money and material gain. (US Amend XIV Equal Protections)

I have been selectively targeted based on subject matter of speech contained in my petitions, without a compelling state interest more important than the protection of my Constitutional rights, which if left unprotected makes other professionals no longer free under the threat of government retaliation.

The object of the application of the state's adjudications of disability is to "infringe upon or restrict [my] practices because of their religious motivation, the law is not neutral," as violating the Equal Protections clause as applied to me a party of one. *Lukumi Babalu Aye, Inc. v. City of Hialeah*, 508 U.S. 520, 533-534 (1993), US Amend I, XIV.

The United States Supreme Court held in *Church of the Lukumi Babalu Aye, Inc. v. City of Hialeah*, 508 U.S. 520, 543, 546, 561 (1993),

"The principle that government, in pursuit of legitimate interests, cannot in a [selective manner impose burdens only on conduct motivated by religious belief] is essential to the protection of the rights guaranteed by the Free Exercise Clause. ...A law [as applied to me as a party of one] burdening religious practice that is not neutral or not of general application must undergo the most rigorous of scrutiny. To satisfy the commands of the First Amendment, a law restrictive of religious practice must advance "'interests of the highest order,'" and must be narrowly tailored in pursuit of those interests....**A law that is religion neutral on its face or in its purpose may lack neutrality in its effect by forbidding something that religion requires or requiring something that religion forbids.**"

"The doctrine that a government, state or federal, may not grant a benefit or privilege, [including snap benefits or food stamps] on conditions requiring the recipient to relinquish his constitutional rights is now well established." *Citing, Jones v. Board of Education*, 397 U.S. 31, 34 (1970); (internal quotes omitted) Nor may the government "prohibit any kind of expression because it does not like what is being said." *Id.* at 35-36.

US Supreme Court held in *Illinois Elections Bd. v. Socialist Workers Party*, 440 U.S. 173, 185 (1979) held, "even when pursuing a legitimate interest, a State may not choose means that unnecessarily restrict constitutionally protected liberty," *Kusper v. Pontikes*, 414 U.S. 51, 58-59 (1973), and we have required that States adopt the least drastic means to achieve their ends. *Lubin v. Panish, supra*, at 716; *Williams v. Rhodes, supra*, at 31-33."

The State labels my religious belief contained in my speech in my petitions to be a disability. The United States Supreme Court held in *Trinity Lutheran Church of Columbia, Inc. v. Comer*, 137 S. Ct. 2012, 2019 (2017); "The Free Exercise Clause "protect[s] religious observers against **unequal treatment**" and subjects to the strictest scrutiny laws that **target the religious** for '**special disabilities**' based on their "**religious status**." *Citing Church of Lukumi Babalu Aye, Inc. v. Hialeah*, 508 U.S. 520, 533, (1993); ("In *McDaniel v. Paty*, 435 U.S. 618 (1978), "for example, we invalidated a state law that disqualified members of the clergy from holding certain public offices, because it "impose[d] **special disabilities** on the basis of . . . **religious status**."

The doctrine forbidding unbridled discretion was violated. The decision makers rely upon no more than their purely subjective ideas of public welfare, peace, safety, health, decency, good order, morals or ethics. See *Shuttlesworth v. City of Birmingham*, 394 U.S. 147 (1969).

The US Supreme Court held in *Gentile v. State Bar of Nevada*, 501 U.S. 1030, 1054 (1991)

"At the very least, our cases recognize that... rules governing the legal profession cannot punish activity protected by the First Amendment, and that First Amendment protection survives even when the attorney violates a... rule he swore to obey when admitted to the practice of law.....We have not in recent years accepted our colleagues' apparent theory that the practice of

law brings with it comprehensive restrictions, or that we will defer to professional bodies when those restrictions impinge upon First Amendment freedoms.”

I am still seeking relief in court, without an income based on the state finding me disabled. I am left impoverished. While I believe people go to hell for creating debt others must pay for profit or to pay salaries, it is different with regards to my parents. Every material thing I have used is not my own, but is my parents. What they provided for me is not for profit or to serve business greed. If I am unable to pay back the debt, my parents would forgive me my debts because they are Christian. I believe people go to hell for not forgiving monetary debts. I believe God teaches people go to hell for creating debt, and charging interest on debt or gaining unjust gains by exploiting people based on debt.

I also have severe allergies, and I assert my right to life and health. I ask for a medical excuse as well as for the other reasons outlined above and attached hereto. I received bad care in my youth as a teenager and require rest, exercise and gallons not cups of water to preserve my life and health. I assert my right to live. I am required to have rest, exercise and gallons not cups of water each month in order not to collapse or potentially due to severe dehydration relating to the bad healthcare I sustained as a teenager.

I have religious objections to evaluations and medical treatment by doctors. So, I request a religious exemption from requiring I violate my religious belief in order to qualify for an exemption from the requirement of a doctors’ opinion, to prevent the government’s violation of my First, Fourteenth and Fifth Amendment rights, as a party of one.

I am anti-science and I believe people risk damnation in the fires of hell for objectifying people as subjects in experiments. I believe people sin for experimenting on people despite their consent and despite the fact they are doing what they are trained to do or their employer requires. Since I think using people as lab rats and organized charity is a damnable sin without repentance I hate “race for cures” or St. Jude because they exploit need to serve greed by sustaining problems to sustain positions, power and profit streams. This is not real charity per Jesus Christ’s commands. I believe humility saves the proud, and correction with mercy in court prevents the default damnation in hell.

I believe God will destroy people in hell who ignorantly or indifferently harm people’s bodies at their job should they not repent. See, 1 Corinthians 3:16-17 (“Do you not know that you yourselves are God’s temple, and that God’s Spirit dwells in you? If anyone destroys God’s temple, God will destroy him; for God’s temple is holy, and you are that temple”) Not knowing is guilt, not caring to know in order to love. *Hosea* 4:6. (“My people are destroyed [without eternal life] for their lack of knowledge”) Yet turning away from evil lusts for money to care for your own at the cost of human sacrifice of life, liberty or health of those outside your own may save people from certain damnation in hell.

I object to even allowing my biological health records to be used for research.

I have religious objections to health evaluations and assessments. I believe people sin for teaching people to blindly rely on professional evaluations and opinions as guide, because it makes imperfect man God. I believe it is blasphemy misleading others to harm and damnation in hell by idolatry. See, Romans 1:25, and 1:32 the Bible provides (“They exchanged the truth about God for a lie, and worshiped and served created things rather than the Creator—who is forever praised. Amen.... they know God’s righteous decree that those who do such things deserve death [in the lake of fire, the Second death], they not only continue to do these very things but also approve of those who practice them.”)

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 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 their damnation in hell for not seeking to know, and for failure to repent of hardness of hearts for cold hard cash.

Lawsuits and 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.

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 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.

I observe the same wrongs continued. Pharmaceutical entities who have paid out money in law suits are still 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 recent 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.

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 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.

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. 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, 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.

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. See, <https://www.bbc.co.uk/bbcthree/article/347828f8-6e7f-4a9b-92ab-95f637a9dc2e>

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. Amos 4:1. 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 Christian government leaders 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. 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.

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.

I believe professionals are dumbed down by standardized training, stifling the freedom of independent critical thinking and disagreements which helps people learn from one another. In the Courts the judges often do not choose to think things out. They defer to experts, professionals and the uniform standards they hold, which makes their potentially harmful standards above court correction. Attorneys can't prevent the cancer causing products, pollution or other harmful practices when judges defer to the experts. Nor can attorneys' aide in improving products and services when the government or the government's private partners reward the people who cause or back harmful standards by allowing grants to be given to people within different entities who profit off of the cure. Those same people have incentive to cause the problem or encouraged harm. So they may continue to sustain their position, power or profit. I do not believe money is ever the solution. It rewards misbehavior.

I believe doctors sin for gathering data for the NIH and private partners by making people and their information for sale instead of a free people. I believe the collection of data serves lawless lusts making make men their own gods under the deception of caring for others. I believe it teaches man to reflect the image of the devil under the guise of good by seeking to be all knowing like God, making man and man's work, science or technology God. See, *Isaiah* 14. In the Bible it teaches "cursed are those who place their faith in man." I do not seek to mislead others to harm or even hell by conforming to the world's trust in professionals as demi-gods in the worship of money. Jesus teaches you cannot serve money and God. *Matthew* 6:24. I believe people sin for looking at others for what others may contribute for help, volunteering, money and material gain to give to others in need. It is my religious belief such activity is the exploitation of others to serve business greed, and blinds people' eyes from seeing clearly to love others. In John Jesus teaches people to sell what they have when giving to charity, not to take what others have by government compelled volunteering or otherwise, and claim to be helping others. It is

the evil eye I believe leading to hell by enslaving others under the guise of caring for them. I argue business greed by organized charity or business is the mark of lawlessness leading to hell if left unrestrained. man or man's science, studies, work, technology,

I believe people go to hell, even little children for fundraising, selling girl scout cookies, asking for marketing help by business contributions and organized charity. Jesus teaches us people go to hell when they behave as hypocrites giving or volunteering to be seen o, to gain a benefit like food stamps, marketing, tax breaks, connections, out of enjoyment or other gain. Matthew 6:1-4. I believe this damns people to hell by worship of the mark of the beast, the belief giving to get is charity or unconditional love, driving out God from their hearts with the love of money leading to damnation in hell. I believe people go to hell for teaching people to have pride in their work. Pride is sin. Boasting in God not our own works is better. I believe people go to hell for telling others they must earn a living. Money and material gain by barter or exchange does not give life. I believe God gives life. I believe people go to hell for accepting government grants and contracts because it creates a fixed, unequal not free or fair economy. I believe most people are enslaved to sin and death in hell. I keep myself separate, and try to shed light on the darkness in hopes people are not misled to harm or hell. I do not want people to go to hell, and it is against my religious belief to be compelled to mislead them there by participation in the work or volunteer requirements.

I do not believe the same as others. I believe people go to hell for teaching people to chase happiness, the desires of others, or their hearts desires to be enslaved by those who entice their desires not free in Jesus Christ from death in hell, by laying down their desires to discern what is right love verses lusts to do what is pleasing to God not man.

I attach documents and a health record and assert my right to live and not die to serve the evil vanity of men too. I do have physical limitations and have severe dehydration where I must rest and drink gallons not cups of water in order not to faint, harm my health or die despite others not wanting to be inconvenienced. I also believe people go to hell for killing myself and oppose the death with dignity acts because I do not want people to harm themselves die and go to hell like King Saul and Judas will on judgment day per the Bible.

I also believe babies and we all are born enslaved to sin and death in hell in need of a savior be being born again. See John 3, See, *Psalms* 51:5 ("Surely I was sinful at birth"); *Ephesians* 2:1-4 ("And you 1were dead in your trespasses and sins, in which you formerly walked according to the 1course of this world, according to the prince of the power of the air, of the spirit that is now working in the sons of disobedience. Among them we too all formerly lived in the lusts of our flesh, 1indulging the desires of the flesh and of the mind, and were by nature children of wrath, even as the rest. But God, being rich in mercy, because of His great love with which He loved us, even when we were dead [spiritually dead not saved from hell, the second death at birth]1in our transgressions, made us alive together with Chris").

So, I oppose abortion because it not only takes a life. Abortion kills and prevents the possibility a baby will have eternal life.

I love other people and try not to encourage sins that harm them or others.

Wherefore the State of Delaware, the Pyle State Service Center, Delaware Health and Social Services, Mrs. Maul, Jamie Townsend, Team Delaware, Business Interface, Pearesse Seeney, Mary Barlow, agents and assigns must grant my request(s).

Dated February 16, 2024

Respectfully submitted,

/s/Meghan Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939



IN THE CHANCERY COURT OF THE STATE OF DELAWARE

Meghan Kelly

Civil Action No.: 2020-0157-SG

Plaintiff,

v.

The Democratic Chair, Erik
Raser-Schramm, a.k.a. Erik Schramm)
Individually, and in his capacity as)
The Chairman of the Democratic)
Party for the State of Delaware,)
Anthony Albence, individually, and)
in his capacity as The Election)
Commissioner of the State of)
Delaware Department of Elections,)
Kathleen Jennings, individually, and)
in her capacity as Attorney General of)
the State of Delaware, the Delaware)
Department of Elections, Sussex)
County Department of Elections, Kent)
County Department of Elections, New)
Castle County Department of)
Elections, and The Democratic Party)
of the State of Delaware, a.k.a.)
The Delaware State Committee, a.k.a.)
The State Executive Committee, a.k.a.)
The Democratic Party State Executive)
Committee, a.k.a. The Executive)
Committee of The Democratic party)
Defendants.)

H IEP

REGISTER IN CHANCERY
GEORGETOWN DELAWARE
170 MAR 20 PM 2:23

MOTION TO VACATE MOTION TO WITHDRAW CAUSE OF ACTION

COMES NOW, Meghan Kelly, Pro Se Plaintiff, who respectfully moves this

Honorable Court to vacate and withdraw this cause of action.

Due to the unforeseen National Emergency relating to COVID19, I believe it is in the best interest of all parties and this Honorable Court for me to vacate my cause of action. I foresee the Post Office may close, due to alleged employees infected with the COVID19 Virus. Thus, I may endanger my colleagues by sending pleadings via US Mail if this case continues.

I foresee this Honorable Court may also close.

I do not desire to endanger this Honorable Court or the other parties during this national state of emergency. In an abundance of caution, and with utmost seriousness concerning my desire to protect life and health foremost, I respectfully request that my case be vacated and withdrawn.

I thank the Honorable Court and all parties for their kind consideration of this important matter.

MEGHAN KELLY

/s/Meghan Kelly
Meghan Kelly, Esquire
Pro Se
34012 Shawnee Drive
Dagsboro, DE 19939
(772)332-9719
(Word Count 1,718)

Dated: March 20, 2020

IN THE CHANCERY COURT OF THE STATE OF DELAWARE

Meghan Kelly	)	
	)	Civil Action No.: 2020-0157-SG
	)	
Plaintiff,	)	
v.	)	
The Democratic Chair, Erik	)	
Raser-Schramm, a.k.a. Erik Schramm	)	
Individually, and in his capacity as	)	
The Chairman of the Democratic	)	
Party for the State of Delaware,	)	
Anthony Albence, individually, and	)	
in his capacity as The Election	)	
Commissioner of the State of	)	
Delaware Department of Elections,	)	
Kathleen Jennings, individually, and	)	
in her capacity as Attorney General of	)	
the State of Delaware, the Delaware	)	
Department of Elections, Sussex	)	
County Department of Elections, Kent	)	
County Department of Elections, New	)	
Castle County Department of	)	
Elections, and The Democratic Party	)	
of the State of Delaware, a.k.a.	)	
The Delaware State Committee, a.k.a.	)	
The State Executive Committee, a.k.a.)	)	
The Democratic Party State Executive)	)	
Committee, a.k.a. The Executive	)	
Committee of The Democratic party	)	
Defendants.	)	

NOTICE OF SERVICE

PLEASE TAKE NOTICE that the undersigned pursuant to Chancery Court Rule 5, Meghan Kelly hereby certifies that the Motion to Vacate and Motion

Withdraw this cause of action was served together with this Notice of Service on the March 20, 2020 as follows to:

VIA U.S. MAIL

Anthony Albence,
905 S. Governors Ave., Suite 170
Dover DE 19904.

VIA U.S. MAIL

Delaware Department of Elections
905 S. Governors Ave., Suite 170
Dover DE 19904.

VIA U.S. MAIL

Kent County Department of Elections
905 S. Governors Ave., Suite 170
Dover DE 19904.

VIA U.S. MAIL

Defendant Kathleen Jennings, the Attorney General for the State of Delaware,
Building 820 N. French St.,
Wilmington, DE 19801.

VIA U.S. MAIL

Defendant New Castle County Department of Elections
820 N French St Ste 400,
Wilmington, DE 19801.

VIA U.S. MAIL

Sussex County Department of Elections
119 N Race St,
Georgetown, DE 19947.

VIA U.S. MAIL

Defendant Erik Raser-Schramm,
The Democratic Party of the State of Delaware,
9 E. Commons Blvd., Suite 2,

New Castle, DE 19720.

VIA U.S. MAIL

Defendant The Democratic Party of the State of Delaware,
9 E. Commons Blvd., Suite 2,
New Castle, DE 19720.

MEGHAN KELLY

/s/Meghan Kelly
Meghan Kelly, Esquire
Pro Se
34012 Shawnee Drive
Dagsboro, DE 19939
(772)332-9719

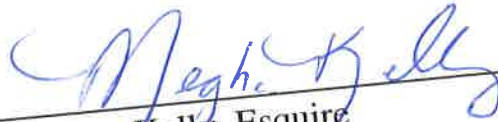
Dated: March 20, 2020

AFFIDAVIT OF MAILING

STATE OF DELAWARE:
: SS.
SUSSEX COUNTY :

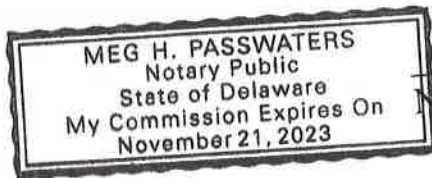
BE IT REMEMBERED, that Meghan Kelly, Esquire being duly sworn according to law, deposes and says she caused to be sent to the following:

One copy of the Motion to vacate and Withdraw this Cause of Action by placing the same in the mail, with the proper postage at a US Post Office in Sussex County, Delaware.



Meghan Kelly, Esquire

March, 2020. SWORN TO AND SUBSCRIBED before me this 20th day of





Notary Public

Expiration

EFiled: Mar 03 2020 10:00AM EST

Transaction ID 64781595

Case No. 2020-0157-



IN THE CHANCERY COURT OF THE STATE OF DELAWARE, SUSSEX COUNTY

Meghan Kelly

Plaintiff,

v.

The Democratic Chair, Erik
Raser-Schramm, a.k.a. Erik Schramm
Individually, and in his capacity as
The Chairman of the Democratic
Party for the State of Delaware,
Anthony Albence, individually, and
in his capacity as The Election
Commissioner of the State of
Delaware Department of Elections,
Kathleen Jennings, individually, and
in her capacity as Attorney General of
the State of Delaware, the Delaware
Department of Elections, Sussex
County Department of Elections, Kent
County Department of Elections, New
Castle County Department of
Elections, and The Democratic Party
of the State of Delaware, a.k.a.
The Delaware State Committee, a.k.a.)
The State Executive Committee, a.k.a.)
The Democratic Party State Executive
Committee, a.k.a. The Executive
Committee of The Democratic party
Defendants.

Civil Action No.:

**PLAINTIFF'S CASE FOR CHRIST,
PLAINTIFF'S COMPLAINT AGAINST DEFENDANTS FOR THEIR
VIOLATION OF THE EQUAL PROTECTIONS CLAUSE, IN THIS
CLASS OF ONE, UNDER THE 1ST AMENDMENT APPLICABLE
TO THE DEFENDANTS VIA THE 14TH AMENDMENT, FOR
DEFENDANTS UNLAWFUL APPLICATION OF 15 DEL.C. § 3103,
CONDITIONING PLAINTIFF'S RIGHT TO RUN TO OFFICE,**

**ON THE EMILINATION OF OTHER
FUNDAMENTAL RIGHTS, AS APPLIED TO PLAINTIFF**

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

THE PARTIES

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

2. Defendant Erik Raser-Schramm, in his individual capacity, and in his official capacity as Chairman of the Democratic Party a.k.a. Democratic Chair ("Party Chair" and collectively, "Defendants") is a Delaware resident. The Party Chair may be served at the Democratic headquarters, a.k.a. his place of business, at, The Democratic Party of the State of Delaware, 9 E. Commons Blvd., Suite 2, New Castle, DE 19720. He may be served at C/O, The Democratic Party of the State of Delaware, 9 E. Commons Blvd., Suite 2, New Castle, DE 19720.

3. Defendant Election Commissioner of the State, Anthony Albence, (Individually "Commissioner" and collectively, "Defendants"), in

his personal capacity and in his capacity as Election Commissioner, is a resident of the state of Delaware, whose place of business is at 905 S. Governors Ave Suite 170 Dover DE 19904. He may be served at 905 S. Governors Ave Suite 170, Dover DE 19904.

4. Defendant Kathleen Jennings, (Individually “AG,” and collectively “Defendants”), in her personal capacity and in her capacity as the Attorney General for the State of Delaware, whose place of business is located at Carvel State Building 820 N. French St., Wilmington, DE 19801. She may be served at Building 820 N. French St., Wilmington, DE 19801.

5. Defendant Delaware Department of Elections (Collectively, “Defendants”), has an address of 905 S. Governors Ave Suite 170 Dover DE 19904.

6. Defendant Sussex County Department of Elections (Collectively, the “Defendants”), has an address of 119 N Race St, Georgetown, DE 19947.

7. Defendant Kent County Department of Elections (Collectively, “the Defendants”), has an address of 905 S. Governors Ave Suite 170 Dover DE 19904.

8. Defendant New Castle County Department of Elections (Collectively, the Defendants"), has an address of 820 N French St Ste 400, Wilmington, DE 19801.

9. Defendant Democratic Party of the State of Delaware, a.k.a. the Delaware State Committee, a.k.a. the State Executive Committee, a.k.a. the Democratic Party State Executive, Committee, a.k.a. the Executive Committee of the Democratic Party, (the "Party" and the "Committee" and collectively, the "Defendants"), The Delaware Democratic Party located at 9 E. Commons Blvd., Suite 2, New Castle, DE 19720.

JURISDICTION

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

11. This Honorable Court has personal jurisdiction over Defendants because Defendants are Delaware residents.

12. Defendants regularly conduct government business in this state and claims against Defendants arise from Defendants' government business transactions in the state of Delaware.

FACTS

I. PROCEDURAL AND LEGAL FACTS

13. This case arises upon the Defendants' unconstitutional condition

precedent requiring Meghan Kelly to violate her religious beliefs, her belief in Jesus Christ's teachings, by conforming with the filing fee and or signature requirements pursuant to *15 Del.C. § 3103 (a)(1)(c),(d)*, in order to be placed on the ballot as a democratic candidate for the U.S. House of representative seat in the state of Delaware for the upcoming election, in violation of Meghan Kelly's first Amendment Rights, applicable to the Defendants pursuant to the Fourteenth Amendment under the Equal Protections Clause of the Constitution, in this class of one, as applied to Meghan, including her right(s) of free exercise of religion, speech, association, and right to run for office without disobeying Jesus, thereby compromising her faith and in doing so, essentially selling her soul to Satan to gain the world. (See Exhibit 1, *15 Del. C. § 3103*)

14. The Constitution preempts conflicting state and local laws and regulations.

15. The Defendants must overcome strict scrutiny to defeat Meghan Kelly's claims, in this class of one, under the Equal Protections Clause Applicable to Defendants under the Fourteenth Amendment.

16. The Equal Protections applies where a law treats a person or class of persons differently from others. An Equal Protections claim, may be brought with as few members as one. (See, *Village of Willowbrook v. Grace*, 528 US 562 (2000)).

17. Where a law limits fundamental rights, strict scrutiny will be applied, and the law, or other government action, will be upheld only if it is

necessary to promote a compelling or overriding interest.

18. All fundamental rights including the rights I seek to uphold here, including but not necessarily limited to, the right to run for office related to the right to vote, according to the dictates of my own conscience, not the dictates of the government, or agents acting with under the cloak of government authority or power, and the freedom to worship or not according to the dictates of my own conscience, not the dictates of the government or agents acting with under the cloak of government authority or power, the freedom to speak or not to speak according to the dictates of my own conscience, not the dictates of the government or agents acting with under the cloak of government authority or power, and the freedom to associate or not, according to the dictates of my own conscience, not the dictates of the government or agents acting with under the cloak of government authority or power are at issue.

19. The Party's and the Party Chair's conduct is so entangled with the government's function, to be considered government conduct.

20. The Party and Party Chair must be considered as agents of the government, acting with under the cloak of government authority or power.

21. With the cloak of government power, the Constitution, and our laws derived from the Constitution, limit the freedoms of those in government, or acting under the cloak of government authority, such as the Party and the Party Chair, in order not to chill the freedoms of those they serve. The Constitution in this manner makes the common man more

powerful than those in positions of government authority.

22. So, I understand, once I am in office I will have fewer freedoms to speak about my belief in Jesus Christ than I do now in order not to chill the freedoms of those I hope to serve. I am just not willing to disobey Jesus to gain an election seat.

23. The Party Chair has the power to waive fees. (See, *Bartley v. Davis*, No. CIV.A. 8561, 1986 WL 8810, at *1–2 (Del. Ch. Aug. 14, 1986), *aff'd*, 519 A.2d 662 (Del. 1986), (The Honorable Chancery Court noted, “This [filing fee] requirement has long been a method to effectuate the above purposes and past political practice, according to the Chairmen of the Delaware Democratic and Republican Parties, has permitted this requirement to be waived.”). (See, Exhibit 2).

24. The Honorable Delaware Supreme Court, on appeal, noted that the party Chair only has statutory authority to waive such fees prior to the filing deadline. (“Attempted filing fee waiver of democratic state chairman, acting for democratic state committee after notification date, was invalid. 15 Del.C. §§ 3103(c), 3106.” *Bartley v. Davis*, No. CIV.A. 8561, 1986 WL 8810, at *5 (Del. Ch. Aug. 14, 1986), *aff'd*, 519 A.2d 662 (Del. 1986), Citing, *Bartley v. Davis*, 519 A.2d 662 (Del. 1986)”). (See, Exhibit 3).

25. The Party Chair and the Party has chosen not to exercise their authority to grant such waiver as mandated under the Constitution, in utter disregard to Meghan Kelly's religious waiver request, thereby essentially persecuting her based on her faith in Jesus Christ.

26. Similarly, the other Defendants, including but not limited to the Commissioner and the Delaware Department of Elections also refuse to comply with the Constitution by waiving the filing fee and signature requirements by entering her filing form as complete, thereby essentially persecuting Meghan Kelly based on her free exercise of religion.

27. The Honorable Third Circuit Court, in *Belitskus v. Pizzigrilli*, 343 F.3d 632 (3d Cir. 2003) held, “State’s power to regulate elections must be exercised in a manner consistent with the Equal Protection Clause of the Fourteenth Amendment. *U.S.C.A. Const. Art. 1, § 4, cl. 1; U.S.C.A. Const. Amend. 14.*”). (See, Exhibit 4).

28. “When First and Fourteenth Amendment rights are subjected to severe restrictions under state election regulation, the regulation must be narrowly drawn to advance a state interest of compelling importance; however, when a state election law provision imposes only reasonable, nondiscriminatory restrictions upon the First and Fourteenth Amendment rights of voters, the State’s important regulatory interests are generally sufficient to justify the restrictions. *U.S.C.A. Const. Amends. 1, 14*”); *Id* (Indigent candidates’ “as applied” equal protection challenge to Pennsylvania’s mandatory filing fee requirements was not moot under “capable of repetition, yet evading review” exception to mootness doctrine, although election in which they ran had been held; challenge was too short in duration to be fully litigated prior to its expiration, and given lack of evidence to the contrary, it was reasonable to assume that the candidates

would once again seek waiver of mandatory fees due to indigency. U.S.C.A. Const. Amend. 14; 25 P.S. § 2873(b.1).” This case is distinguished since the sole issue is based on Meghan Kelly's free exercise of her religious beliefs, which also affects her free exercise of speech, association and rights associated with her candidacy for office in this case. Yet, this Court's analysis of the "capable of repetition, yet evading review" doctrine applies to the case at hand). *Id.*

29. On or about October 28, 2019, Meghan Kelly sent the State Chair, a representative of the Democratic party, Jesse Chaderon ("Jesse"), the Party through the State Chair and Jesse, the Delaware Department of Elections an email through a representative of the Delaware Department of Elections, Kenneth A. McDowell (hereinafter referred to as "Bo," in his capacity as an agent of the Delaware Department of Elections, and not in his personal capacity), and additional people not relevant to this case, my request for a waiver from signature and or filing fee requirements, so as not to violate my religion, freedom of speech, and freedom of association, in order to be placed for on a ballot for the upcoming election for the US House of Representatives, via an email containing 4 attachments, including a letter to the Honorable Democratic Chair Erik Raser-Schramm, officially making this request. (See, Exhibit 5, the Email and the attachments thereto

including, Exhibit 5, A, the Letter and attachments to the Honorable Party Chair, Exhibit 5, B, (*excluding the attachments to the letters in 5A and 5B and attaching the same as Exhibits 21-29 herein to conserve paper and removing the old exhibit pages and removing the old exhibit pages *), the US Supreme Court letter and attachments, Exhibit 5, C, The US Supreme Court Response, Exhibit 5, D, the Attorney Grievance Commission of Maryland's determination relating to Justice Kavanaugh).

30. On October 28, 2019, Bo kindly responded back to my Email to confirm, I was no longer seeking to run for President of the United States. (See, Exhibit 6, Bo's email, Exhibit 6, A, Emails to Defendant Delaware Department of Elections relating to Plaintiff running for President, Exhibit 6, B, an Email to Jesse and the Party and the Party Chair through Jesse relating to running for President.).

31. I emailed Bo, the ACLU, Jesse, and people unrelated to this case, to inform them to please withdraw my previous request for a waiver of signature and fee requirements to run for President of the United States. (See, Exhibit 7)

32. On or about October 29, 2019, Jesse kindly replied to my email stating he "Just wanted to acknowledge receipt of your email. I will get back

to you once I've had the chance to discuss this with the State Party Executive team" (See, Exhibit 8).

33. On or about October 29, 2019, Bo kindly took time to talk with me on the phone, as he has so often generously has done throughout the last few years. He kindly indicated the Party Chair must grant me a waiver.

34. I sent Bo the attached email to confirm my understanding that I must hold off until a determination is made by the Party Chair. (See, Exhibit 8).

35. I followed up on or about Nov 18, 2019, with an email to Jesse and the Party, and the Party Chair to check on the status of the Democratic Chair and Committee's decision. (Exhibit 9).

36. Jesse requested clarification. I provided clarification concerning my waiver in response to Jesse, the Party, and the Chair on or about November 22, 2019. (Exhibit 9).

37. On or about January 28, 2020, I sent an email to Jesse and the Party Chair, Bo, and unrelated parties requesting that they "Please provide a response!" (Exhibit 10)

38. I received an official response in the mail, dated February 3, 2020, from the Party through the Party Chair, stating:

"The Delaware Democratic Party (the "Party") is in receipt of your October 28, 2019 letter requesting a waiver of certain filing fee and

signature requirements. In keeping with current party practice and to maintain the integrity of the primary process, the Party declines to reduce, modify or waive any filing fees for any candidate. We note that you may contact the Delaware Department of Elections for additional information regarding statutory requirements and the ability to seek a waiver thereof from that office in certain circumstances." (Exhibit 11)

39. On or about February 11, 2020, I sent the Delaware Department of Elections, via Bo, the Party's determination via email, and again sought a waiver of both the filing and or signature requirements from the Delaware Department of Elections,' in light of the fact such requirements violated my faith in Jesus Christ's teachings. (Exhibit 11, Exhibit 12).

40. On or about February 13, 2020, I followed up, and sent Emails to the Defendants, where I tried to explain, in another way, how collecting signatures violates my faith. (Exhibit 13).

41. On or about February 15, 2020, I completed the filing form, and signed it before a notary. (Exhibit 14).

42. On or about February 16, 2020, I sent the filing form via email to the Party, the Party Chair, Jesse, Bo, the Commissioner, via email. (Exhibit 14, Exhibit 15).

43. On or about February 17, 2010, I called the Commissioner to confirm receipt and to request a waiver of both signature and filing fee requirements so as not to violate my faith in Jesus Christ. The Commissioner

denied my request for a waiver. (Exhibit 16, a follow up Email confirming the conversation where the Honorable Commissioner confirmed receipt).

44. I attempted to persuade them via emails, and calls, to help them understand how the filing requirements violate my faith. (Exhibit 17, includes a variety of emails).

45. I also attempted to show the Defendants how well suited I am for the Democratic House of Representative seat by sending them various emails reflecting some of my efforts in proposing changes in the federal law and on garnering support to impeach on the 4 full separate articles of impeachment I drafted and a 5th one I started to draft. (See, Exhibit 18).

46. I am not ashamed of pleading with the Defendants to grant me a waiver. So, I do not have to disobey Jesus. (See, the Parable of the judge who lacked compassion. (See, Luke 18:1-8); (Also see, the funny parable of the man who kept bothering his neighbor in the middle of the night, until his neighbor gave him bread. Luke 11:5-13); (Also see, Luke 11:9, Matthew 21:22, Matthew 7:7 and James 4:3,)).

47. On or about February 23, 2020, I sent a number of emails to the Defendants where I demanded the Delaware Department of Elections, and the County Department of Elections and the Commissioner register my filing form as filed, as of the date received or in the alternative before the

filing deadline, without the condition precedent that I disobey Jesus Christ by conforming to the signature or filing fee requirements. (Exhibit 19).

48. I have not received a response to my demand.

49. I think the Department of Elections blocked my number. I attempted to call Bo, Kent County Department of Elections, Sussex County Department of Elections, and New Castle County Department of Elections. Unfortunately, it appears I have been blocked, as the "Your call cannot be completed at this time. Please try again later..."

50. Sadly, I failed to persuade the Defendants to register my form as filed.

51. So, I filed the Complaint in this matter, in an effort, *inter alias*, to secure the inclusion of Meghan Kelly's name as a democratic candidate for the United States House of Representatives seat for the State of Delaware for the upcoming election.

52. Pursuant to 15 Del.C. § 3101, "(1) Notification of candidacy shall be on or before 12:00 noon of the second Tuesday in July." (See, Exhibit 20).

53. That leaves very little time to respond to the pleadings.

54. That leaves very little time for me to provide notice to the public to gain their vote via non-compromising means such as newspaper articles, Facebook, and walk and talks.

55. I seek to run as a Democrat for the US House of Representative's seat in the state of Delaware.

56. I will likely face competition in the primary by Delaware's current democratic representative, in the U.S. House of Representatives, should this Honorable Court kindly grant me relief.

57. The Defendants refused to accept my filing form as registered, entered, filed and/or complete so as to assure me that I will be placed on the ballot for the upcoming election.

58. On or about October 28, 2019, I submitted the email, and attachments, including the letter to the Honorable Chair Erik Raser-Schram (hereinafter "Initial Waiver Request" or (IWR)," letter to the US Supreme Court, Court stamped Receipt, and ODC response from the Attorney Grievance Commission of Maryland relating to Justice Kavanaugh. (See, Exhibit 5, the Email and the attachments thereto including, Exhibit 5, A, the Letter and attachments to the Honorable Party Chair, Exhibit 5, B, (*excluding the attachments to the letters in Exhibits 5A and 5B and attaching the same as Exhibits 21-29 herein to conserve paper*), the US

Supreme Court letter and attachments, Exhibit 5, C, The US Supreme Court Response, Exhibit 5, D, the Attorney Grievance Commission of Maryland's determination relating to Justice Kavanaugh).

59. In the Initial Waiver Request, I noted "(A) caveat (relating to donations), I would be willing to accept donations from the democrat(ic) party as they cannot buy me or influence me since I am already a Democrat." (Id.).

60. I have since realized that donations from the democrat party also violate Jesus Christ's teachings and lead to corruption, as I communicated to Defendants. (See Exhibit 17, included communication along with other emails).

61. I attempted to explain how both filing fee and signature requirements violate my faith in Jesus Christ as I pleaded with the Defendants to grant a waiver, so as not to violate my freedom of speech, religion and right to run for office, by conditioning such rights on eliminating another Constitutionally protected right, as applied to me.

62. I should not have to be forced to sell my soul to Satan as a condition precedent, to run as a candidate in an election.

63. I should not be forced to disobey Jesus in order for an opportunity to gain an election seat.

64. The Defendants violate my freedom to worship or not according to the dictates of my conscience, not the dictates of the government's convenience, or the dictates of the convenience, profit and the power of a few who prefer to buy or barter candidates to serve their own personal agenda at the expense of the voters, the people they are charged to care for either by law, or by proclamation of the Party.

65. The Defendants violate my *freedom*, by such unconstitutional condition precedent as applied to me.

66. I define *freedom* as *free will* to choose: to think or ignore, to care or harden your heart to, to love or not. I choose to think, care, love God, accessible through Jesus, God, the father, and the Holy Spirit, not by mere words alone, but by faithfully doing his will, even if I am the only one.

I. PLAINTIFF'S RELIGIOUS BELIEF

67. Meghan Kelly repeats and incorporates by reference all of the above paragraphs and all of the below paragraphs, and the Exhibits the paragraphs refer to therein as admissible under nonhearsay and hearsay exceptions, including but not necessarily limited to, probative fact, state of mind, belief, admission by party opponent, as though set forth herein in the first instance.

68. My personal religious beliefs are in issue. So, I am providing additional facts concerning these relevant issues

69. I am a Christian, and I find guidance in the Bible.

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

71. In fact, I believe the root of corruption in both business and government is serving those who serve you, thereby serving yourself, instead of the people you are supposed to serve.

72. I believe living for self, and your own family, your own community and for those who affect, serve and benefit you, thereby living for self, without regard to others reflects the image of Satan. (Please see, Isaiah 14:13-14, Satan wanted to live for himself. He wanted to be his own God. Satan did not want to lay down his love for God, by in part loving others as himself, even outsiders, even the least of these. (Also see, Ezekiel 16:49, People were damned to hell for their unconcern "they did not help the poor and needy."); (Also see Matthew 13:18-19 "the worries of this life, the deceitfulness of wealth and the desires for other things come and choke the word, making it unfruitful," meaning those people will be burnt up in hell.); (Further see, Luke 17:26-34 where Jesus also gave us examples of people

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

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

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

75. Jesus said even evil people care for their children. (See, Matthew 7:9-12, "Which of you, if your son asks for bread, will give him a

stone? Or if he asks for a fish, will give him a snake? If you, then, though you are evil, know how to give good gifts to your children...").

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

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

78. I believe leaders who serve themselves and those who serve them are not good leaders. They are misleaders and deceivers, not public servants. They mislead and deceive those they purport to serve, to instead exploit them, to serve themselves by placing self first. Servants of Self are Servants of Satan. They not only harm those they are charged to care for in this life, they also mislead and deceive others to become Servants of Self, Servants of Satan too, thereby leading many to hell too.

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

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

81. I believe President Trump's winning at all costs, even at the cost of cheating, violating greater laws, of justice, mercy and faithfulness (See Matthew 23:23), makes us all lose, modeling the reflection of the image of Satan called the "lawless one" by his disregard of laws that teach us to care about other people. (Citing, 2 Thessalonians 2:8, also see Psalm 101:3); (I define evil as absence of love because "God is love." 1 John 4:16, People

without God in their hearts have an emptiness they attempt to fill with fleeting fancies, fleeting feelings, fleeting funding or other idols in place of God's love).

82. I believe some Republicans in office teach the image of Satan, the lawless one, as good by teaching everyone for themselves under the facade of responsibility, without love or concern for outsiders or those beyond their own, misleading those they serve to harm and hell. (Citing, 2 Thessalonians 2:8).

83. It makes me sad because I believe some Republicans in office violate the First Amendment and God's laws by using God's name for their own vanity, meaning their own purpose in place of God's purpose, to serve power and profit under the guise of God thereby misleading people to harm and hell.

84. Sadly, I believe people go to hell for their confusion. Satan, the lower case god of this world, confuses to kill eternally. Pull 2 Corinthians, Chapter 4 to confirm.

85. So, I seek to draft laws to alleviate confusion as to what is good and evil, to correct not to condemn, to prevent harm in this life and eternal life.

86. I also seek to be in a position to impeach President Trump since it is likely he will win by cheating, election hacks.

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

88. The Holy Spirit, via God, via my conscience, teaching me to care, to love, is leading me to do the same as the prophets, to correct the President by seeking a position that will allow me to impeach him, in hopes to heal not only the victims of the harm he causes, but to heal his ugly heart with God's truth in love, not deception. God loves other people too, even your enemy, people of other political affiliations, races, religions, and places of origin, even if they do not know God, even if they have not accepted God's love. President Trump sins against God and man by harming others to serve self. (Daniel 13:45 "God stirred up the Holy Spirit of a young boy named Daniel."); (See, Genesis 41:38, Exodus 31:3, Numbers 11:17, Numbers 11:25); See, Deuteronomy 34:9, "The holy spirit is also called the "spirit of Wisdom,"); (See, Judges 3:10 The Holy Spirit is also called the **"spirit of the Lord"** The holy spirit works the same in the Old testament too. It is the same God.); (Also see, Romans 8:14 **"those who are led by the Spirit of God are children of God,"**(emphasis intended)); (Also see,

Psalm 51:13, Wisdom 1:5, See the entire book of wisdom too, See, Matthew 1:18); (See, Matthew 12:32 "And whoever speaks a Word against the Son of Man will be forgiven; but **whoever speaks against the holy Spirit will not be forgiven, either in this age or in the age to come.**" (emphasis intended)); (See, Matthew 28:19 "Go therefore and make disciples of all nations, baptizing them in the name of the Father, and of the Son, and of the **Holy Spirit.**"); (See, Mark 13:11, Mark 12:36, Mark 3:29, Matthew 3:11, John 14:26, John 16:13, John 14:17, Ephesians 1:13, 1 John 4:6); (And see, John Chapter 3, Regarding being born again, being born of flesh in human life and of **spirit** receiving eternal life the same as Moses and Daniel did in the Old Testament.).

89. In Ezekiel Chapter 34:1-10, God scolds leaders, shepherds who take advantage of the sheep to serve themselves instead of caring for them. "Woe to you shepherd of Israel who only take care of yourselves! Should not shepherds take care of the flock? You eat the curds, clothe yourself with wool and slaughter the choice animals, but you do not take care of the flock...." Id. (Also see, Jeremiah 23:1, and Zechariah 11:17).

90. My religious beliefs prevent me from gathering money or signatures in adherence to the requirements under 15 Del.C. § 3103.

91. Even if I had the money to pay my religious beliefs prevent me from paying the filing fee.

92. Payment of the filing fee violates my freedom not to speak and freedom not to encourage conduct, payment and use of money that I believe leads myself and other people to harm and hell. I believe it is wrong.

93. I believe paying the filing fee is a sin against God.

94. I will not collect donations or signatures from individuals or lobbyists as this violates my religious beliefs against partiality and favoritism, serving those who serve me, thereby serving myself, by potential invisible strings attached to such donations.

95. I am a Democrat because they love people, not money. Democrats tend to serve people, not greed. I believe people go to hell for seeking money in place of God. (See Matthew 6:24, and Luke 16:13, "You cannot serve God and money."). (Also See, See, Luke 19:45-48, Malachi 3:1-3, Matthew 21:12-13, Mark 11:15-19, John 2:13-17, Jesus chased people out of the temple for stealing the real treasure, people's eternal lives.); (See. Matthew 23:15, Jesus told the leaders they were making their followers twice as worthy of hell as they were since the leaders taught them to focus on money instead of God.)

96. I would be a misleader, not a leader, if I taught people to serve greed instead of teaching them to care for one another since I believe serving greed leads many to hell. (See, Acts 8:20, "Peter answered: 'May your money perish with you, because you thought you could buy the gift of God with money!']"). People are more valuable than money. God commands us to love people not money. In John 13:34, Jesus said "A new command I give you: Love one another. As I have loved you, so you must love one another."

97. I am a leader because I think for myself after analyzing facts and laws. I will seek to do what is in the best interest of the American people, not what immediately pleases some of their immediate desires only to harm them down the line. That is wrong. I take responsibility for my decisions made on behalf of others, and I will not be influenced by money or support.

98. I was correct when I wrote to the Party Chair, "I do not believe the Democratic party will support me though I support their love for people and the environment over profit. I am against two positions the party heads seem to support." in the October 28 letter. (Exhibit 5, B).

99. By their failure to grant me a waiver, thereby persecuting based on my religion, this powerful group of a few, the Party, indicated they do not respect or support my freedom of religion.

100. With regards to two issues that the powerful few support since it supports their pockets, I do not encourage or support abortion and the death with dignity acts. I believe they harm people, or potential people not only here, but in eternity too. I would be a bad leader if I led people I served to harm people or themselves for mere temporary ease, comfort or profit.

101. I am against abortion. I do not believe they go to heaven. I believe they were robbed of the opportunity to be born of flesh and born of spirit. (See John Chapter 3:3-8, "Jesus replied, very truly I tell you, no one can see the kingdom of God unless they are born again. ... Jesus answered, very truly I tell you, no one can enter the kingdom of God unless they are born of water and the Spirit. Flesh gives birth to flesh, but the Spirit gives birth to spirit..."). Accordingly, the potential people not only lost life in this life, they lost eternal life too. (Also see, Ezekiel Chapter 9 Children can choose a way of life leading to hell too).

102. I am also against the Death with Dignity Acts. Many people may make mistakes, even professionals and experts such as doctors and health care professionals. None of us are gods. They may misunderstand or

may lie for money or convenience. So great injustice may result. Ignorance or error will not reverse the harm done.

103. Further, I believe people may go to hell for killing themselves. It is not loving to encourage those you serve to die and go to hell out of convenience, comfort, or martyrdom for the temporary convenience for themselves or other people, or to save money. People are more valuable than money, things or comfort. There are two examples of people who killed themselves and went to hell in the bible. King Saul in the Old Testament, and Judas Iscariot.

104. Pursuant to 1 Samuel 31:4, "...Saul took his sword and fell on it." Saul killed himself. In 1 Chronicles 10:13 provides, "Saul died because he was unfaithful to the LORD; he did not keep the word of the LORD..." I do not believe he went to heaven because of these words.

105. The other example is Judas Iscariot. In Matthew 27:1-10, Judas said sorry, confessed his sin, gave the 30 shekels back. Unfortunately, he gave into despair instead of repenting by faith and trust in God's love and mercy. He killed himself instead of living to love God and love those God loves, everybody even our enemies.

106. In John 17:12, Jesus says. "he was doomed to destruction." So, I do not believe Judas escaped Satan's goal damnation.

107. I believe we live or die for God. Citing, Romans 14:8. Those who live and die for self or for mere people instead of God do not go to heaven.

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

109. I believe Jesus was not kidding when he said unless your “righteousness exceeds that of the scribes you will” not go to heaven. Matthew 5:20. I believe our righteousness exceeds that of the scribes by our trust in God.

110. The Bible teaches, Abraham believed what God said. His belief was attributed to righteousness. Citing, Genesis 15:6. Abraham listened to God to the point he was willing to sacrifice his own son.

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

112. In the Parable of the ten virgins in Matthew 25: 1-13 Jesus tells a story of ten virgins traveling to a marriage feast. All ten virgins had lamp oil. Five ran out, and asked those who had oil to give them some. Those

with oil responded rightly by telling those without, no, go buy your own or we will not have enough ourselves. They did not even say sorry. Those who bought the lamp oil did not get back in time and were locked out of the marriage feast, meaning they went to hell.

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

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

115. I am against the Death with Dignity Acts because I believe the most important time of our lives is at the end pursuant to the Bible. In Ecclesiastes 7:1, “the day of death better than the day of birth.” In Ezekiel, the Bible says if you do good all of your life and turn away from the good, none of the good will be remembered. In Ezekiel, it says if you do evil all of your life and turn away from the evil, none of the evil will be remembered. (See, Ezekiel 18:21-24, Also see Ezekiel 33:12-16). Further, in the Parable of the Sower in Matthew Chapter 13, only those who understood and kept

the truth in the end were saved from hell. Also, in Matthew 24: 13, we learn that only those “who stand firm in the end” will be saved.

116. On an aside, I believe non-Christians may go to heaven (or hell) through Jesus on that last day. See, Hebrews Chapter 11. Also see the verses about the new covenant written on our hearts. When I think of tribes in unreachable parts of the land I think of Romans 2:15. “They show that the requirements of the law are written on their hearts, their consciences also bearing witness, and their thoughts sometimes accusing them and at other times even defending them.” (See also, Jeremiah 17:1, Jeremiah Chapter 31, Nehemiah 7:5, Ezekiel 36:26 relating to God’s law or God written in our heart.)

117. I understand with the acceptance of the cloak of government power I will lose some of my power to speak on my personal religious beliefs in order to uphold the freedoms of those I serve and prevent a chilling effect.

118. My beliefs are genuine.

119. I ran for local office and espoused the same beliefs on collecting donations and fundraising. (Please see Exhibits, 21, 22, 23, 24, 25).

120. My faith in Christ is genuine. I confronted the Delaware Supreme Court when they violated my religious rights to affirm instead of swear into the Delaware Bar. (See Exhibit, 26).

121. I twice rejected appointments to family law matters as violating my religious beliefs (See Exhibits 27, 28).

122. I confronted the Courts in Delaware per the attached letter concerning impartiality and bias. (See Exhibit 29); (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.").

123. I even shared my view on what using the name of God in vain means when I proposed a suggestion to Senator Tom Carper of Delaware. (See, Exhibit 30). I believe it means using the name of God, or religion or scripture for man's purpose instead of a true religious purpose.

124. I believe it would be wrong to pay the filing fee and/or to collect signatures or donations from anyone even the Party or the

Democratic groups, as it would create the appearance of influence and favoritism in violation of the bible's teachings as we are called to serve everyone's best interests, not merely those who support us, or pay us with money or benefits such as signatures. We are not supposed to buy or barter for via collecting signatures or pay for party or people's favor, loyalty or support for allowance on the ballot either. That is a sin against God. (See, James 2:1, "do not show favoritism."); (James 2:9, "But if you show favoritism, you sin and are convicted by the law as transgressors."); (Deuteronomy 16:19, "Do not deny justice or show partiality. Do not accept any bribes, for a bribe blinds the eyes of the wise and twists the words of the righteous."); (Proverbs 18:5, "Showing partiality to the wicked is not good, nor is depriving the innocent of justice."); (Proverbs 24:23, "These also are sayings of the wise: To show partiality in judgment is not good."); (Malachi 2:9, "So I in turn have made you despised and humiliated before all the people, because you have not kept My ways, but have shown partiality in matters of the law."); (Job 34:19, "who shows no partiality to princes and does not favor the rich over the poor, for they are all the work of his hands?"); (Job 13:10, "Surely He would rebuke you if you secretly showed partiality.").

125. Paying the filing fee and/or accepting signatures or donations from individuals or groups, even democratic groups, creates an expectation of a return in violation of God's instructions. In Romans 13:8 the Bible teaches: "Owe nothing to anyone except for your obligation to love one another..." The acceptance of money from individuals and lobbyists creates an appearance that I am bought. The paying of the filing fee allows the Party to use the fee to buy the support of candidates or for candidates. That violates the bible's teachings on impartiality.

126. I believe it is wrong (a sin against God) for the Party to pay a team to support their interest or candidates.

127. I believe it is wrong (a sin against God) for the Party to donate to candidates, as it is likely to lead to buying of favors and influence in violation of my faith in God.

128. The filing fee is used to buy votes, by buying support. That is wrong. Votes should not be bought.

129. I believe it is wrong for candidates to teach people wrong by teaching the voters they earn support with money.

130. I seek to gain support with true leadership, love for others, by service to others by presenting my plans to take care of Americans relating to healthcare, social security, and the environment.

131. I believe the vote is the only non-corrupt, impartial means to show support or lack thereof.

132. No one knows how anyone votes, accept them and their God unless they disclose it.

133. Thus, the right to vote, and to run for office without conditioning such right on eliminating another fundamental right, must be protected.

134. On an aside, to alleviate your fears, I understand there are not only checks and balances within the three branches of government, there are also internal checks and balances within each of the individual branches.

135. With the acceptance of the cloak of government authority, I understand my rights will be more limited in order to uphold the rights of those I hope to serve.

136. My rights to speak out on my faith will be more limited in order to uphold the religious freedoms of the American people should I be elected.

137. Americans should worship or not according to the dictates of their own conscience, not the dictates of the government.

138. I will treat everyone with respect regardless of religion, race, gender or place of origin. I am not scared to love outside of my own. I am commanded to.



139. Since, I do not wish to violate the Bible's teachings on impartiality, I respectfully, request Defendants filing fees and/or signature requirements be waived under 15 Del.C. § 3103.

**III. POLITICAL PAST, A GLIMPSE OF CORRUPTION,
BARTERING & BUYING CANDIDATES, SERVING POWER AND
PROFIT INSTEAD OF PEOPLE**

140. I am a registered democrat.

141. I previously ran for office in 2018 for the State House of Representatives Seat for the 38th District as a Democrat.

142. I paid the filing fee during that time, and accepted donations from Democrats during that time. (See Exhibit, 31).

143. Due to religious reasons, in 2018, I only accepted donations from the formal Democratic groups.

144. In 2018, people told me we would get our filing fees back because that was the custom.

145. In 2018, no one running in Sussex received their filing fee back per the County Democrats.

146. In an Email attached hereto as Exhibit 32, dated September 18, 2018, I responded to Jane Hovington's determination and or the Sussex County Democrat's determination that no Sussex County Candidates would receive their filing fee back:

"Hi Dolce, Thank you for stepping up to help us. I am not accepting donations from anyone, but the Democratic party groups for religious reasons. I am a Christian. I do not want to violate Matthew 6 and support the false praise of President Trump for his alleged charitable works.

People in Sussex support him, though his conduct is not praise worthy. He is misleading so many people I love.

We should lay a foundation for success not only for this election, but for future elections. I'm disappointed the Democratic Party for the state has not helped me either. I grew up in Sussex. I was raised here. The reason why so many do not support our party is because they do not believe we support them. My neighbors lament that the democrats only care about upper Delaware, not lower Delaware. We have more people running on the democratic ticket this year than other years. If Sussex Democrats are merely concerned with the federal and Presidential elections, that actually may confirm the false beliefs of my neighbors and hurt the democrats down the line.

Democrats care about everyone, we are the party of inclusion. We care about the North, upper Delaware, and the South, lower Delaware, and everything in between.

Please help me, help you bring the blue back. Please help the other candidates too.

Thank you,

Meg" (See, Exhibit 32)

147. The County Democrats indicated they would support the national and federal elections not the county seats. They would not return the filing fees back like they allegedly did in prior years.

148. In addition, the 38th District kindly helped me by a donation. (See, Exhibit 33).

149. Yet, the 38th District misstated the amount the group was allowed to contribute to be a lower amount than the \$3,000.00, allowed limit per candidate.

150. I sent the 38th District members an email to correct the miscommunication of the amount candidates were allowed to receive was \$3,000.00 from democratic groups not a lesser amount. (See Exhibit 34)

151. I believe the fact the County Democrats did not support local candidates and the misstated lower fee of campaign limits evidences both the County Democrats and the 38th District Democrats were compromised into serving those who serve them, supporting those who support their pockets, or personal interests, not who will do what is right.

152. This is an example of why I believe the filing fees, and donations contribute to the corruption in politics, while also violating Jesus Christ's teachings. The fees and donations teach people to reflect the image of Satan, serving those who serve them thereby serving themselves, instead of seeking to do what is right, not self serving.

153. Please note, the emails relating to the 2018 examples, was before I became wiser. more educated and learned the corruption relating to paying filing fees was a wrong. It is a sin.

154. Sadly, I learned that Democrats try to buy different democrats too, thereby compromising their integrity and their eternal souls.

155. Thankfully, I believe there is no condemnation in Christ, so long as I turn away from the sin of paying the filing fee and accepting

volunteers or checks from the Democratic Groups too, and turn towards God's will.

156. I have since 2018, realized that paying the filing fee would violate Jesus Christ's teachings, and be a sin against God.

157. I have since 2018, realized that accepting volunteers, and donations, even volunteering signatures from the Democratic organization or others violate Jesus Christ's teachings too.

158. During 2018, I told the members of the 38th Democrats I would not take donations or give donations from individuals.

159. Many participants in the 38th District appeared to be involved in other groups and entities that asked for donations. Yet, I would not buy votes by giving money to those who purport to support me thereby sinning against God by supporting myself. Nor, would I accept money or volunteers from such group thereby allowing myself to be bought, or to become biased, or compromised by the desire to serve myself at the expense of those I hoped to be charged with serving.

160. I am priceless, not a price tag.

161. People are priceless not price tags, to be bought or bartered for with filing fees, donations, signatures, and such thereby compromising their integrity to do what is right instead of what is self serving.

162. Such groups have narrow interests, not necessarily focused on serving people outside of their own with additional and different interests, yet important too.

163. Thus, when members of groups, such as the Party, give donations to candidates, they compromise the candidates' ability to serve those they are charged to serve with the temptation to serve those who serve their seat instead.

164. I faced disdain and persecution related to my religious beliefs because of the unusual manner I campaigned back in 2018.

165. One of the head Democrats demeaned me in front of everyone at a meeting, Dr. Mohammad Akhter. (See, Exhibit 35, Also see Exhibit 38, regarding information relating to conflict with major campaign contributors to both parties, the healthcare industry, and the apparent agenda that Dr. Mohammad Akhter purported to support).

166. Even more insultingly, I discovered most of the people at the meetings did not read my campaign material or the few articles I drafted in the local paper, the Coastal Point

167. I believe some of the powerful democratic members only cared about what they could personally get out of me, and not anything beyond that, including how well I could serve. (Reflecting the image of Satan. (See,

Isaiah 14:13-14.); (Cf, Matthew 23:11 "The greatest among you is your servant." Servants of self are not great. They mislead and deceive those they purport to serve to serve themselves instead. Good leaders teach those they serve to be great too, by teaching them to serve one another not exploit and harm one another to serve greed.).

168. In 2018, I was invited to a meeting by official members of a Democratic group, where I thought the Democrats of the 38th District were offering their support, financial and otherwise because they said they were going to help me out. Instead, to my horror, they asked me not to run for the 38th House District Seat after I expended my time, effort and own personal funds on material. (Exhibit 35).

169. The powerful few democrats who chose to be involved in party picking in the 38th District thought they could buy my seat by offering to return my filing fee, and offering an alternative to run for another office, such as the Recorder of Deeds, with a waiver of filing fees.

170. They were wrong to think I was running to gain power. I ran because I wanted to make a positive difference in the lives of those I had hoped to serve via drafting and amending laws to serve people and to protect them from exploitation by those who serve greed. Mere power is not what I seek,

171. I contacted Jane Hovington, a big whig in the Sussex Democratic Party, concerning her lack of support or knowledge of my legislative agenda. (Exhibit 36, concerning emails and the attachments thereto, relating to our communications).

172. To my horror, many of those within the party did not educate themselves about local candidates, including myself. It seemed like a mere job that some were paid to care about, and their concern did not go beyond their paid support.

173. At one instance at the Democratic headquarters, I tried to calm down a member (herein referred to as "the Member") of the Democrats after she called Robert Arlett ugly words.

174. I said we should adhere to Michelle Obama's saying "When they go low. We go high."

175. The Member responded by pointing her finger at the door of the headquarters for me to get out, while indicating she had more experience and I knew nothing because of my youth.

176. I left the Democratic headquarters.

177. I forget the Member's exact words, but I communicated with Jane Hovington ("Jane"), who observed this event concerning this event.

178. Instead of comforting me after such harsh remarks, Jane instead sympathized and thus encouraged the misbehavior based on the Member's fleeting feelings, instead of encouraging the Member to control her feelings (instead of allowing them to control her), and to respect others, including me, regardless of age and apparent experience in politics.

179. I forget what the exact words the Member said, but I followed up with the attached email to Jane Hovington in addition to contacting her by phone, from a number I no longer have.

180. I sent Jane the scripture regarding let no one demean you because of your youth, with a picture of the attendees at the meeting where the event occurred. The lady sitting next to me, wearing the Carper shirt, was the lady who forced me to leave. I do not know her name, but it is notable I saw her picture is on a sign on Route 26 near Hockers, advertising the health industry. This is the industry I desire to draft laws to prevent the massive killing and bad care I have learned about throughout history, and via recent history, by inter alias its contribution to the addiction crisis and the alleged molestation of babies by Dr. Bradley in Delaware. (Exhibit 37).

181. Jane openly professes her faith in Christianity. So, I did not fear offending her by citing the Bible.

182. I also sent the attached emails to Jane concerning her, and thus the Democrats, lack of support for my campaign. (Exhibit 36).

183. On the day of the election, I visited all of the voting stations in the 38th District in lower Delaware.

184. To my horror, most of the voting stations only handed out the attached anti corruption handout, not the handout with my platform. So, the stations did not allow voters to read about the good I hoped to do. Instead, they merely were able to read my anticorruption hand outs that cited the Bible and the fact I would not participate in fundraising events due to my belief in Jesus Christ's teachings. So, it made me look unusual and possibly weird or offensive to those who do not believe the same on the most important day, election day. (See, Exhibits 21 and 22).

185 In fact my anticorruption handout did upset someone early on.

186. Prior to the election in 2018, I received free training in Dover where someone looked at my material and scolded me. She was offended by my quote from Jesus Christ on the anticorruption brochure relating to the fact I was not going to attend fundraising events. She said she was going to support me, but was no longer supporting me because of the quote. She was so angry at me. (See, Exhibit 21).

187. Sadly, I amended my brochures to change the word temple into "places of worship" or something similar, since she was Jewish. I did not desire to offend her. I merely desired to obey Jesus Christ by not participating in fundraising.

188. The anticorruption handout originally included, in part:

"I was thinking about doing fundraising at restaurants, but changed my mind when someone asked me to go to a dinner fundraiser because it would be good for my campaign.' I immediately thought of the scripture. "Everything they do is done for people to see...They love the place of honor at banquets and the most important seats in the **temple**; they love to be greeted with the respect in the marketplaces..." Matthew 23:5-7. "(emphasis intended).

189. I changed the handout to replace "temple" with "[places of worship]" in a revised handout providing, in part:

"I was thinking about doing fundraising at restaurants, but changed my mind when someone asked me to go to a dinner fundraiser because it would be good for my campaign.' I immediately thought of the scripture. "Everything they do is done for people to see...They love the place of honor at banquets and the most important seats in the **[places of worship]**; they love to be greeted with the respect in the marketplaces..." Matthew 23:5-7. " (See Exhibit 21, emphasis intended).

190. I felt sad for changing Jesus Christ's words based on the discomfort it caused others, and one lady specifically.

191. On election day in 2018, as I visited each of the voting stations in the 38th District in Delaware, I also saw the boards I created for each of

the stations were knocked down. So, people could not read the newspaper articles or brochures I placed on the boards.

192. I lost the election in 2018. I had little support from the Democrats. Though some offered to hand out papers for one day, but required my mother and I to perform their job of handing out all the Democrats papers to certain listed locations. So, they used me for their personal agenda instead of supporting me, which reflects the corruption in politics. (See Exhibit 44, a picture of one of the people offering to hand out my material with my mother, only in exchange that I hand out other Democrats stuff, thereby reflecting the corruption in politics (while violating the Bible's teachings), by doing what is self serving, not what is right.)

193. Jesus, in Matthew 6 teaches "Do not give your (charitable) alms seen. Do not be like the hypocrites." When you give charitable love "do not know your left hand from your right hand," meaning do not give out of one hand to get out of the other. Giving to get something in return, such as asking folks to volunteer signatures or donations or to door knock, in exchange for something, such as supporting their personal desires instead of what is best for the people, not only compromising the integrity of the candidates running for office, it also misleads and deceives people to harm and hell, under the guise of good.

194. Jesus teaches do not charity give seen period. I believe people are damned to hell because of the deception volunteering, including volunteering signatures, volunteering donations, fundraisers, girl scout cookie sales, car washes, alleged charitable races, school pizza drives, donations to organized groups or organized charities, go fund me pages and the like wrongly teaches people.

195. It is no small sin. Teaching giving to get, is unconditional charitable love, wrongly drives out the love from the hearts of man, the God from the hearts of man because "God is Love", and replaces it with the love of money, or the desire to serve self, instead of unconditionally loving and respecting others, without requiring they earn it.

196. This evil done under the guise of charitable good teaches people wrong. The Bible teaches people go to hell because they learn wrong, and do not unlearn deception as truth. People go to hell because of their hard-hearted ignorance, misunderstanding, and for not knowing truth. Not knowing is not innocence. It is evidence of guilt, not caring to know, caring to love. Even children may be damned to hell on judgment day. To confirm, pull Ezekiel Chapter 9. (See, Isaiah 44:18 regarding "stupidity and ignorance" that damns); (Also see, Ephesians 4:18, Romans 1:21); Also see, Matthew 13 the Parable of the Sower, only those who understood were

fruitful, not to be burnt up, meaning damned to hell for eternity); (See Isaiah 9:16, "For the leaders of the people mislead them, and those they guided are led astray.").

197. People wrongly learn giving money seen, or volunteering seen, or volunteering signatures is good, and somehow contributes to good, even though I believe it contributes to corruption, and thus contributes to evil. People praise those who volunteer signatures, volunteer time, and donations as good, as making a difference.

198. Meanwhile, I think giving charity or volunteering signatures or otherwise seen or conditionally is evil. I believe the vote is the only noncorrupt, uncompromised form of voicing support.

199. Poor people may not have the resources to volunteer such as vehicles or gas money. Poor people may not have the money to donate. So, people who are misled into thinking giving seen is good wrongly learn to think poor people cannot be good because they do not contribute or give seen.

200. The next thing you know, people are condemning the poor they hypocritically profess to be helping by charity, by evil thoughts and words, calling them names or thinking they are bad, lazy deadbeats and the like.

201. By giving charity seen, I believe people sin against God and man and mislead people to harm and hell by teaching the world business is charitable love.

202. There is no sin in mere business.

203. The sin includes misleading, wrongly teaching people by example, by the example Defendants require I adhere to under 15 Del.C. § 3103, that business is love and thereby replacing the unconditional love in the hearts of men with the love of money or the desire to be served instead of to serve.

204. Since, Jesus teaches you cannot serve God and money, I believe such deception misleads people to hell. It is not okay.

205. Paying the filing fee would be a sin against God by such bad example.

206. I believe the filing fee money will be used in activity I believe misleads and deceives others to hell. I do not want to encourage conduct that communicates something evil is ok thereby harming those I seek to serve.

207. The freedom of speech, includes my freedom not to speak by communicating what I believe is a satanic, eternal life-threatening message

by paying the filing fee or asking people to volunteer donations or signatures only to compromise their eternal souls.

208. I believe the filing fee may also be used to pay people, prostituting them to support whoever they are paid to support, by door knocking, calling people, and other tasks, all I see as paid corruption, in violation of my religious beliefs. (Reflecting the image of Satan under the guise of good.). Far worse, the money may be used to help pay for other candidates' materials and campaigns, in a sense, buying the candidates loyalty to serve those who support or fund the candidates' campaigns instead of serving those they are charged to serve. Teaching the candidates to I believe reflect the image of the devil misleading them to hell should they not repent.

209. I contacted all 541 members of the Federal Congress by various diverse means in an attempt to garner support for impeachment. (Exhibit 40).

210. I personally drafted 4 drafts of articles of impeachment to impeach President Trump on. (See Exhibit 18).

211. I started a 5th Article of impeachment. (See Exhibit 18).

212. I sent the articles to most of the House Judiciary Committee.
(See Exhibit 40, This Exhibit includes additional Emails to the Judiciary Committee).

213. I also emailed, and mailed them out to a few other members, including but not limited to Representative Rochester, Senator Coons, and Senator Carper.

214. I hand delivered copies of the articles to Representative Rochester's office in Sussex County as well.

215. I even faxed various members of congress the articles too.

216. I spent hours calling members of congress about impeachment.

217. I also called members of congress to confirm whether they received a post cards I sent to all 541 members.

218. Many of the staffers had no idea what I was talking about.

219. Both Senator Coons and Representative Lisa Rochester responded to my communications indicating it was not the appropriate time to impeach. (See, Exhibit 41).

220. I learned the leaders, or shall I say those I believe to be misleaders in congress, wasted people's time, which is more precious than gold, by encouraging people to merely feel like they were contributing or

making a difference by investing hard work, and effort to contact those in office.

221. I discovered many congressmen and congresswomen focused on looking good, making people feel good without actually doing good, which I believe is no good.

222. So, I will not waste people's time by encouraging people to contact me when I know I will be working hard. So, I will not have time to read their hard work, should I hold a public seat.

223. I contacted President Obama more than once and received boilerplate responses. If you look at the attached Exhibit 42, you will see the same letter sent to me twice. In one letter President Obama called my Linda by mistake. So, I think they send letters out without actually reading what voters send in. I hope others do not waste time contacting representatives like I did. (See, Exhibit 42).

224. I believe many leaders in congress teach people to praise evil as good, by praising what serves their seat by serving those who donate and volunteer for them, instead of what is right. That is wrong. I do not want to be like them. I choose to be who I am, "not conformed to the world, but transformed by the renewing of my mind." (Citing Romans 12:2).

225. I remember reading about someone in the paper who was involved in the chicken business, who donated 1.8 million to cancer center, when he **may** have caused the pollution creating the cancer by his involvement in certain tasks in the chicken industry, thereby profiting two wrong doers, overcharging health care providers who at times conceal and kill, instead of heal, and people who profit off of the life threatening pollution they cause by such marketing, bought good will, and trading and or buying favors or bartering for political loyalty. (emphasis intended).

226. I believe such charity as the donation to a cancer center I read about in the paper, violates Matthew 6 and misleads people to harm and hell.

227. Throughout American history, I believe politicians and charities such as the Rockefellers have served Satan and have caused harm and eternal damnation to many under the guise of good.

228. I keep myself separate. Scripture says "Be holy because (God) is holy. Jesus says be perfect like your heavenly father is perfect. That means do not sin just because everyone else does. Evil is still evil, even when the masses are misled into believing evil is good. (See, Leviticus 20:26, Leviticus 11:44, Leviticus 19:2, Leviticus 21:8, 1 Peter 1:16, relating to be Holy because I (God) am Holy, See, Matthew 5:48 Jesus commands "Be perfect, therefore, as your heavenly father is perfect." Also see, 2

Corinthians 6:17 "separate yourself from them" meaning do not sin like they do.).

229. I think some Delaware democrats and republicans in office may be bought with donations or support by those who profit off of wrong doing, poisons or poisoning, like hospitals who profit off of sick people, polluting chicken plants, polluting farms, polluting factories and Artesian who profit off of dirty water, while committing Matthew 6 violations, creating conduct that I believe not only harms people, but damns them to hell.

230. I believe it is satanic when people only will help you if you compromise your soul, instead of doing what is right, because it is right, or when they only seek what is self serving and sell whatever that is to the masses under the facade of right.

231. I am repulsed when leaders sometimes plead ignorance when foreseeable harm results. Yet, ignorance is not innocence. Leaders often ignore the foreseeable harm. They choose not to care, or far worse pretend not to know when they do because they exploit economic, social and political strains for their own gain instead of alleviating strains to care for the people they are charged to serve.

232. I do not believe the same way as others. I do not think the same way. I should not be persecuted for my diverse religious beliefs.

233. I experienced persecution from people from Republicans too, including my opponent Ron Gray during the burying of the hatchet parade per the attached email. Representative Ron Gray and his three companions were so mean to me that I started to get teary eyed. I jumped out of the very slow-moving convertible during the parade. Honorable Senator Coons Secret Services men, Officer Hughes, and Senator Steve Smyk kindly rescued me that sad day. (Exhibit 43).

234. I sent Jane an Email concerning the above referenced mistreatment during the 2018 parade. I sent her pictures of Ron Gray and I smiling before I entered the vehicle and it became ugly, pictures of Steve Smyk without me, a picture of me in Ron Gray's vehicle, and a picture of me in Steve Smyk's vehicle. (Exhibit 43).

235. Even though I am a democrat, Senator Smyk showed me great kindness and showed the world true leadership by loving those outside of his own, as did the heroic Officer Hughes who is respectful to all people, and Senator Coons' secret service men, including Shawn.

236. Doing the right thing takes courage because many people often want what is self serving immediately, not what is right.

237. I believe we are commanded to be the light of the world because we know God. Others do not know God. So, we are to shed light

on other people's feet to prevent harm here and damnation into eternity. God loves other people too.

238. I believe the entire command summed up is to love God and love one another. Yet I think people confuse praising sin, flattery, encouraging fleeting feelings or fancies or providing false assurance or saying "do what you want," instead of saying do what is right, as love. Hurting yourself or others is not good because God loves you and loves others too even non-Christians. So, it is a sin against God. See, Matthew 22:36-40, Also see, John 13:34, John 15:17.

239. Yet people want to do what they want to do, without love for God, others or at times even themselves, thus reflecting the "lawless one" Satan, leading to harm and hell. (Citing, 2 Thessalonians 2:8).

240. Scripture teaches me to "Have nothing to do with the fruitless deeds of darkness, but rather expose them. It is shameful even to mention what the disobedient do in secret. But everything exposed to light becomes visible and everything illuminated becomes clean." Citing Ephesians 5. I believe this means that the darkness is transformed into light, saving by transformation the wrongdoers into right-doers thereby saving their souls by such painful correction. I believe we are called to guide those in darkness



to love people, not material things, money or merriment to the extent they hurt precious people God loves to gain the world.

241. I am not willing to exchange my soul to gain the world or a place on the ballot by teaching darkness is light by collecting donations or signatures or paying the filing fees, and that light is darkness by choosing not to love God enough not to make my personal case for Jesus Christ. (See, Matthew 16:26. Jesus says "For what profit is it to a man if he gains the whole world, and loses his soul? Or what will a man give in exchange for his soul?"), (Also see, Isaiah 5:20 "Woe to those who call evil good and good evil, who put darkness for light and light for darkness, who put bitter for sweet and sweet for bitter."))

242. I believe leaders should care about other people more than serving their seats or winning an election. (Matthew 23:11).

243. When leaders care about winning and serving themselves more than the people they purport to serve, they mislead those they serve to reflect this same image, the image of Satan too, misleading them to harm and hell.

IV. PLAINTIFF'S FUTURE INTENT

244. I also intend to run as a Democrat in future races, beyond 2020.

245. I have a desire to run for office in order to draft just laws to serve God.

246. Jesus Christ indicated "justice, mercy and faithfulness" are greater, more important, commands than rules relating to mere material things or money. (Matthew 23:23).

247. Throughout scripture in the Bible and by the grace of God through the Holy Spirit, I learned the difference between unjust decrees and just laws.

248. Unjust laws teach people to love money, profit and pleasure to the extent people are willing to harm, and exploit others to serve greed.

249. This not only causes economic harm, and potential harm to human life and health, it also causes eternal harm. " You cannot serve money and God." (Luke 19:45). Those who serve greed go to hell.

250. Unjust leaders teach people to focus on money and merriment, fleeting feelings, fleeting fancies and fleeting funding. They teach people to reflect the image of Satan by living for self and for those who affect them, thereby living for self like Satan, without reflecting love, (the image of God because "God is Love"), to others outside of their own or God (because God loves other people too). Per Isaiah 14-13-14, Satan wanted to be his own God.

251. I believe people who live for self and their own families and their own people without love for others or God because God loves others

too are sadly children of the devil, not yet adopted by the God that loves them and seeks to save these confused kids from the misbehaving dad, the devil, who seeks to harm them, others and damn them to hell. (See Matthew 13:38 regarding "children of the evil one"); (See, John 8:44 and 1John 3:10 Regarding "children of the devil"); (See, Ephesians 2:2 regarding "obeying the devil"); See, Romans 8:15 and 8:23, Ephesians 1:5, Galatians 4:5, relating to adoption from the bad dad that damns).

252. Unjust leaders teach people to reflect the image of Satan, called the "lawless one" by wrongly teaching everyone is for themselves, their own, without laws teaching people to care about (love) others. (Citing, 2 Thessalonians 2:8).

253. Just laws teach people to care about one another by correcting folks in court when they harm others to serve greed.

254. Laws are a tool judges and lawyers may use for good or evil, for justice or injustice, for love of humanity or for the love of money, a.k.a. greed.

255. I think of judges like Judge Clark, of the Court of Common Pleas, as super heroes, eternal life savers, because he corrects people and never condemns them. Like a loving father I heard him scold a defendant saying " I know you can make better choices. I am disappointed. You

know better." Judge Clark encourages faith, not despair, hope, not discouragement, building up with correction, not tearing down with condemnation. He saves lives and eternal lives and reflects what I think a super hero is.

256. I hope to draft laws to correct wrong doers in hopes to transform them into right doers, and to also heal victims of the wrongdoers misdeeds.

257. I desired to run for office back in 2018, because no legislator would fix the problems I presented to them, with the solutions I presented.

258. I was not able to unhardened the legislators' hearts to get them to care outside of themselves.

259. Specifically, I discovered misbehavior relating to out of state title companies who practiced law without a license, costing Delaware a lot of untaxed revenue and allegedly causing mistakes in the chain of title in real estate transfers, per other lawyers too.

260. I contacted various legislators for help on this issue.

261. Only one law maker seemed to be interested in helping me.

262. Sadly, he seemed to be interested in me personally. When I said no thank you regarding a personal relationship, he stopped helping me.

(See Exhibit 45).

263 I made it clear my request for legislative help was only a professional interest for a specific purpose, not a personal relationship.

264. I drafted an Article in the Coastal Point shedding light on this problem and offering a solution in the July 6, 2018 issue of the Coastal Point, called *Candidate discusses title companies' issues* . (See, Exhibit 46).

265. To date, no one has fixed the misbehavior relating to the out of state title companies practicing law without a license, thereby costing Delaware additional revenue that could be used to help the schools instead of increasing taxes and thereby forcing more Delawareans into foreclosure.

266. On an aside, I also contacted every single School District in this state and the General Assembly with a proposal to save the schools without increasing taxes. (See, Exhibit 47).

267. Only Senator Steve Smyk kindly responded with support for my proposal to save the schools. I was so touched by his compassion for the schools, especially since he is a Republican, and I am a Democrat. Note, this was before the parade where this Senator allowed me to ride in his vehicle instead of Representative Ron Gray's.

268. My belief in serving God by seeking justice, seeking what is right, unconditionally, even if it does not help me, admittedly makes me

different from other politicians. I am not easily manipulated by money, power or fear.

269. I have a fire in my belly to drive out darkness with light, injustice with justice, hate with love, ignorance with truth, and death with life.

270. That fire will not die should someone else gain the seat in 2020.

271. So, I seek a waiver from the Defendants in future elections as applied to me too.

272. I have never met anyone else who believes the same as I. So, I doubt anyone else will reject, money, volunteers, or signatures. Thus, I am seeking a waiver from Defendants, for a future election, limited to me, as a class of one, under the Equal Protections Clause, as well.

**COUNT I DEFENDANTS VIOLATE THE EQUAL PROTECTIONS
CLAUSE AS APPLIED TO MEGHAN KELLY'S
FREEDOM OF RELIGION**

273. Meghan Kelly repeats and incorporates by reference all the above paragraphs and all the below paragraphs, as though set forth herein in the first instance.

274. The Fourteenth Amendment prohibits states from depriving any person of life, liberty, or property without due process and **equal protections of the law**. (emphasis intended).

275. Any state law that conflicts with the Constitution under the equal protections clause, as applied, is preempted, unenforceable and unlawful to so apply.

276. Defendants deprive me of **equal protections of the law** by the unconstitutional condition precedent as applied to me, in this class of one, by requiring that I condition my right to the free exercise of my religion or the surrender of my right to seek office. (emphasis intended).

277. The application of the filing fee and or signature requirements clearly under 15 Del.C. § 3103, violate my unique religious beliefs in this class of one.

278. The Defendants refuse to remove, waive, or exempt me from the requirements under 15 Del.C. § 3103 that conflict with my religion, thereby essentially punishing me for my belief in Jesus Christ by denying the benefit of the ability to run for office without violating my religion.

279. Defendants unlawfully discriminate against me by persecuting me based on my religious beliefs in Jesus Christ by requiring I disobey Jesus

Christ to qualify to run for office as a Democrat in the US House of Representatives in the upcoming election.

280. Defendants unconscionably require I sell my soul to Satan by disobeying Jesus for the opportunity to gain a seat in the US House of Representatives by mandating adherence to 15 Del.C. § 3103.

281. I communicated my religious beliefs to Defendants.

282. Yet they refuse to comply with the equal protections clause by their stiff necked enforcement of 15 Del.C. § 3103, as applied to me.

283. My life, liberty and pursuit of happiness is protected under the constitution.

284. Life, liberty and pursuit of happiness are more precious than money and is afforded greater protection under our Constitution than mere money.

285. The Liberty interest to worship or not is according to the dictates of my own conscience, not the dictates of Defendants' convenience, profit and power or the dictates of the Party's convenience, profit and power, as they exercise activities that are so traditionally the exclusive prerogative of the state that they constitute state action even undertaken by a private individual or individual. Running an election for public office has been found to be such an exclusive public function. (See, Terry v Adams, 345 US

461, County political group whose candidate almost runs unopposed in primary and general election cannot discriminate.).

286. Defendants require I adhere to the dictates of their convenience, profit and power, rather than uphold my fundamental rights from Defendants' abuse and persecution of me based on my different religious belief by essentially preventing me from the ability to run for office because of my belief in Jesus Christ.

287. The Constitution limits Defendants' conduct and application of laws, to prevent such abuse. It does not give them a license to abuse or persecute.

288. The First Amendment provides "Congress shall make no law respecting an establishment of religion, or **prohibiting the free exercise thereof.**" (emphasis intended).

288. Defendants are punishing me, on the basis of my religious beliefs by denying benefits to, and, or imposing burdens upon me in order to be placed on the Democratic ballot in the state of Delaware, in violation of the free exercise clause, as applied to me, in this class of one.

289. Defendants violate my First Amendment right to the free exercise of my religion, applicable to Defendants by the Fourteenth Amendment, in that Defendants condition my right to the free exercise of

my religion or the surrender of her right to seek office, by unlawful application of 15 Del.C. § 3103.

290. Defendants unlawfully discriminate against me based on my religious beliefs in Jesus Christ by requiring I disobey Jesus Christ to qualify to run for office as a Democrat in the US House of Representatives in the upcoming election.

COUNT II DEFENDANTS VIOLATE THE EQUAL PROTECTIONS CLAUSE AS APPLIED TO MEGHAN KELLY'S FREEDOM OF SPEECH

291. Meghan Kelly repeats and incorporates by reference all the above paragraphs and all of the below paragraphs, as though set forth herein in the first instance.

292. Defendants' forced payment of filing fee and/or signature collection requirement(s) pursuant to 15 Del.C. § 3103, is requiring forced speech repugnant to my belief in Jesus Christ.

293. Such forced speech requires I disobey Jesus.

294. Freedom of speech includes freedom not to speak. (See, West Virginia State Board of Education v Barnette, 319 U.S. 624 (1943), The government cannot require people to salute the flag or display other measures with which they disagree.); (Also see, Wooley v Maynard, 430 US 705 (1977), A motorist could not be punished for blocking a portion of

his license plate that conflicted with his beliefs.); (Also see, *Tinker v Des Moines Independent Community School District*, 393 U.S. 503 (1969), This extends to symbolic acts such as wearing arm bands to protest the war. Students could not be forced to remove their bracelets to essentially feign support for something they opposed.).

295. The Defendants by requiring I compromise Jesus Christ's teachings, in order to adhere to a mere regulatory measure, 15 Del.C. § 3103, thereby require I **communicate** a message I believe leads those I hope to serve to harm and hell, or relinquish my right to run for office, violate my freedom of speech.

296. The Filing fee is not benefiting me and I believe it harms those I hope to serve. (Distinguish from cases where the government may require a fee for a program that benefits the person such as Board of Regents University of Wisconsin v Southworth, 529 U.S. 217 (2000).).

297. The Defendant requires I pay a fee for the purpose of the fee, in part, to subsidize speech that I finds offensive, in violation of my freedom of speech applicable to the Defendants under the First and Fourteenth Amendments.

298. None of the filing fee, Defendants require to be paid to the Party, benefits me personally.

299. In fact, I believe the filing fee will be used by Defendants to fund speech to harm me and others by misleading those I seek to serve to harm and hell by buying candidates to serve the few personal desires of a few powerful members Democrats, the Party. I believe that any and all such spending teaches people to violate Jesus Christ's teachings under the facade of good.

300. Defendants deprive me of **equal protections of the law** by an unconstitutional condition precedent as applied to me, in this class of one, which requires that I condition my right to the free speech or the surrender of my right to seek office.

**COUNT III DEFENDANTS VIOLATE THE EQUAL PROTECTIONS
CLAUSE AS APPLIED TO MEGHAN KELLY'S
FREEDOM OF ASSOCIATION**

301. Meghan Kelly repeats and incorporates by reference all the above paragraphs, and all of the below paragraphs, as though set forth herein in the first instance.

302. Defendants violate my First Amendment right to the free exercise of my affiliation, and/or right to run for office made applicable to the states by the Fourteenth Amendment, in that Defendants condition my right to the free exercise of her religion or the surrender of her right to seek

office with the blessing of the Party and Party Chair, by unlawful application of 15 Del.C. § 3103

303. I am a Democrat, in part, because they support and safeguard for laws that teach respect for all people regardless of religion, gender, age, race, origin or place of origin.

304. The Defendants, the Party and the Party Chair violate what the Democrats stand for by their refusal to grant me a waiver, exempting me from the filing fee and or signature requirements, under 15 Del.C. § 3103, although the Party and Party Chair are empowered to do so, and in this case required to so as not to violate my belief in Jesus Christ under the equal protections clause.

305. The Defendants have no compelling interests in requiring the signature requirement or filing fee be paid under the statute, other than their corrupt use of the money to serve their own power and profit.

306. The Democratic party is the party of inclusion and diversity, where the members respect the diverse views of others.

307. The Party and the Party Chair's determination does not reflect the beliefs of all Democrats, including my own.

308. I should not be forced to conform my speech to the dictates of a few, the Party, and the Party Chair, to associate as a Democrat, in order to be placed on the ballot, by supporting speech I find offensive.

309. Defendants deprive me of equal protections of the law by an unconstitutional condition precedent as applied to me, in this class of one, which requires that I condition my right to the freedom to associate as a democrat by complying with the Party's and the Party Chairs requirements under 15 Del.C. § 3103, or the surrender of my right to seek office.

310. In addition to or in the alternative of, Defendants deprive me of the equal protections of law, in that Defendants by enforcement of 15 Del.C. § 3103, conditioned my right to seek office to conform to the bartered, bought, biased profit and power of the few powerful Democrats in the Party, instead of respecting the diversity of those within the Democratic party, by in this case, respecting my diverse beliefs as a loyal lifelong Democrat, to the party, not the few people in power in this party or their ever changing positions.

**COUNT IV DEFENDANTS VIOLATE THE EQUAL PROTECTIONS
CLAUSE AS APPLIED TO MEGHAN KELLY'S
FREEDOM TO RUN FOR OFFICE**

310. Meghan Kelly repeats and incorporates by reference all the above paragraphs and all of the below paragraphs, as though set forth herein in the first instance.

311. By refusing to place Meghan Kelly on the Democratic ballot for the US House of Representatives, without conditioning such right by eliminating one of her other fundamental rights, the citizens will be denied a choice. That injury is irreparable.

312. While, the Supreme Court has found that the interest of running an efficient election supports a requirement that candidates obtain a reasonable number of signatures to get on the ballot, that does not take into account the fact gathering signatures violates my personal belief in Jesus Christ, so as to violate my freedom of religion under the First and 14th Amendments, as applied to me. *Norman v Reed*, 502 US 279 (1992).

313. The vote is the only non-corrupt form to show support for candidates running for office, and must be protected in general, and specifically in this case from the corruption relating to bartering for signatures or buying of support to gain the mere opportunity to serve the public in office.

314. Defendants violate my First Amendment rights, applicable to Defendants, by the Fourteenth Amendment, in that Defendants condition my

right to right to seek office, on the surrender of my free exercise of my religion, speech, and or affiliation., with no least restrictive alternatives as applied to me.

315. Meghan Kelly, a person, a class of a person of one, of a different unique religious belief should not be forced to choose between the exercise of my Constitutionally protected rights or the relinquishment of the right to run for office without violating such fundamental rights protected under the Constitution.

316. The right to vote, and to run for office without conditioning such right on eliminating another fundamental right, must be protected, against Defendants unlawful application as applied to me.

317. The Defendants and the state have less of an interest in governing party activities than in governing elections in general. See, *Eu v San Francisco County Democratic Committee*, 489 US 214 (1989).

318. The Defendants do not have a compelling reason to enforce 15 Del.C. § 3103, against me, in this class of one, so as to violate my freedom of religion, association, religion, and related rights.

319. The Defendants do not leave alternative choices less burdensome to my freedom religion, association, religion, and related rights.

320. Defendants enforcement of 15 Del.C. § 3103 against Meghan Kelly is not necessary for an important or compelling interest.

PRAYER FOR RELIEF

WHEREFORE, Meghan Kelly respectfully requests that this Honorable Court:

1. Enter an Order to permanently enjoin and restrain Defendants from enforcement of the filing fee and signature requirements under 15 Del.C. § 3103 against Plaintiff, so as not to violate Plaintiff's religious beliefs;
2. Enter an Order of a Writ of Mandamus requiring Defendants to exempt Plaintiff from the filing fee and signature requirements under 15 Del.C. § 3103 in future elections, so as not to violate Plaintiff's religious beliefs in future elections;
3. Enter an Order requiring Defendants to place Meghan Kelly's name on the Democratic Ballot for the U.S. House of Representatives for the upcoming 2020 primary for the State of Delaware, and if applicable, the general election;
4. Enter an Order requiring Defendants shall, at their earliest convenience add Meghan Kelly to the absentee ballots for the U.S. House of

Representatives for the State of Delaware, and, if applicable, shall mail such revised absentee ballots to all persons previously provided absentee ballots, is granted in this matter.

5. Enter an Order awarding Plaintiff costs, to the extent authorized by law and other such relief as the Court deems proper and just, if applicable.

Dated: 3/2/20

LAWYER

/s/Meghan Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
(772)332-9719
Pro Se
Bar Number 4968

I IFP
No. _____
Application No. 23A100

IN THE SUPREME COURT OF THE UNITED STATES

Meghan M. Kelly, Petitioner

v.

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

On Petition for Writ of Certiorari to the United States Court of Appeals for the Third Circuit
Case No 21-3198

**Appellant Plaintiff Meghan Kelly's Opening Brief
moving the US Supreme Court to vacate the Third Circuit's Orders dismissing the case
under Younger, denying recusals of Judge Scirica and Phipps and to remand the matter to
the Delaware District Court for consideration**

October 17, 2023

Respectfully submitted,

/s/Meghan Kelly
Meghan Kelly, Pro se
Not acting as an Attorney
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US Bar 283696

QUESTIONS PRESENTED

I. This appeal requires the US Supreme Court to decide the question of whether judges may be disciplined or otherwise corrected within the purview of the Constitutional limits of 1. Case or controversy or 2. impeachment by allowing me to amend the complaint to sue the Delaware Supreme Court and its members to void Kelly v Trump, and the disciplinary matter based on violations of my procedural due process rights, and to seek relief for harm and Constitutional deprivations the judges caused or whether judges are above the Constitutional rule of law, or whether I, and parties or attorneys like me, may be retaliated against and disciplined for seeking to petition members of the Court to uphold and not violate the Constitutional and federal law.

II. This case presents a unique important Constitutional question as to whether a disciplinary proceeding brought to punish petitions against the government, in violation of the US Amend I right to petition, and right to speech, on subject matter grounds, and the Equal Protections Clause is subject to voidability. Defendants seek to discipline Colleague Abbott for petitioning against the County and Courts. Are the courts above the law, or will this Court rule judges may be corrected within the purview of the Constitutional limits 1. Cases and controversies and impeachment, without vindictive retribution for correction.

III. Whether the evidence outlined on the record below concerning both Kelly v Trump and the DE Disciplinary show a high probability of procedural due process violations so great that I should be permitted to argue before the trial Court the Delaware District Court subject matter jurisdiction is void or voidable, especially since the statute of limitations would be tolled for claims relating to Kelly v Trump and for retaliation in response to my exercise of the 1st Amendment right to petition for exemption for bar dues.

IV. Whether the Court committed reversible error in dismissing my complaint given Defendants indicate my religious beliefs and citations to the Bible contained in my speech in my petitions to alleviate a government substantial burden upon my religious exercise by Trump's establishment of government religion is in issue, as Defendants' reason for interfering with in an attempt to cause me to forgo Kelly v Trump and later after the conclusion of my Religious Freedom Restoration Act lawsuit Kelly v Trump, and after the filing of Kelly v Swartz, in bringing the disability proceeding in violation of my 1st Amendment rights to petition, speech, religious belief and exercise of belief applicable to the state pursuant to the 14th Amendment, which claims I may only be bring in the federal court for damages and nominal damages, given the State forum before the Board has no jurisdiction to grant monetary relief or nominal relief for the State's Constitutional, state and federal violations, and since it is highly probable the State DE Supreme Court incited the interference especially since the DE Supreme Court concealed evidence in my favor during Kelly v Trump and fired two material witnesses, two court staff to prevent evidence in my favor during the disability proceeding while denying my right to call them as witnesses.

V. Whether the Court abused its discretion for dismissing my initial complaint under Younger arising from Defendants, the Delaware Supreme Court and the arms of the Court's interference in my RFRA law suit against former President Donald J. Trump made with the intent to intimidate me 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 and my petitions to correct and stop Court misconduct in light of the admitted reason for discipline was the Defendants found my religious beliefs in the bible and Jesus incomprehensible, when I sued Trump to alleviate a substantial burden upon my exercise of religious belief from the burden he

caused by the establishment of government religious belief in a course of conduct not limited to executive orders 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 that give churches money to perform government business under the lie of charity and another executive order E.O. 13798 which allows churches to take parishioner's donations to support or give the backing of government candidates or parties to give the blasphemous backing that God backed Trump which incited violence or threats of violence against me based on my apparent rejection of Trump religious belief.

VI. Whether the Court erred in dismissing my claims against Defendants for retaliation to prevent the initiation of an unlawful proceeding brought in bad faith to cover up Court misconduct where Defendants unconstitutionally sought to and did place my license to practice law on inactive disabled preventing me from buying and selling as a lawyer in violation of my 1st Amendment rights applicable to Defendants pursuant to the 14th Amendment based on disdain for my private exercise of the fundamental rights to petition, to religious beliefs contained in my protected speech, contained in my petition, essentially conditioning the elimination of fundamental rights for the active license to practice law since they find my religious beliefs repugnant or do not understand them. Basically can a Court place an attorney on inactive disability because they find their religious beliefs illogical or repugnant even if they are genuinely held.

VII. Whether the Court erred in dismissing the case under Younger given the numerous claims the Board whose subject matter jurisdiction under Rule 5 is limited to attorney

discipline could not address, including but not limited to claims for damages, nominal damages and equitable relief for violations of 42 USC §§ 1983, 1985, 1988, and harm to my reputation, claims for emotional distress, defamation, loss of employment opportunities, or other economic harm and for 1st Amendment rights to private petition, religious belief, speech, association and exercise of religious belief applicable to Defendants via the 14th, compelled violations of my religious belief, retaliation for the exercise of fundamental rights including but not limited to the right to petition, 5th Amendment right against self-incrimination by compelled incrimination required by the disciplinary rules, Constitutional arguments regarding a number of State Disciplinary rules, Constitutional arguments against the disciplinary proceeding, and by extension Constitutional arguments against federal judiciary disciplinary or disability proceedings and rules and the absence of life time appointments during good behavior for District and Appellate Court judges, Constitutional arguments to limit discipline or correction of Judges, including United States Supreme Court members to the purview of Constitutional limits of 1) cases and controversies and 2) impeachment by asking the court to find the US Supreme Court may not violate my 5th Amendment right as a party of one to Equal protection by a partial forum biased towards the regulations or regulators even by self-regulation instead of the impartial application of the Constitution to the rule of law, and by finding judges are above the law and above cases and controversy by depriving me of a forum for redressability for harm caused by members of the DE Courts who may not be a judge in their own case, denying me access to the record of a case where I am the accused No 341 to cover up additional deprivations of my 14th Amendment right to be heard, sending Court of Common Pleas Judge Clark, DE-Lapp and Defendants to attack me during Kelly v Trump to cause me to forgo my petition, sealing evidence in my favor in Kelly v Trump to fix the outcome in Kelly v Trump and the

future disciplinary case, firing witnesses necessary to my defense, than preventing me the opportunity to call them to cover up the DE Supreme Courts misconduct, Court staff writing on a praecipe and instructing me to cross off local counsel's address to prevent service and misleading me to miss a filing deadline in Kelly v Trump, denial of access to the law library, violations of my 6th Amendment rights applicable to Defendants via the 14th Amendment to self-represent, 6th Amendment right to call and confront witnesses in the Disciplinary Case, ancillary claims of loss of employment opportunities but for the threats incurred during Kelly v Trump which ended talks with my previous employer to start work but for the state's attacks against me during Kelly v Trump and other economic harm, and harm to my reputation, violations of procedural due process, substantive due process and equal protection under the 14th Amendment based on religious-political-poverty animus in both Kelly v Trump and the Disciplinary matter, bad faith harassment in the form Defendant Patricia Swartz lying to me to cause me to expend additional money or the case to be thrown out before the Board, Defendants intimidating me by sending state agents to attack me or otherwise threaten me to cause me to forgo Kelly v Trump, and lack of notice, denial of opportunity to be heard, opportunity to prepare, perform discovery or call witnesses, and numerous other claims I reserve on the record.

VIII. Whether the Delaware District Court's Orders (DI. ("District-Court"), (DI 16-17, 30-31, 59-60 (collectively, "District-Order")), is now in error as a matter of law and as a matter of fact, in light of with the passage of time the state proceeding has concluded. So, there is no case to abstain from under the Younger abstention doctrine. So they case should be remanded to be heard on the substance of the complaint and motions

IX. Whether the District Court erred in applying Younger to dismiss my complaint and motions by overlooking I asked for damages and relief unavailable in the state forum.

Whether the Court should have granted a stay as opposed to dismissal

X. Whether the District Court erred in applying Younger to dismiss my case, complaint, and motions when I had no adequate opportunity to raise my federal claims or ancillary claims for damages, equitable relief and nominal relief in state court

XI. Whether the District Court erred in applying Younger when bad faith, harassment, or extraordinary circumstances have arisen in my case that make a Younger abstention inappropriate

XII. Whether the Court abused its discretion by denying leave to amend the Complaint, while applying the Younger abstention, when such amendments would certainly overcome a Younger abstention

XIII. Whether 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

XIV. Whether the court deprived me of the 5th Amendment right to a fair proceeding or violated 28 U.S. Code §§ 144 and 455, 29 CFR § 2200.68, or other applicable law by failing to recuse Judge Phipps given Defendants attacks against me are based on my petitions against Trump, Trump twice placed Phipp's on a list of nominees for US Supreme Court, and Trump will likely nominate Phipps' as Supreme Court justice should he be reelected and an opening occur considering the facts under objective standards, the probability of actual bias on the part of

the Judge Phipps against me and in favor of Trump and my opponents is too high to be constitutionally tolerable.

XV. Whether the court deprived me of the 5th Amendment right to a fair proceeding or violated 28 U.S. Code §§ 144 and 455, 29 CFR § 2200.68, or other applicable law by failing to recuse Judge Scirica given the conflict of interest Judge Scirica chairs the Committee on Judicial Conduct and Disability (“Judicial rules”). (DI 149). I made Constitutional arguments against the judicial rules, against regulating the US Supreme Court by a Code of Conduct, self-discipline or disciplinary rules, and made arguments against the State disciplinary rules and proceedings that mirror the rules Judge Scirica is charged to revise and approve.

XVI. Whether the US Supreme Court errs as a matter of law by recognizing the deception of appearance of justice instead of actual justice as an important state objection somehow more important than the Constitutional application of the impartial rule of law by the wicked partial selfish interest of the state’s own appearance, and if so whether this is not a legitimate reason for part of the statute or regulations of the judiciary under 28 U.S. Code §§ 144 and 455, 29 CFR § 2200.68, or otherwise. Since allowing partiality towards the state’s appearance in light of fickle fads and popularity by the mob more than truth and justice creates a biased partial unfair forum in violation of the 5th Amendment procedural due process safeguards and equal protections component.

XVII Whether the Court should extend Brady violations to the Courts who intentionally conceal evidence in favor of the accused to prejudice the accused case.

LIST OF PARTIES

All parties appear in the caption of the case on the cover page.

CASES DIRECTLY RELATING TO THIS CASE

Kelly v Swartz, et al, Delaware District Court No. 21-1490, and Third Circuit Court of Appeals Matter No 21-3198. US Supreme Court filings *Kelly v Swartz et al* 22A747, *Kelly v Swartz et al*. 22-6783, *Kelly v Swartz et al*. 23A100.

Kelly v Trump Chancery Court No. 2020-0809, Delaware Supreme Court No. 119-2021, US Supreme Court No. 22-5522

Kelly v Democrats Delaware Chancery Court No 2020-0157.

The Original disciplinary case in Delaware Supreme Court matter No. 22-58 and IMO Meghan Kelly Number 541 regarding to appointment of counsel where I was denied copies or access to the filed pleadings. US Supreme Court application 22A476 *Kelly v DE Office of Disciplinary Counsel*.

Reciprocal disciplinary case Eastern District of PA matter No 22-45, Third Circuit Court of Appeals No. 22-3372.

Reciprocal Disciplinary case I believe is stayed Delaware District Court No. 22-341.

Reciprocal Case in the Third Circuit Court of Appeals 22-8037. Reciprocal disciplinary case before the US Supreme Court *Kelly v Third Circuit Court of Appeals* No. 22-6584 and application No. 22A478.

PA Supreme Court No 2913 DD3, US Supreme Court filing *Kelly v Pennsylvania Office of Disciplinary Counsel* US Supreme Court Numbers 22A981, 22-7695

DC and the US Supreme Court have refrained from discipline, DC based on jurisdiction.

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A.	FACTS OF CASE.....	5-126
1.	1st Amendment establishment clause and Religious Freedom Restoration Act against former Donald J Trump where I sought to substitute current President Biden for which this case arises Kelly v Trump.....	5-10
2.	Unbeknownst to me at the time of the Delaware Supreme Court members' misconduct, Delaware Supreme Court in Collusion with Defendants secretly sealed 4 docket items in Kelly v Trump to conceal evidence in my favor without providing me notice or an opportunity to be heard to hide my petitions regarding the State's attacks against me to threaten me in order to cause me to forgo the case in violation of 42 Section 1985, my 1st Amendment rights to petition, religious belief, associate, speech, procedural due process, my right to be free from intentional infliction of emotional distress and Equal Protections	10
3.	Kelly asserted Constitutional arguments against attorney disciplinary rules, Board proceedings, Federal Judicial disciplinary and Disability proceedings, and regulations of the US Supreme Court by a Code of Conduct or otherwise that would compromise the members impartiality by partiality towards the rules sustaining their seats and instead of the impartial application of the Constitutional rule of law to uphold the exercise of 1st Amendment individual fundamental rights which do not conform to the courts or the majority's, including mine. US Amend I, V.....	10-14
4.	Timing, after Kelly v Trump concluded and the Civil rights proceeding was filed, and the subsequent Attorney Disciplinary proceeding started, and ended, I discovered the DE Supreme Court concealed evidence in my favor, DE Supreme Court Attorney Robinson signed off on terminated Court staff, including a witness I noticed the Defendants I sought to cross examine, and the DE Supreme Court sealed my petitions regarding the Sate's misconduct in Kelly v Trump to conceal evidence in my favor at the Nov 3, 2022 probable cause hearing, the civil rights case, Kelly v Trump and reciprocal cases.....	14-15
5.	On 4/26/22, prior to the District Court's Order dated 4/26/22 denying motion for reargument, Kelly informed the District Court of the State eliminating 2 witnesses, Kelly's desire to amend the complaint once as a matter of right to conform to the facts, additional legal claim	

and additional parties in a rolling motion when remanded back; assertions against Disciplinary Rules 13 and 14, and proof the Delaware Supreme Court caused the interference in a letter by the court to me copying Defendant agent of the Board dated 10/21/2020.....15

6 The State committed attacks against me during 2020-2021 to interfere with and cause me to forgo my case in Kelly v Trump, which included disparate treatment with religious political animus, court staff writing on praecipe dated 10/5/20, and directing me to cross off local counsel's address on praecipe to prevent service to local counsel, court staff misleading me to miss deadline for an order I did not know existed, sending Court of Common Pleas Judge Kenneth S. Clark to attack me in public at a grocery store demeaning my faith in Jesus not I money as God, and sending three threatening letters by the State to cause me to forgo Kelly v Trump prior to the US Supreme Court's denial of a writ.....15-20

7 ODC's letters threaten Kelly with punishment to compel her to violate her previously asserted 1st Amendment religious objection to healthcare, and mental healthcare and threaten actual punishment but for finding her religious beliefs in Jesus and citations to the Bible as a source of her religious beliefs in defense of her private beliefs proof of disability.....20-21

7 On 10/25/21, Kelly Filed this civil rights law suit for monetary damages and equitable relief for emotional distress, violations of procedural due process, Equal Protections claims, First Amendment violations of private rights to petition, religious belief, exercise of belief, speech and association, loss of employment opportunities, or other economic harm, harm to my reputation, witness tampering, procedural due process violations and in violation of 42 USC §§§ 1983, 1985, 1988.....21-23

8. Probable cause hearing occurred where the Defendants accessed the docket according to Lexis's November 4, 2021 date. It is a delayed date, with evidence in my favor sealed. The petition cites my religious beliefs and citations to the bible in Kelly v Trump to be the reason for the petition.....23

9. District Court Dismissed my Complaint under Younger. I filed a Motion for Reargument and Motion to Amend the Motion for reargument. I showed the DE Members participated in the State's attacks. Since, I had an appeal in Kelly v Trump to the US Supreme Court, I did not add the DE Supreme Court members initially because the writ of cert may be granted in Kelly v Trump, and the case remanded back to the Court. I alleged additional damages and claims. The State threatened to compel me to violate my asserted 1st and 6th Amendment asserted right to self-represent as a religious-exercise, which caused emotional distress so great a police made a wellness check. During check I told him I couldn't find the police report where I told the police people talked about shooting me. No report was made, despite the fact I told the police. It may have been a police officer from my former gym outside of his jurisdiction checking on my car because someone threw something at it.....23-36

10. District Court denied my amended motion for a reargument under Younger. I drafted 3 motions under FRCP R. 52(b), and 59 (e) for the Court to alter and amend the judgment of the Court in its December 22, 2021 order to (1) include the availability of new evidence not available previously available, and to later the order (2) to correct a clear error of law, (3) clear

error of fact, (4) and to prevent manifest injustice. I indicating my intent was cemented to add the Delaware Supreme court and the members in the 3rd Motion. I included including additional evidence and violations of my 1st, 6th and 14th Amendment rights including but not limited to lack of notice, vitiation of my opportunity to be heard, denial of an opportunity to perform discovery or call witnesses, emotional distress forming in the shingles, appointing counsel despite my objection, denial of a fair impartial proceeding, which are within the scope of the appeal I reserved in my motions for reargument.....36-52

11. I filed a Motion to Amend my Complaint was as a matter of right, but accidentally did not mail out the signature page. I moved the court to amend my complaint as a matter of right to conform the complaint to the facts of the case in a rolling Motion. DI 58, and continuously moved to add new evidence reserving my right.....52-59

12. DE made a finding of disability causing reciprocal suits. Kelly asserted a physical limitation under the ADA before the DE Supreme Court in the DE Disciplinary case and reserved the potential claim on the record below.....59-66

13. Judge Phipps' created an obstacle so great as to vitiate my access to the US Supreme Court to appeal the original disciplinary decision by denying my asserted right to fair access to other courts by denying my Motion to stay the proceeding pending the US Supreme Court's determination of the original disciplinary proceeding, and by instead expediting the hearing date before briefing was due.....66-72

14. During my proceeding the Appellate Court below, reciprocating courts, and the Defendant Delaware Supreme Court and staff punished me as to chill my First Amendment right to petition to correct the Court staff's docketing mistakes.....73-76

15. Defendants the Board and Disciplinary Counsel violated Rule 9 and Rule h of the disciplinary rules in additional ways by failing to provide documents 10 days in advance of any hearing date to me and preventing me from calling witnesses by allowing me to self-represent with fewer than the 10 days required to not only subpoena witnesses but to provide expected testimony of witnesses to opposing counsel preventing me asserted right to call and cross examine witnesses.....76-79

16. Kelly was denied access to the law library. Defendant Patricia Swartz in bad faith lied to cause needless expenses in an attempt to prevent my petition. Delaware Supreme Court refused to place my appeal on the record in full without fighting by taking additional steps to place them on the docket.....79-80

17. Denial of access to the records where I am a party to discern if I was denied the opportunity to be heard by failing to docket my motions.....80-83

18. Meghan Kelly's Religious beliefs.....83-92

19. Third Circuit denied Meghan Kelly motion to recuse Judge Phipps based on his partial interest in punishing me for suing Trump to secure a potential Supreme Court seat by Trump since he was a nominee for US Supreme Court and will likely be a nominee should

Trump get reelected and based on relationships with Duquesne since I petitioned the law school about rats in 2005.....92-97

20. Third Circuit denied Meghan Kelly motion to recuse Judge Scirica based on my pleadings against attorney disciplinary rules and regulations which mimic the rules he drafts, and regulations of the US Supreme Court and federal Courts by eliminating the rules he is the appointed chair on drafting to prevent US Supreme Court regulation, Constitutional arguments against.....97-105

21. Justice Alito denied 30 day extension required to draft this appeal prejudicing my ability to appeal. Kelly would consider retaining another attorney who got into trouble for doing the right thing so long as I do not go into debt which violates my religious beliefs.....105-108

B. SUMMARY OF APPLICATION OF FACTS ABOVE TO THE LAW PLUS
ADDITIONAL REBUTTAL OF THIRD CIRCUIT’S FINDINGS.....108-126

C. ARGUMENT.....126-187

1. The Delaware District Court’s Orders (DI. (“District-Court”), (DI 16-17, 30-31, 59-60 (collectively, “District-Order”)), is now in error as a matter of law and as a matter of fact, in light of with the passage of time the state proceeding has concluded. So, there is no case to abstain from under the Younger abstention doctrine. So they case should be remanded to be heard on the substance of the complaint and motions.....126-128

2. The Court erred in applying Younger to dismiss my complaint and motions by overlooking I asked for damages and relief unavailable in the state forum. Whether the Court should have granted a stay as opposed to dismissal.....129-142

3. The Court erred in applying Younger to dismiss my case, complaint, and motions when I had no adequate opportunity to raise my federal claims or ancillary claims for damages, equitable relief and nominal relief in state court.....142-146

4. The Court erred in applying Younger when bad faith, harassment, or extraordinary circumstances have arisen in my case that make a Younger abstention inappropriate.....146-148

5. The Court abused its discretion by denying leave to amend the Complaint, while applying the Younger abstention, when such amendments would certainly overcome a Younger abstention.....148-156

6. 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.....156-173

7. The court deprived me of the 5th Amendment right to a fair proceeding or violated 28 U.S. Code §§ 144 and 455, 29 CFR § 2200.68, or other applicable law by failing to recuse

Judge Phipps given Defendants attacks against me are based on my petitions against Trump, Trump twice placed Phipp’s on a list of nominees for US Supreme Court, and Trump will likely nominate Phipps’ as Supreme Court justice should he be reelected and an opening occur considering the facts under objective standards, the probability of actual bias on the part of the Judge Phipps against me and in favor of Trump and my opponents is too high to be constitutionally tolerable.....173-175

8. The court deprived me of the 5th Amendment right to a fair proceeding or violated 28 U.S. Code §§ 144 and 455, 29 CFR § 2200.68, or other applicable law by failing to recuse Judge Scirica given the conflict of interest Judge Scirica chairs the Committee on Judicial Conduct and Disability (“Judicial rules”). (DI 149). I made Constitutional arguments against the judicial rules, against regulating the US Supreme Court by a Code of Conduct, self-discipline or disciplinary rules, and made arguments against the State disciplinary rules and proceedings that mirror the rules Judge Scirica is charged to revise and approve.....175-184

9. Whether the US Supreme Court errs as a matter of law by recognizing the deception of appearance of justice instead of actual justice as an important state objection somehow more important than the Constitutional application of the impartial rule of law by the wicked partial selfish interest of the state’s own appearance, and if so whether this is not a legitimate reason for part of the statute or regulations of the judiciary under 28 U.S. Code §§ 144 and 455, 29 CFR § 2200.68, or otherwise. Since allowing partiality towards the state’s appearance in light of fickle fads and popularity by the mob more than truth and justice creates a biased partial unfair forum in violation of the 5th Amendment procedural due process safeguards and equal protections component.....184-187

VI. Conclusion.....187-190

APPENDIX

Appendix (hereinafter “App.”)

App 1-A CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED....1

App 1-B Petition Letter requesting an exemption for bar dues for all attorneys facing economic hardship dated **January 7, 2021**, which was denied...5, 6, 16, 17, 21, 22, 30, 96, 108, 118, 121, 141, 142, 123, 130, 131, 136, 137, 141, 142, 146, 149, 151, 183

App 1-C Petition in response to denial of January 7, 2021 petition, with a new petition letter dated **February 5, 2021** wherein I requested an exemption for bar dues for all attorneys...5, 6, 16, 108, 136, 137, 183

App 1-D Separate sheet affidavit accompanying Motion for permission to appeal in forma pauperis I supplied when I initially appealed the Delaware District Court decision to the Third Circuit Court of Appeals wherein I indicated Delaware Supreme Court incitement of attacks , against me to cause me to forgo my religious freedom restoration act lawsuit against former President Trump...5, 16, 108, 183

App 1-E CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED continued, additional Delaware Disciplinary rules.....1

App. A **June 30, 2023** Order and opinion dismissing the case...1

App. B April 20, 2023 Order and opinion dismissing the case.....1,

App. C June 22, 2023 Order denying the petition for a rehearing.....1, 108

App. D June 20, 2023 Order Denying 1. Motion to recuse Judge Scirica, 2. Motion for a caveat to recusal for judicial consideration of drafting laws to prevent non-lawyers and non-judges from practicing law or taking the place of people judges without government authority, and 3. Motion for a Second Caveat to Motion for this Court to recuse Judge Scirica to move him for judicial consideration of drafting laws to prevent judges from speaking engagements on behalf of political think tanks such as lobbyists at the Federalist Society.....1, 18

App. E **July 10, 2023** Order Denying En Banc request and Motion for Reconsideration of Order denying recusal of Scirica.....1

App. F March 15, 2023 Order denying recusal of Judge Phipps.....1

App. G January 6, 2023 Order granting an extension of time and denying of a stay.....1

App. H February 9, 2023 Order Denying a stay pending the US Supreme Court’s denial of Judge Phipps Jan 6, 2023 Order denying a stay.....1

App I District Court Order and opinion dated November 2021 dismissing my case under Younger.....1, 24

App. J	District Court Order and opinion dated December 22, 2021 dismissing my case under Younger.....	1
App. K	District Court Order and opinion dated April 26, 2021.....	1, 115
App L	Memorandum order dated 12/28/23.....	1
App. M	Order granting ECF Access and exemption to PACER fees, dated January 5, 2023.....	1,
Exhibit A	(DI 2) Initial Complaint Kelly v Trump Case No. 2020-0809, filed 9/22/2020...2, 5, 6, 8, 9, 16, 18, 19, 24-26, 60, 108, 115, 121	
A-4	<i>Kelly’s Motion to the Delaware Supreme Court to rein in its arms from unlawfully pressuring me to forgo or impede my case to protect my free exercise of religion</i> , and exhibits thereto, , including December 1, 2020 letter to Master Patricia Griffin of the Chancery Court regarding my belief I received disparate treatment by the court’s staff based on religious belief, political association or poverty; emails, Internal Exhibit, Oct 19, 2020 letter to Patricia Griffin regarding I am acting as a party not as an attorney, DE-Lapp threatening email, Internal Exhibit, letter dated May 21, 2020, (3DI 121-11, DI 4)...	5, 9, 10, 16, 18-19, 21, 27-30, 108, 131, 136, 171, 182
A-5	<i>Kelly’s motion for the Delaware Supreme Court to require the recusal of the Honorable Justice Collins J. Seitz</i> , and related exhibits thereto, proof of payment of bar dues, emails to Mark Vavala confirming he did not incite the investigation, Internal Exhibit Letter from the Court in response to my request for exemption of bar dues for all attorneys facing hardship, dated February 5, 2021; attachment relating my concerns relating to recent US Supreme Court cases I disagreed with. (3DI-121-12, DI 4)...	5, 9, 10, 16, 18-19, 21,27-30, 108, 131, 136, 171, 182
Exhibit B	First Page of letter by Defendants dated 8/23/2021, showing Defendants claim “several pleadings in the “Court of Chancery and the [Delaware] Supreme Court in connection with the lawsuit Kelly v Trump” where my religious beliefs are in issue as the source of the Defendants’ interference in Kelly v Trump...	5, 6, 18-19, 23, 60, 78-79, 108, 122, 132-137, 139, 182
Exhibit C	Page 7 of Defendant’s petition to the Board, dated 11/3/2021, initiating a disciplinary proceeding where they alleged the reason to discipline me is based on my references to the Bible in Kelly v Trump where my religious belief are in issue.....	5, 6, 18-19, 23, 60, 78-79, 122, 132-137, 139
Exhibit D	<i>Exhibits showing belief of danger based on partnerships between not only church and state but government backed and condoned foreign and private partners inciting private attacks based on perceived religious or political association or beliefs</i> , including Email to Bo at the Delaware Department of elections, forwarding an email to Jesse Chadderon at the democrat’s office where I was concerned about a neighbor threatening me for my sign because he previously threatened to ram my car if I park it on my parents side lot, and he allegedly threatened to use his gun should someone at the board of the development come onto his property to inspect it without	

authorization, pictures of substance thrown at my car, Police report concerning 2 bullets shot into the home of Greg Layton hitting the wall above the dining room table as he and his wife sat there but for his political beliefs incited by Trump-religion, some of my signs I created which caused outrage and attacks, excluding Impeach [Trump] Serve your country not your seat, excluding Impeach [Trump] No one is above the law, No one is below the law.; Exhibit 43 which includes

1. Coastal Point, Guest Column, Representative candidate says health is wealth, By Meghan Kelly, Esq., Candidate Delaware House of Representatives, 38th District,
2. Document, “Your Health is your Wealth You are Priceless. Not a price tag! Kelly seeks Federal Consideration of Health Care Proposal,
3. Meghan Kelly’s teaching certificate, which goes to credibility. I learned psychology and behavior theories like BF Skinner’s. I also am licensed to teach health so I know something about health.
4. Meghan Kelly’s redacted law school transcript to show she took a course Health Care Finance and the course Law and Medicine while attending Duquesne School of Law.
5. Meghan Kelly’s redacted undergraduate college transcript to show she took relevant courses related to
 - a. History of Western Medicine
 - b. Economics
 - c. Medieval Philosophy
 - d. Psychology courses
6. Evidence of surgery that requires I drink water, rest and eat so I do not faint or die due to dehydration when I have my period. I lose five pounds every month. This is still a challenge. I must assert my right to live because many people serve Satan by not wanting to be inconvenienced to care to adapt to safeguard my life, or the lives and health of others.).....5, 6, 8, 21, 23, 34,53, 60, 61, 63, 78-79

Appendix N July 12, 2021 letter from Kelly to the Delaware Supreme Court concerning Chancery Court staff Arline Simmons instructing me to cross of the Delaware Civil Process Clerk’s address to prevent service, and the praecipes thereto, attached praecipes with the crossed off civil process clerk’s address, dated October 12, 2020.....16, 122

App. 0 Chancery Court Staff wrote on praecipe confusing Court dated October 5, 2020, a court stamped Copy of the Oct 12, 2012 praecipe to local counsel with address crossed off.....16, 122

App P 11/6/20 letter to Master Patricia Griffin in Kelly v Trump...16, 122

App Q Letter to the Court regarding difficulty accessing documents. Delaware Supreme Court indicated Kelly v Trump documents were sealed without notice to me, not destroyed. The correction made by District Court on 10/27/21 were not yet made public. So, I could not see them until I was granted ECF access

Cont App Q Court Link docket of Kelly v Trump showing A-4 and A-5 were invisible not accessible and that the docket was last accessed 11/4/22, the date of the probably cause hearing without the sealed documents.

Cont. App. Q DE Supreme Court Docket where I point out DI 21 and 16 are missing. I discovered DI 40 and 41 were also missing...10, 14, 15, 122

App R Email from file and serve with graph confirming 4 items necessary to my defense in Kelly v Trump, the disciplinary proceeding, reciprocal proceedings and the civil rights case were secretly sealed by the DE Supreme Court without notice or opportunity for me to be heard with dates items were sealed and dates of any changes as of the email's date...10, 14, 15, 122

App S File and Serve Graph of sealed documents from file and serve in a readable format on one page...10, 14, 15, 122

App T Letter dated 4/26/22 filed before Order by Chief Judge Colms that same day wherein I assert constitutional violations regarding certain rules and regarding the proceeding, indicate my intent to move the court to amend the complaint once as a matter of right in a rolling motion, I also submit videos an additional information on the record that had arisen notably my discovery of two Court staff were fired to prevent their testimony in my favor to hide their whereabouts from me.

Continued ("Cont.") App T Table of contents to this April 26, 2022 letter, included are videos with this letter

Cont. App T Continued Email to ODC concerning stop interfering with my case Kelly v Trump, and forwarded emails to school staff. Also emails regarding Judge Smalls and Judge Slight showing place of origin animus telling me to go back to PA or calling me a Philadelphia lawyer as if place of origin denotes value or worth when everyone has rights even those born in PA like me. ...11, 13, 14, 15, 16, 57, 115, 118-119, 122, 125, 167, 176-184

App T-2 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 8/15/22.....11, 13, 15, 57, 62, 167, 176-184

App T-3 Respondent Meghan Kelly's Motion to 1. declare the Reporting Requirements unconstitutional, requiring by written rule I violate my 5th Amendment right not to testify against myself to the government in order that the government may have evidence to prosecute me, 2. Declare the Case and Controversy requirements are not met in the system of attorney self-regulation, dated 8/19/22.....11, 15, 57,

App T-4 Respondent Meghan M Kelly’s Motion for permission to use electronic filing, and waiver of paper copies before this Honorable Court, and an exemption from PACER costs to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, and compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights, dated 6/20/22.....11, 13, 15, 57, 167, 176-184

App T-5 Plaintiff’s 79th Affidavit, DI 194, dated September 7, 2023 regarding my gratitude when US Supreme Court staff talk to me including Danny Bickle, my concern Justice Kavanaugh appeared to encourage regulation of the US Supreme Court

AppT-5 Continued (“Cont”). Letter to the US Supreme Court members addressed to Chief Justice Roberts regarding Please refrain from addressing Senator Whitehouse’s publicized disciplinary complaint against Justice Alito as it interferes with my case and controversies as to deprive me of the opportunity to petition this court in two cases regarding the same issue

Cont. App T-5 Exhibits on an Agenda to Eliminate people in the law to eliminate the government that restrains entities from getting as much as they can for as little unrestrained from the just rule of law from oppressing, killing, stealing or destroying human life, liberty or health for the bottom line, including internal exhibits

- Obituary of Richard Goll, a Delaware attorney who was exploited by an out of state real estate company practicing law without a license
- Newspaper Article I drafted in the Coastal Point on a proposition on how to resolve the fact non attorneys are practicing law without a license
- Article by the Venus project *How can laws be eliminated* regarding a new system to replace governments after 2050
- Excerpts from the Book *Shaping the Fourth Industrial Revolution* By Klaus Schwabb, Founder of the World Economic Forum and Chairman with Nicolas Davis, Copywrite 2018, Published in the United States by Currency, an imprint of the Crown Publishing Group, a division of Penguin Random House LLC
- Excerpts from the Fourth Industrial Revolution by Klaus Schwabb
- Article by World Government Summit Could an AI ever replace a judge in court?, dated 2017
- Article Robot justice: China’s use of Internet courts By Tara Vasdani This article was originally published by The Lawyer’s Daily (<https://www.thelawyersdaily.ca/>), part of LexisNexis Canada Inc
- Excerpts from The Great Narrative for a Better Future, by Klaus Schwabb.....11, 13, 57, 167, 176-184

App U Letter dated April 13, 2022, DI 55 discussing new fact I was denied admission into the law library and other facts arising showing additional potential claims or injuries continuously arising. DI 55

Cont App U, Exhibit B 35 pages of pages of procedural history, attached. I Incorporate the other exhibits by reference....15, 142, 144, 163

App V **DI 51**, March 10, 2022 to Court regarding the Clerk confirmed the entire Court reviewed request for bar dues, Denied an opportunity to be heard on Motions dated, 12/18/21,

12/31/21, 1/15/21 and 1/31/22, denied an opportunity to be heard before it was too late and my rights were vitiated by denying notice, discovery, ability to call or cross examine hidden witnesses and a fair opportunity to present my defense , in the Board’s ruling it required loyalty to organization as opposed to the Constitutional rule of law which violates the superseding Constitutional rule of law...

App V Cont Exhibit A Board finding that required my loyalty to mere people and organizations preempt the Constitution and the rule of law as opposed the mark of the beast the lusts of those who commit human sacrifice of life and liberty for material gain, convenience, avoidance of cost, position, pride, power or profit.

App. V Cont. Exhibit B Order dated 1/11/22 Order denying my emergency appeal dated 1/12/22if the Board’s denial of my objection to notice, asserted rights to call witnesses, perform discovery, adequate opportunity to prepare to meet my accusers as I overcame the shingles, and a fair proceeding

App V Cont. Exhibit C Order dated 1/18/22 denying my appeal of the Board’s email order denying an extension of time to allow me to adequately prepare for the proceeding.

App V Cont. Exhibit D Email Order dated 1/10/22 I appealed to the DE Supreme Court on 1/12/22 which it rejected 1/18/22 holding

“The Board plans to move forward with the virtual hearing as scheduled...”

App. V Cont. Exhibit E Email where I asserted my right to a formal appealable order and other rights. The Board lied by granting an extension for a reason my motion did not without sufficient days the rule required to call witnesses 8, when more than 10 days is needed with postage assuming 3 and 10 days required to call witnesses. The original date was insufficient time to call witnesses in the sham proceeding against me too. There is no way I could have adhered to the required notice to call witnesses in the sham proceeding against me especially since the DE Supreme Court participated in hiding two witnesses by firing them from the Chancery Court.....15, 18, 53, 55, 79, 163

App W Letter to the Court regarding the emergency 2/14/22 TRO, Preliminary injunction and emergency motion and notice of new immediate danger of compelled violations of my religious beliefs, with an outline of the documents filed in the Delaware Disciplinary proceeding, excluding other exhibits dated March 30, 2022 by mistake, filed March 29, 2022. DI 53, with exhibit B thereto, not all of the exhibits showing the table of exhibits in the Disciplinary proceeding, including my ignored filed, but not returned or rejected motions which I do not believe were docketed in a case against me No 58. Clerk refused to provide docket items, or proof of materials on the record.....14, 15, 21

App X Plaintiff’s Motion for an urgent Emergency preliminary restraining order to be applied immediately, with a waiver of bond, to prevent immediate and irreparable injury by compelled violations of my religious beliefs, but for the exercise of religious beliefs, filed 2/14/22

App X Cont. Exhibit A Jan 18, 2022 request for an order in an appealable form, instead of an order in form evading opportunity for review

App X Cont. Exhibit B Jan. 11, 2022 request for a copy of the docket, the record to the person acting as clerk or administrator to the Board. My request was ignored,

App X Cont. Exhibit C Jan. 31, 2022, Email to the Board and Patricia Swartz requesting she please send the state's exhibits Patricia and the Board required due Jan. 31, overruling my objection to refer to the record

App X Cont. Exhibit D Jan 31, 2022, email requesting Exhibit names, and forwarded E-mail espousing facts and religious beliefs

App X Cont. Exhibit E Jan.31, 2022 email asking for exhibits in attachment form with name

App X Cont. Exhibit F Jan. 25, 2022, Respondent's Motion for Dismiss for lack of notice in the state forum

App X Cont. Exhibit G Jan. 31, 2022, RESPONDENTS MEGHAN KELLYS MOTION FOR A PROTECTIVE ORDER PREVENTING MENTAL EXAMINATION OF RESPONDENT AS A GOVERNMENT COMPELLED VIOLATIONS OF HER RELIGIOUS BELIEF IN JESUS CHRIST

App X Cont. Exhibit H Email dated January 1, 2022 concerning immediately noticed errors in transcript emailed to me on Jan 31, 2022

App X Cont. Exhibit I Email dated January 31, 2022 to Board and Patricia regarding serious errors of court reporter, space for faith, I got cancer for I got the answer, and other errors

Cont. App X Exhibit J Email to Board and Patricia regarding court reporting errors regarding hegemonic state, Not head demonic state, highly prejudicial inaccurate transcript of hearing

Cont. App X Exhibit K my filed corrections of the transcript via Letter and attachment of corrections, with reserve to file additional corrections

Cont. App X Exhibit L Resubmitted second petition to the Delaware Supreme Court regarding license filing dues, dated Feb 5, 2021, resubmitted Feb. 1, 2022

Cont. App X Exhibit M Feb. 1, 2022, Third request relating to attorney dues, # 14 Exhibit N, order granting third request relating to lawyer dues

Cont. App X Exhibit N Feb. 26, 2022 granted request for 2022 for me only.....14, 21, 53-55, 79

App. Y. Letter dated May 21, 2023 requesting the Clerk of Court to resubmit my application in Kelly v Swartz for an interim stay, dated 2/11/23 rejected by justice Alito in this case under No. 22-6783 and NO. 22 A 747 incorporated herein by reference.....14,

App Z (DI 188-9) Email to Clerk of DE Supreme Court Lisa Dolph dated January 10, 2023, wherein I request all the documents regarding appointed counsel despite my religious objection and objection on the 6th Amendment grounds. Lisa's response, she would not give documents to me to see show whether I was deprived of the right to petition to cover up more Supreme Court misconduct January 10, 2023.

App Z Continued (DI 115) Plaintiff Meghan Kelly's Tenth Affidavit, filed 2/15/23 regarding the Delaware Supreme Court denied me access to or a copy of the records in the case against me No 58 appointing counsel, depriving me of seeing whether my prior objections to appointed Counsel were not docketed as to deprive me of the opportunity to be heard in defense of my fundamental rights.

App. Z Cont. Exhibit A (DI-115-4) Email, dated January 11, 2023 to DE Supreme Court Clerk citing case law requesting the records and asserting the right to the pleadings used against me in No. 58 in appointing counsel.

App. Z Cont. Exhibit B (DI 115-5) Order dated December 30, 2021 Motion to self-represent in Case No 541, Board Number 115327-B DE Supreme Court No 58, fewer than two weeks before the hearing date with Court closed January 1, 2023.

App Z Cont. Exhibit C (DI 115-6) December 16, 2021 Email to Opposing counsel and US Attorney General David Weiss regarding my religious objections to appointed counsel

App Z Cont. Exhibit D (DI 115-7) Obituary for Dick Goll, Esq. pamphlets for when I ran for office in 2018.....115

App. AA (DI 209-2,3) Docket sheet for US Supreme Court matter Kelly v PA ODC, No. 7695 showing the US Supreme Court denied my petition on October 2, 2023

(DI 209-3) Meghan M. Kelly's Petition for a rehearing of this the US Supreme Court's Denial of Petition for a writ of certiorari to appeal a decision by the Supreme Court of PA, dated October 2, 2023

(DI 209-4) Petitioner Respondent Meghan Kelly's petition for writ of certiorari to appeal the Pennsylvania Supreme Court dated February 28, 2023, filed May 30, 2023.....14, 68-76

App. BB (DI 209-6, 7) US Supreme Court docket sheet for Kelly v US Court of Appeals for the Third Circuit, No. 22-6584, denied March 27, 2023

(DI 209-8) On Petition for Writ of Certiorari to the United States Court of Appeals for the Third Circuit, Case Number Case Number 22-8037, signed 1/12/23.....14, 68-76

App. CC (209-10-11) Docket sheet for US Supreme Court Kelly v Trump, No. 21-5522, petition denied 11/1/21

(209-12) Petition for writ of certiorari of the Delaware Supreme Court in Kelly v Trump.....14, 68-76

App. DD Motion to Reopen Case to Consider pleadings filed July 4, 2023 and July 5, 2023, Motion to Reopen the case to exercise the 1st Amendment right to petition under FRAP 40 Motions for reargument on denied motions and another potential motion, dated July 10, 2023

Internal Exhibits to App. DD Exhibit P Letter by US Supreme Court, dated 2/7/23, rejecting my petition as exceeding the page limit since I filed a motion to exceed the page limit prior to not simultaneously therewith

App DD Cont Proof I timely filed a petition of the original disciplinary case 2/3/23, but it was returned, with the new due date conflicting with my civil rights case. I do not have the paper, money or resources to fight it simultaneously.

App DD Cont. Cert pool confirmation the conference for my petition before judgment in this case would be too late to grant me relief rendering it moot, April 21, 2023.

App DD Cont. Docket Sheet in this Matter NO. 22-6783

Internal Exhibits to App. DD Exhibit Q Letter dated 8/24/22 to third circuit to correct a Court staff error that prejudices my case by filing documents from another matter, the reciprocal disciplinary matter onto this case.

Internal Exhibits to App. DD Exhibit R Respondent Meghan Kelly’s Motion 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, dated 8/24/22

Internal Exhibits to App. DD Exhibit S Petitioner Plaintiff Meghan Kelly’s Corrected Second Motion pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike 3DI 77 as misfiled to be rescanned in to the Correct Matter No. 22-8037, without lifting my motion for a stay, dated August 25, 2022

Internal Exhibits to App. DD Exhibit T Petitioner Plaintiff Meghan Kelly’s Motion pursuant to Rule 40 for a panel Reargument on Order Dated August 31, 2022, and move for a Judge, not the Clerk of the Court to render an order on this Motion for Reagument, and her Corrected Second Motion pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike 3DI 77 as misfiled to be rescanned in to the Correct Matter No. 22- 8037, without lifting my motion for a stay, and Motion to strike 3DI 77, and exhibits thereto, and related document, due to the fact I brought up mistakes or potential misconduct by the clerk’s office to correct, to preserve impartiality, dated August 30, 2022

Internal Exhibits to App. DD Docketed proof of postage to show the Clerk threatened me with sanctions based on a false allegation that I sent the document through the emergency email, when the proof of postage was on the record, the case manager and court had prior knowledge I was mailing the documents, and to cover up the mistake or misconduct in placing documents from another matter on this case. (Case: 21-3198 Document: 87-10 Page: 1 and Page 2 Date Filed: 08/30/2022)

Internal Exhibit to App. DD. Appellant Respondent Meghan Kelly’s Motion to Correct the Record, specifically District Court Docket Item, DI 12 under Rule 10 (e)(2)(c) and Rule 27, to show I sought to correct the record in the Eastern District Court case, and the Court through Judge Diamonds also too retaliated against me, dated May 27, 2023.

Internal Exhibit to App DD another person’s filings in my Eastern District of PA case, showing we need court staff to correct misfilings and we need to be able to assert our rights for am accurate record without retaliation, (Case 2:22-mc-00045-PD Document 12-45 (12-46)(12-47) Filed 10/18/22, with cert of word Court 22-45, DI 55, and also placed on 21-1490.....14, 68-76

(DI 77-3-DI 77-4) Respondent’s reply to ODC’s Corrected Response to Respondent’s Objections to the Report and Recommendation of the Board on Professional Responsibility, June 7, 2022.....14, 15, 65, 109-110, 118-119

(3DI 98) 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 ...14, 62, 115, 118-121

(3DI 199-1) Appellant Meghan Kelly’s Petition for a Panel Rehearing , June 3, 20214,.....14, 15, 62, 109-110, 118-119

(DI 20) Plaintiff's Motion for Reargument, filed 11/8/21, Delaware District Court No. 21-1490, and exhibits thereto...

(DI 20) Cont. Exhibit 1 ODC's Petition to Transfer Plaintiff to disability

(DI 20) Cont Exhibit 2 Email to Defendant Patricia Swartz, regarding, "I have no working phone, and my computer is going into repairs. My car broke down at Delmar last week, and I am going to need maintenance. So, I may not be reachable for a week or so. I have other religious objections to appointed counsel, as going into debt is against my religious beliefs. Please hold off on filing. I would like to talk with you concerning my religious objections to appointment of counsel, and would like to hear your concerns, even if you prefer to communicate via email. Instead, of wasting resources. I prefer we discuss matters directly, and resolve disputes and misunderstandings without litigation, in your proceeding against me, or at least reduce costs by unnecessary mailing...."

(DI 20) Cont. Exhibit 3 Oct 26, 2021 Email regarding calling Justice Seitz as a witness in civil rights law suit.

(DI 20) Cont Exhibit 4 Nov 6, 2021 Email to Defendant regarding it appeared Justice Traynor was seeking jury instruction in federal court for a lawsuit against me

(DI-20) Cont Exhibit 5 Pleading to expedite the case, filed Nov. 6, 2021

(DI 21) Plaintiff's Motion to Amend Plaintiff's Motion for reargument, and exhibits thereto, including Plaintiff's Amended Motion for Reargument filed 11/9/21...8, 12, 15, 21, 24, 29-30-36, 109-110, 115

(DI 21) Cont Exhibit 1 Proof of cert of mailing

(DI 21) Cont Exhibit 2. Email to Counsel concerning my computer needs repairs

(DI 21) Cont Exhibit 3 Email from Computer repair warranty confirming the computer is in repair

(DI 21) Cont Exhibit 4 Confirmation I could not file my attorney registration inactive since a disciplinary proceeding began

(DI 21) Cont Exhibit 5 Police report when my neighbor threatened me due to my signs

(DI 21) Cont Exhibit 6 Pictures of substance thrown on my vehicle.

(DI 21) Cont Exhibit 7 Plaintiff's Amended Complaint

(DI 21) Cont Exhibit 8 Blackline of changes from motion for reargument to Plaintiff's Amended Motion for reargument.....8, 14, 21, 29-30-36, 24, 109-110, 115

(DI 34) PLAINTIFF'S MOTION TO AMEND FINDINGS OF FACTS AND ALTER THE ORDER, DATED DECEMBER 22, 2021, BASED ON NEW FINDINGS OF FACT, TO PREVENT, CLEAR ERROR OF FACTS, CLEAR ERROR OF LAW, AND TO PREVENT MANIFEST INJUSTICE and internal exhibits, Table of contents and the following exhibits.....14, 37-42, 115

(DI 35) TABLE OF CONTENTS

(DI 35) Cont. EXHIBIT A First Page of Defendants letter to me dated, August 23, 2021, showing the reason for the law suit against me to retire my license was the Delaware Supreme Court pleadings too.

(DI 35) Cont. EXHIBIT B Pages of the Complaint relating to claims for damages for infliction of emotional distress

(DI 35) Cont. EXHIBIT B 2 Letter Dated December 1, 2021, regarding harassment by Defendants, regarding my Answers were sent with confirmation, and resent, and additional facts relating to the case

(Internal exhibits) Exhibit 1 return receipt confirmation, and receipt.

Exhibit 2 Electronic signature item was delivered

Exhibit 3 Email dated November 30, 2021, to Defendant regarding confirmation of Answers, and my religious objection to Ms. Miss and Mrs., Jesus teaches us not to use titles

Exhibit 4 Email dated November 28, 2021 responding to Defendant about physical delivery, not delivery through email.

Exhibit 5 Receipt and return receipt of the second set of answers I spent hours printing out, and paid postage, dated November 30, 2021

Exhibit 6 Email from Defendant indicating November 30, 2021 they received the answers, which is a lie, since I did not mail out the second set until this date, and the confirmation indicates it was delivered November 22, 2021

Exhibit 7 **November 6, 2020** to Master Patricia Griffin in the Delaware Chancery Court relating to *Kelly v Trump*, regarding the Court's staff booby trapped me and my concern about Trump inciting an insurrection as an excuse to kill his own people to stay in office under a national emergency, a civil war, with attached statutes regarding the President's authority to use force against his own people in an insurrection, and newspaper clips where force was used or allowed by President Trump, when might makes wrong, not right.

(Attached) (Exhibit A) 10 USCS Sections 252, 253, 254

(Exhibit B) Newspaper article, New York Times, *Armed Agents are allowed to oversee ballot-Counting venues*, by Katie Benner, 11/5/2020, Business Insider, *Federal officers sent to Portland by Trump teargassed protesters, despite being told to leave by the mayor and governor*, dated 7/17/2020

(DI 35) Cont. EXHIBIT C Email and letter from arm of the Delaware Supreme Court De-Lapp, threatening me for my petition to the Court for relief on attorney license dues.

(DI 35) Cont. EXHIBIT D First page of an Order by the Delaware Supreme Court dated July 7, 2021, in *Kelly v Trump* by Justice Vaughn, Traynor, and Montgomery-Reeves

(DI 35) Cont. EXHIBIT E Letter to the Court, dated November 23, 2021, regarding my intent to object on subject matter grounds, and reasons the Court does not have subject matter.

(DI 35) Cont. EXHIBIT F Letter to court, dated November 22, 2021, regarding my intent to object to appointment of counsel on religious grounds.

(DI 35) Cont. EXHIBIT G Letter Motion to the Board, dated **December 18, 2021**, regarding intent to object to appointed counsel, request to postpone hearing, request time for discovery and a determination on counsel

(DI 35) Cont. EXHIBIT H *Respondent Meghan Kelly'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*

(Internal Exhibits) Exhibit 1, the Delaware Supreme Court Order relating to Counsel, dated **December 13, 2021**

Exhibit 2, Letter from Appointed Counsel and Notice of a hearing dated **December 10, 2021**, received indirectly by email **December 17, 2021**

Exhibit 4 Email to appointed counsel after I declined forced representation concerning another idea for the court to entertain.

Attachment to Exhibit 4, Five Articles of Impeachment I proposed and contacted all 541 federal law makers about

Exhibit 5, the In Forma Pauperis which discussed the Delaware Supreme Court's behavior and the burden this petition has upon me from preventing me from rejoining my old law firm where I would be performing real estate settlements and using the company car. So, I could give the car my parents gave me back. My dad needs a car.

Exhibit 6 Email to Attorney Generals regarding DE Supreme Court concerns, and religious beliefs

Attachments to Exhibit 6, Exhibit 3, Email to the Delaware Supreme Court regarding forced violation by swearing in without honoring my request to affirm

Exhibit 4 Letter to family court regarding performing family law violates my religious beliefs

Exhibit 5 (Not included) regarding judicial partiality was not included though attached and cited in the Email of Exhibit 6. I included it in another exhibit to the Motion for rearmament, Exhibit 8.

Exhibit 6 My E-mail directed to Senator Carper regarding using words not weapons to defeat ISIS/ conduct the government performs by funding charities which funds ISIS/evil under the guise of good/charity to reward violence/ using education to prevent leaders from using government established religion for their own vanity.

Exhibit 8 Proposals sent to law makers to prevent oil drilling. Revelation 11:18 provides, there will be a time to "destroy all who have caused destruction on the earth."

Exhibit 2 My lawsuit against the democrats to allow me to run for office without violating my religious beliefs by forcing me to collect donations or signatures in violation of Matthew 6:1-4.

Exhibit 7 E-mail to Attorney Generals regarding Delaware Supreme Court partiality concerns, objection to counsel as compelled forced violations of my religious belief, and other concerns.

Exhibit 8 Letter to the Delaware Supreme Court, dated October 1, 2012, regarding Judicial partiality and religious beliefs regarding preventing partiality in the courts

Exhibit 9 Letter dated November 22, 2021 to DE Supreme Court providing notice of intent to object to appointed counsel

Exhibit 10 Communication to my former employer, as recent as August 6, 2021, before the August 23, 2021 threatening letter.

(DI 35) Cont. EXHIBIT I Letter to the state court, dated December 21, 2021, concerning I declined representation from counsel, per attached letter to appointed counsel, and requested the court honor my motion. For reconsideration of the order dated December 13, 2021 appointing counsel, despite my objection.

(DI 35) Cont. EXHIBIT J Letter to the Board of Professional Conduct of the state of Delaware and the Delaware Supreme Court, dated **December 29, 2021, two weeks from the hearing**, concerning the court's and board's determination of postponement of the hearing in the

interest of justice, and status of a determination of my 6th Amendment right to self-representation.

(DI 35) Cont. Internal Exhibits (Exhibit A) First Page of the Office of Disciplinary's April 23, 2021 letter indicating the Supreme Court's pleadings as a source of their concern.

(Exhibit A part 2) Page 2-3 of Defendants petition showing the reason why they bring the state law suit against me is for my religious beliefs, citing the bible as authority for my beliefs, and their inability to understand my beliefs in Jesus.

(Exhibit B) E-mail to Attorney Generals, dated December 16, 2021, showing my distress at appointment of counsel, in the form of tears, admissible present sense impression, putting planning to prevent an economic crash on the back burner.

(Exhibit C) November 23, 2021 letter to DE Supreme Court indicating I intend to object on subject matter grounds and why.

(Exhibit C part 2) Email to Attorney General, dated December 15, 2021, concerning PACER, and showing emotional distress, and the need to protect free exercise of religion from the forced worship of money by the state, and discussions of the planned, preventable, reversible economic crash.

(Exhibit D) Certificate of Service of Respondent's Motion for Reconsideration of Order Dated December 13, 2021, appointing counsel despite notice of my intent to object, and objection of improper service of the board's notice of a hearing, dated **December 21, 2021**, (This shows I gave the board a copy a day after I served opposing counsel and the Court)

(Exhibit E) Email to Defendant, dated **November 4, 2021**, objecting to improper service of the August 23, 2021 letter and requiring paper mailed copies, also objecting to the appointment of counsel on religious grounds, and grounds of harassment and intentional infliction of emotional distress, providing notice to the Defendant appointment of counsel uniquely upsets me, and copying loved ones for my safety.

(Exhibit F) Email, dated **December 22, 2021**, to Defendant opposing appointed counsel

(Exhibit G) E-mail dated **December 21, 2021**, to the Court, Board and Defendant, indicating I did not accept representation from appointed counsel, and requested a docket, and an attachment of the

December 21, 2021 letter objecting to counsel, attached letter to Counsel declining representation, **dated December 20, 2021**

(Exhibit H) Email dated, **December 22, 2021**, E-mail to court about representation forwarding my email to counsel showing I fired him.

(Exhibit I) E-mail dated, **December 27, 2021**, to the court regarding concern not all documents were filed with the court, and attached docket.

(Exhibit J) E-mail dated, **December 28, 2021** to the Court, indicating appointed counsel did not have the documents I filed, and the Court did not send him all of the documents I sent, which may be needed in case of an appeal.

(Exhibit K) E-mail dated, **December 23, 2021**, to the Court regarding my religious oppositions to expert examinations, and conformation of receipt of filings, with attached filings for the Monday **December 20, 2021** Motion filed with the court and board.

(DI 35) Cont. EXHIBIT K Email, dated **Jan. 6, 2022, one week from the hearing**, I sent to the Board of Professional Conduct of the state of Delaware and opposing counsel to check on the status of my motion to postpone the hearing scheduled Jan. 13, 2022.....14, 37-42, 115

(DI 39) PLAINTIFF’S SECOND ADDITIONAL MOTION PURSUANT TO FRCP R. 52(b), 59(e) and 60(b)(1)(2)(6) TO AMEND FINDINGS OF FACTS AND ALTER THE ORDER, DATED DECEMBER 22, 2021, BASED ON NEW FINDINGS OF FACT, TO PREVENT, CLEAR ERROR OF FACTS, CLEAR ERROR OF LAW, AND TO PREVENT MANIFEST INJUSTICE and exhibits thereto, including table of contents, and the following exhibits

(DI 39) Cont. Table of Contents

(DI 39) Cont. EXHIBIT 1ST A, Letter of investigation by arm of state court, dated May 24, 2021

(DI 39) Cont. EXHIBIT A, E-mail to Defendant regarding my religious beliefs, and world economic forum founder’s plan as outlined in the two books The Fourth Industrial Revolution “to entice people through temptations to make 47 percent of Americans unemployed, to use the unemployed by labeling them mentally disabled, for mad science to teach the lie the mind can be controlled through robotics and medicine.”

(DI 39) Cont. EXHIBIT B Letter Motion, Dated December 18, 2021 to Board, DE Supreme Court and Defendant regarding discovery, reconsideration of counsel, and postponement of hearing due 1. to ineffective service, until after a final determination is made on counsel, and 3. Until discovery is complete, and the Receipt and postal confirmation Board and ODC received the December 18, 2022 filing on December 21, 2022

(DI 39) Cont. EXHIBIT C Respondent’s Objection to and Motion to enjoin expert observation and analysis of Respondent at hearings and in discovery; notice she will move for a protective order during the discovery stage, and requests to prevent costs as going into Debt is against her religious beliefs, and

Memorandum of Law in Support and Respondent’s Objection to and Motion to enjoin expert observation and analysis of Respondent at hearings and in discovery; notice she will move for a protective order during the discovery stage, and requests to prevent costs as going into Debt is against her religious beliefs

(DI 39) Cont. EXHIBIT D Respondent Meghan M. Kelly’s Emergency Objections and Emergency Motion filed with both the Board of Professional Responsibility for the Supreme Court of Delaware, and the Delaware Supreme Court, simultaneously, to postpone the hearing against her to prevent manifest injustice to afford her an opportunity to perform discovery, potentially call witnesses and prepare a defense for the state’s allegedly illegally motivated petition against her for her exercise of fundamental rights, motivated by the state’s disdain for her religious political beliefs, dated January 11, 2022,

(DI 39) Cont. Exhibit A excluded since it is a District Court Doc.

(DI 39) Cont. Exhibit B includes internal exhibits, in one saved document

1. Email to Board and Patricia Swartz, dated Thursday, January 6, 2022, following up on motion to postpone the hearing one week from the date, to afford a full

and fair trial, including an opportunity to gather evidence, so as not to violate the substantive and procedural due process clause, and an opportunity to use the evidence to present motions, including a motion to dismiss based on subject matter grounds.

2. Email to the Board and Patricia, dated Monday, January 10, 2022, follow up on status of my request to postpone the hearing.

3. Email to the Board and Patricia, dated Friday, December 24, 2021, regarding following up on my request to postpone the hearing, and the outstanding issues relating to appointed counsel versus permission to represent myself, undecided by the Court. Notice of my intention to file a Motion objecting to an expert's attendance at the hearing as against my religious beliefs, and notice of my intent to file a protective order to protect myself from examinations from mental health and physical health experts on religious grounds.

4. Email notification the Board member is out until December 28, 2021, dated December 24, 2021.

5. Email from the Board dated January 10, 2022, indicating the Board plans to move forward with the virtual hearing as scheduled, despite my appeal based on improper notice, and the need to prepare to defend my case.

6. Email to the DE Supreme Court, Board and Patricia, dated January 6, 2022, regarding the federal government is helping me with the vulture attacks.

7. Accidental duplicate of Dec 24, 2021 email, at No. 3.

8. Email to Court, dated December 22, 2021, forwarded emails to appointed counsel, firing him, and copying to others to protect my safety, dated December 21 and 22, 2021.

9. Email to Court asking for the Board's number, December 22, 2021. I was only able to leave messages.

(DI 39) Cont. EXHIBIT E Respondent Meghan M. Kelly's **motion appealing** the Order of the Board on Professional Responsibility of the Supreme Court of the State of Delaware dated, January 11, 2022, granting postponement of the hearing for 8 days due to illness, not a reason identified in my motion to grant postponement to afford me opportunity to prepare a defense, perform discovery, research, file motions, be heard on outstanding motion(s) unaddressed by the Board, to defend my exercise of fundamental rights and to preserve my license to practice law, on the grounds the amount of time is not enough and a hearing date must be postponed until after a fair opportunity to build a defense is granted, and moves the court to suspend a hearing date until the parties and the Board determine a fair opportunity to perform discovery has been allowed so as not to violate the norms of a fair proceeding, displaying disparate treatment towards respondent based on her unique religious political beliefs, in violation of the Equal Protections clause applicable to her as a party of one, **dated January 12, 2022.**

(DI 39) Cont. **(Internal Exhibits) Exhibit A** Respondent Meghan M. Kelly's Emergency Objections and Emergency Motion filed with both the Board of Professional Responsibility for the Supreme Court of Delaware, and the Delaware Supreme Court, simultaneously, to postpone the hearing against her to prevent manifest injustice to afford her an opportunity to perform discovery, potentially call witnesses and prepare a defense

for the state's allegedly illegally motivated petition against her for her exercise of fundamental rights, motivated by the state's disdain for her religious political beliefs, dated January 11, 2022

(DI 39) Cont. Exhibit B The Delaware Supreme Court Order Denying my emergency objections and motion to postpone the hearing.

(DI 39) Cont. Exhibit C The Board Order granting a postponement of the hearing to the date January 21, 2021, "due to illness," a reason I did not request.

(DI 39) Cont. Exhibit D Email to Patricia Swartz, dated January 3, 2022, regarding I am not feeling well, took a covid tests, and negative, but believe I am developing the shingles.

(DI 39) Cont. Exhibit E Email to Board, Lisa at the Supreme Court and Patricia Swartz regarding still sick, problems with phone, and vulture issue at home, which may interfere with scheduling, also attached pictures of the vultures that chase me and peck at the glass windows, and do not go away when I yell at them.

(DI 39) Cont. Exhibit F Email from the Board dated January 10, 2022, responding to my most recent request on my motion to postpone the hearing indicating "The Board plans to move forward with the hearing as scheduled"

(DI 39) Cont. Exhibit G Email To the Board and Patricia, dated December 24, 2021, regarding

1. I received docket ending before December 21, 2021,
2. Told the Board I would send them my November 19, 2021 answers to the petition via email for ease,
3. Indicated the Board is aware of my request to postpone a hearing date so I may properly defend my exercise of Constitutionally protected activity from state retaliation, but for the exercise of fundamental rights, requiring the government to bear the burden of strict scrutiny.
4. I told the Defendants I intend to file a motion objecting to an expert's attendance at a hearing, as it is against my religious beliefs. I am a child of God, not a scientific object for observation and examination by health or mental health examiners who play God by seeking to mold people like me to scientifically conditioned and conformed dictates instead of protecting the individual's dictates of conscience. Experts deem those whose will does not bend with temptations to adhere to the communally accepted trendy molds as unfit. My God teaches me those who are conformed to the world do not have eternal life and will be unfit for heaven, should they not repent.
5. I also told the Defendants I will likely file a protective order to protect myself from examination from mental health or physical health experts on religious grounds, should petitioner seek an examination. My exercise of fundamental rights, including exercise of my religious beliefs, requires the state meet strict scrutiny, which it is not likely to meet.

(DI 39) Cont. Exhibit H Emails dated January 11, 2022, email from Patricia Swartz to Board and me, objecting to postponing the hearing, and my responses, including my right to believe differently than the majority, and my religious objections to healthcare.

(DI 39) Cont. Exhibit I Email January 11, 2022, my email responding to opposing counsel, providing religious objections to healthcare and my religious beliefs, my disagreement with many democrats on healthcare when I ran for office in 2018, and a sign healthcare that cares not healthcareless, your health is your wealth, as I was still under the weather.

(DI 39) Cont. Exhibit J January 4, 2022 email to Court, Board and Defendant regarding I wasn't feeling well. The covid test was negative, but looks like I developed shingles.

(DI 39) Cont. Exhibit K Email, dated January 5, 2022, relating to a broken phone through the federal government

(DI 39) Cont. Exhibit L Email dated December 31, 2022, to the Board of motion, *Respondent Meghan M. Kelly's objection to and motion to enjoin expert observation and analysis of respondent at hearings and discovery; notice she will move for a protective order during the discovery stage; and requests to prevent costs as going into debt is against her religious beliefs; Memorandum of law in support of this motion, certificate of service, postal receipt, table of contents of the exhibits, and exhibits thereto contained, dated December 31, 2021*

(DI 39) Cont. Exhibit M Emails January 12, 2022, regarding I was not making a new motion merely because I communicated with the Board and Defendant I desired time to afford a fair opportunity to prepare a defense.

(DI 39) Cont. Exhibit F Answer to petition, excluding exhibits.

(DI 39) Cont. Exhibit G *Respondent's more particularized motion to suspend the hearing, scheduled for January 21, 2022 to allow me opportunity to research and prepare a defense, requesting opportunity to draft requests for admission, interrogatories and subpoena opposing counsel, Patricia Swartz, as a necessary witness in her defense, and subpoena other necessary witnesses, including but not limited to, Chief Justice Collins J. Seitz, Judge Kenneth S. Clark, Jr., due to his admission he interrogated me based on my exercise of fundamental rights incited by the ODC, and Arline Simmons, to show unconstitutional motive for this petition, to allow, the accused, respondent an opportunity to defend herself on the defense illegality of proceeding, as applied to her, motivated by disdain by the state for her religious associated beliefs and exercise of fundamental rights, and lack of jurisdiction based on the Delaware Supreme Court's apparent participation in inciting this petition against respondent.*

(DI 39) Cont. (Internal Exhibits) Exhibit A Post Office Receipt, and certified mail receipt and confirmation the December 18, 2021 letter motion requesting opportunity to perform discovery and file motions to dismiss was received by the Board and ODC on December 21, 2021

(DI 39) Cont. Exhibit B Postal Receipt for December 29, 2021 letter to Court, Board and ODC, dated December 29, 2021

(DI 39) Cont. Exhibit C Emails to and from Patricia regarding moot motion

(DI 39) Cont. Exhibit D January 12, 2022 email correction to Motion filed January 12, 2022, the federal government is helping me with the vultures, forwarded email from the Federal government representative.

(DI 39) Cont. **Exhibit E** Email to and from federal government official relating to the fact there is no charge for federal assistance with elimination of vulture problem, so as not to violate my religious beliefs.

(DI 39) Cont. **Exhibit F** Email filing dated Thursday, January 13, 2022, motion to expedite motion to appeal with the Delaware Supreme Court.

(DI 39) Cont. App Q Health docs averring I require time in order not to harm my health or die, including medical exhibit...14, 42-48, 115

(DI 36) PLAINTIFF MEGHAN M. KELLY'S 3rd EMERGENCY MOTION
PURSUANT TO FRCP R. 52(b), 59 (e), 60(b)(1)(2)(6), and 65

(DI 36) Cont Exhibit A Postal Receipt

(DI 36) Cont Exhibit B Confirmation of receipt

(DI 36) Cont Exhibit B email confirming seek to cross examine Justice Seitz

(DI 36) Cont C Exhibit C Motions for time to perform discovery, call witnesses, prepare given less than 2 weeks was granted right to self-represent deemed frivolous request by State court in bad faith, showing the Court made a determination on my case without affording me an opportunity to be heard

(DI 36) Cont D Exhibit D Order denying appeal for time to perform discovery, call witnesses, prepare

(DI 36) Cont E Rehearing rescheduled for a reason I did not request with fewer days than the rules permit to call witnesses

(DI 36) Cont F Communication by Defendant Aug 23, 2023.....14, 48-52, 115-122

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The Great Narrative for a Better Future, by Klaus Schwabb.....See App. T-5

The Fourth Industrial Revolution, by Klaus Schwab, 2016 version, excluding additional pages of the 2017 updated version published by Portfolio Penguin, which may be found at https://www.academia.edu/38203483/The_Fourth_Industrial_Revolution_pdf?fbclid=IwAR1koMak7N-40mbSf9wSGt8XzdhAJgafnbmobfn70FB4nbqcafl_hsN-RnQ.....38, See App T-5

Shaping the Fourth Industrial Revolution By Klaus Schwabb, Founder of the World Economic Forum and Chairman with Nicolas Davis, Copywrite 2018, Published in the United States by Currency, an imprint of the Crown Publishing Group, a division of Penguin Random House LLC... See App. T-5

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**IN THE UNITED STATES SUPREME COURT APPEAL OF THE ORDERS
BELOW BY THIRD CIRCUIT COURT OF APPEALS**

The opinions and orders of the Third Circuit Court of Appeals to review the merits appears at Appendix (“App.”) A entered 6/30/23, App. B entered 4/20/23, App. C entered 6/22/23, App. D entered 6/20/23, App. E entered **7/10/23**, App F entered 3/15/23, App. G entered 1/6/23, App G and, App H entered 2/9/23. The opinions do not appear published.

Also attached, please find the District Court Orders the Third Circuit affirmed Order with a Memorandum opinion dated 11/2/21 at App. I, an Order with a Memorandum opinion dated 12/22/21 at App. J, an opinion and a Memorandum Order dated 4/26/22 at App. K., a memorandum order dated 12/28/23 at App L and an order granting ECF access and an exemption to PACER fees dated January 5, 2023 at App M.

I. ORDERS AND OPINIONS

The date on which the highest state court decided my case is 4/20/23. A copy of that decision appears at App. B. The Court denied a motion of reargument on 6/22/23. The date the court decided my motions relating to recusing Judge Scirica is 6/20/23. The court denied a motion for reargument on **7/10/23**.

II JURISDICTION

The jurisdiction of this Court is invoked under 28 U.S.C. § 1254 or in the alternative under 28 U.S.C. § 1253.

III CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

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

IV. STANDARD OF REVIEW

A. A court “has no discretion [and may not] dismiss [under Younger] 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. 14, 2021); ¹ *Deakins v. Monaghan*, 484 U.S. 193, 108 S.

¹ *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*, 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

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.”).

B. Pursuant to *Fed. R. Civ. P.* 15 (a)(1), and under other provisions of *Fed. R. Civ. P.* 15. I have an absolute right to “amend without leave where no answer has been filed.” *Citing, De La Cruz-Saddul v. Wayne State University, E.D.Mich.1980*, 482 F.Supp. 1388 (*Also see, Adams v. Quattlebaum, D.D.C.2004*, 219 F.R.D. 195 “Plaintiff enjoys absolute right to amend complaint once at any time prior to responsive pleading or granting of motion to dismiss.”)

C. Under *Fed. R. Civ. P.* 15(a)(2), “[L]eave sought should, as the rules require, be “freely given.” Of course, the grant or denial of an opportunity to amend is within the discretion of the District Court, but outright refusal to grant the leave without any justifying reason appearing for the denial is not an excuse of discretion and inconsistent with the spirit of the Federal Rules.” *Gianetti v. Cross*, No. 091416, at *16-17 (May 18, 2010).

D. “Recusal is required under the Fourteenth [or 5th] Amendment's due process clause [if] ‘objectively speaking, the probability of actual bias on the part of the judge or decisionmaker is too high to be constitutionally tolerable.’” *Citing, Rippo v. Baker*, 580 U.S. 285, 137 S. Ct. 905, 197 L. Ed. 2d 167 (2017). “When the objective risk of actual bias on the part of a judge rises to an unconstitutional level, the failure to recuse cannot be deemed harmless.” *Williams v. Pennsylvania*, 136 S. Ct. 1899, 1909-10 (2016)

E. A party seeking recusal under 28 U.S.C. § 455 need not show actual bias on the part of the court, only the possibility of bias. Under § 455(a), if a 'reasonable man, were he to

(8th Cir. 1998) (when § 1983 complaint seeking damages is subject to Younger abstention, federal action should be stayed rather than dismissed).

know all the circumstances, would harbor doubts about the judge's impartiality' under the applicable standard, then the judge must recuse.

F. Younger may apply but is not dispositive if there is an “(1) “an ongoing state judicial proceeding, which (2) implicates important state interests, and (3) . . . provide[s] an adequate opportunity to raise [federal] challenges.]. *Sprint Commc'ns, Inc. v. Jacobs*, 571 U.S. 69, 81 (2013).

F. Even if all of the above referenced factors apply [which I argue against] bad faith, harassment, the lack of an adequate state forum, or other extraordinary circumstance such as irreparable Constitutional injury precludes Younger from applying. “ *Middlesex Ethics Comm. v. Garden State Bar Assn*, 457 U.S. 423, 429 (1982).

G. A trial court abuses its discretion when it is highly probable there is clear error of law, clear error of fact or manifest injustice requiring an amendment or altering of an order. See for eg., *Magera v. Lincoln National Life Insurance Company*, CIVIL ACTION No. 3:08-CV-0565, at *4 (M.D. Pa. May 14, 2009) (. “A judgment may be altered or amended if the party seeking reconsideration establishes at least one of the following grounds: “(1) an intervening change in controlling law; (2) the availability of new evidence that was not available when the court granted the motion . . .; or (3) the need to correct a clear error of law or fact or to prevent manifest injustice.”)

H. The Standard of review for violations of my fundamental rights including but not limited to my First Amendment right to petition to defend my First Amendment right to religious belief, 1st Amendment right to exercise religious belief, first Amendment right to private speech contained in my petitions, 6th Amendment right to access to the record to pleadings in a case

against me in in the matter of Meghan Kelly 541, 6th Amendment right to self-represent, 14th Amendment right to notice, an opportunity to be heard on pleadings I suspect were not docketed in No 541, and 5 additional motions, and a fair opportunity to prepare and present my case, perform discovery, call witnesses, cross examine accusers, have evidence not intentionally hidden by the court by sealing my pleadings in Kelly v Trump and firing of witnesses, be free from the Delaware Supreme Court incited attacks against me to cause me to forgo my lawsuit in Kelly v Trump by sending its arms to send letters to threaten me and an outside judge Kenneth Clark to threaten me in a grocery store, to be free staff seeking to sabotage my case by misleading me to miss the filing time, writing on praecipe to cause confusion and directing me to cross off the address to local counsel to prevent service, against is strict scrutiny.

V STATEMENT OF THE CASE

A. FACTS OF CASE

1. 1st Amendment establishment clause and Religious Freedom Restoration Act against former Donald J Trump where I sought to substitute current President Biden for which this case arises Kelly v Trump

I am a Christian lawyer who was attacked by the state by the request of the Delaware Supreme Court members through its arms and agents to cause me to forgo my lawsuit against former President Donald J. Trump (“Trump”) to punish me for my exercise of the private 1st Amendment rights to petition, private-speech contained in the private-petitions, affiliation, private religious beliefs and exercise of religious beliefs and in retaliation for my 1/7/2021 and 2/5/2021 petitions to exempt bar dues for all attorneys facing economic hardship.²

² (Exhibits A, A-4, A-5, B, attached hereto and incorporated herein in its entirety). I incorporate all references in their entirety whether by Delaware District Court Docket Item Number (“DI”) or Third Circuit Docket Item (“3DI”). 3DI-121-11, 12; 3DI-126-9, 10, 11; See, US Amend I, XIV, also see, App 1-B, App. 1-C letters requesting exemption from bar dues, and App 1-D, the information sent to the Appellate below when I initially appealed showing the DE Supreme court incited Del-Lapp and the ODC to interfere with Kelly v Trump to cause me to forgo my case.

I filed a private Religious Freedom Restoration Act, 42 USCS § 2000bb (1-4) (“RFRA”) lawsuit *Kelly v Trump* in the Chancery, No. 2020-0809, Delaware Supreme Court, No. 119-2021, and the United States Supreme Court, No. 21-5522, as a private party to protect my private-First Amendment 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 Donald J. Trump and current President Joseph R. Biden from enforcing executive orders creating a union of government-religious entity partnerships, 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”).³

These executive orders allow money or support to be transferred between government agents and religious organizations to perform government business. I believe the money or support in the bought or bartered for, not free union of church and state, is one reason why religious-political attacks seemed to have increased in recent years, including government incited religious-political attacks against me. 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

³ See Exhibit A, (initial complaint in *Kelly v Trump*. Albeit, I petitioned on Trump’s E.O. 13798 granting churches the license to give candidates and parties parishioners’ donations, verbal support and church backing before I included arguments upon the horrific discover of the other orders in other petitions in the Delaware Courts. See US Supreme Court No 21-5522 on this court’s dockets)

bestowed to religious organizations, like churches in other countries, to perform government business under the guise of charity.

I believe Jesus teaches people commit lawlessness in the eyes of God for teaching business is charity, help, good or love because it drives out unconditional love from the hearts of men replaced with the love of money and material gain, or productivity extracted from others. Citing *Matthew* 6:1-4. Since Jesus teaches you cannot serve God and money as savior and God, and only those who do God's desires are saved from death, the misled go to hell should they not repent. *Matthew* 6:24. Jesus teaches those who worship by business are not welcome in his father's house. *John* 2:16

“The Establishment Clause prohibits government from establishing a religion in the sense of *sponsorship, financial support, or active involvement of the sovereign in religious activity.*” *Kalman v. Cortes*, 723 F. Supp. 2d 766, 769, (2010)

I reasonably believed the Executive Orders violated the establishment clause, especially Trump's E.O. 13798 which permits churches to back candidates and parties using the donations from parishioners to serve the political vanity of men which I believe is blasphemy by making man God's anointed instead of Jesus. I believe the executive orders also violates Jesus's teachings in *Matthew* 6:1-4, and 6:24, misleading people to hell under the guise of salvation, which caused me foreseeable emotional distress. I love people. I do not want them to be misled to harm or hell. See *Bible Isaiah* 9:16 (“For the leaders of this people cause them to err; and they that are led of them are destroyed [in the fires of hell on judgment day as too corrupt to live into eternity in heaven]”).

President Trump also incited religious-political persecution against people for their projected religious beliefs based on not supporting him in his formal government position, or his Republican party, or the religious organizations which supported his presidential candidacy, including me as a party of one, (as a Christian, Catholic, Democrat who exhibited opposition to Trump by drafting 5 proposed articles of impeachment which I contacted all 541 federal law makers to impeach on), substantially burdening my free exercise of religious belief, **by a course of conduct which I argue also establishes government-religion**, causing people to attack me, talk about shooting me, throw things at my vehicle, actually shooting two bullets in the home of Delawarean Greg Layton based on political beliefs, kill, harm or attack others based on religious or political belief substantially burdening my free exercise of religion, speech, and political-religious affiliation, as I outlined in Kelly v Trump to this Supreme Court at pages 23-25, including but not limited to:⁴

- “1. appointing a personal spiritual advisor, and alleged Christian leaders to advise the President, creating the religious backing and the appearance of Godly guidance supporting Defendant’s government authority;
2. holding up a Bible in front of a church for a photo op after people were gassed in response to their Constitutional exercise of affiliation and speech at a protest;
3. hypocritically claiming “Biden will hurt the Bible;
4. persecuting people who exercised their freedom to worship or not by the dictates of their own conscience, not government-religious commands, by demeaning those who omitted the word God in the pledge of the allegiance;
5. improperly sharing his alleged prayer to God, while acting under the color of the law;
6. creating the illusion there is a war on Christmas, by liberals like me;
7. repeating the government-religious belief that he may be the chosen one by God, contributing to the government-religious belief Trump is anointed by God;
8. moving the US embassy in Israel to Jerusalem for a religious group, Evangelicals;
9. sponsoring and inciting private persecution towards liberals by churches and its parishioners, by buying loyalty by barter or exchange, even by praise, for a little

⁴ Citing DI 4 and 3DI-121-6, pages 23-24; See Exhibit D regarding attacks too. Also see (DI 20) Plaintiff’s Motion for Reargument, filed 11/8/21, Delaware District Court No. 21-1490, and exhibits thereto, and (DI 21) Plaintiff’s Motion to Amend Plaintiff’s Motion for reargument, and exhibits thereto, including Plaintiff’s Amended Motion for Reargument filed 11/9/21, where I talked with a police man and discovered it was a mere gym-mate who looked at my car and the substance thrown on it. The police who talked with me about strangers talking about shooting me did not file a report.

something down the line, such as bailouts, or power to persuade politicians, at the cost of teaching some preachers and parishioners to persecute non-Trump supporting liberals like me, and including me;

10. tweeting fabrications making it appear democrats like me are attacking the church including the tweet. ‘DEMS WANT TO SHUT YOUR CHURCHES DOWN, PERMANENTLY. HOPE YOU SEE WHAT IS HAPPENING. VOTE NOW;’

11. signing another Executive Order, Ex. Or No. 13831, May 3, 2018, which increases the temptation for government employees, including the President, to back religions financially or otherwise, in hopes to receive their government backing and government support in return under E.O. 13798; and

12. using his son to glorify him as the savior of Christianity, when I believe Jesus the Christ is the savior under Christianity. Eric Trump said his “father ‘literally saved Christianity...there is a full war on faith on the other side, (meaning my democrat side). (Eric continued), ‘The Democrat Party, the far left, has become the party of atheists, and they want to attack Christianity”

In my amended Complaint I requested the DE-Chancery Court hold:

“1. Defendant [Trump] is permanently enjoined and restrained from forcing religious views or sponsoring religion, while employed as the President of the United States, so as not to substantially burden Plaintiff’s free exercise of religion.

2. Defendant [Trump] is permanently enjoined and restrained from persecuting those with diverse religious beliefs, based on such perceived religious beliefs, while acting as the President of the United States.

3. Declaratory relief in accordance to Chancery Court Rule 57 and 10 Del C Section 6501, declaring **federal government agents such as Trump, acting under the cloak of federal government authority, by employment, appearance, or agency or otherwise, hold more limited rights under the first Amendment, in order to uphold, not to chill, the Constitutional freedoms of those they are charged to serve.**” (Emphasis intended)

Members of the government, including Defendants, Delaware Supreme Court members and court staff members, and agents or arms (also referred herein as “State,” Court, “Defendants”) purposely interfered with *Kelly v Trump* to pressure me to forgo and to impede my case *Kelly v Trump*, which I specifically objected to, reserving the issues for appeal in violation of Due Process, the 1st and 14th Amendment in, *Appellant’s Motion for the Delaware Supreme Court to rein in its arms through its agents from unlawfully pressuring appellant to*

forgo or impede her case to protect her free exercise of religion by relief it deems just (“Motion 1”), dated 5/21/2021 reserving the issues for appeal in *Kelly v Trump*.⁵

2. Unbeknownst to me at the time of the Delaware Supreme Court members’ misconduct, Delaware Supreme Court in Collusion with Defendants secretly sealed 4 docket items in *Kelly v Trump* to conceal evidence in my favor without providing me notice or an opportunity to be heard to hide my petitions regarding the State’s attacks against me to threaten me in order to cause me to forgo the case in violation of 42 Section 1985, my 1st Amendment rights to petition, religious belief, associate, speech, procedural due process, my right to be free from intentional infliction of emotional distress and Equal Protections

The Delaware Supreme Court (“Court”) made no ruling on Motion 1 or on my arguments relating to a fair trial, First Amendment and Due Process violations in response to my arguments in either the Chancery Court or the Delaware Supreme Court pleadings.

The Delaware Supreme Court also did not address my Motion for the Delaware Supreme to require the recusal of the Honorable Chief Justice Collins J. Seitz, on 5/28/2021 (“Motion 2”), which provides additional evidence of government suppression of my free exercise of religion, by impeding, seeking to obstruct my right to seek a judicial remedy to freely exercise my religion, based on the established government-religion, association or poverty, reserving objections against the State.⁶

The Delaware Supreme Court through the Clerk’s and staff’s admission secretly sealed Motions 1 and 2 concealing evidence in my favor showing procedural due process during *Kelly v Trump*, without providing me notice and an opportunity to be heard by sealing my pleadings and sometime before the disciplinary proceeding terminated two witnesses in my favor. App. Q R S

3. Kelly asserted Constitutional arguments against attorney disciplinary rules, Board proceedings, Federal Judicial disciplinary and Disability proceedings, and regulations of the US Supreme Court by a Code of Conduct or otherwise that would

⁵ DI-4, Third Circuit Docket Item (“3DI”) 3DI- 157-3, A-4, A-5.

⁶ DI-4, 3DI-43-8, 3DI-43-9, 3DI-157-3, 3DI-157-4 Motion 1 and Motion 2 are attached hereto and incorporated herein as A-4, A-5.

compromise the members impartiality by partiality towards the rules sustaining their seats and instead of the impartial application of the Constitutional rule of law to uphold the exercise of 1st Amendment individual fundamental rights which do not conform to the courts or the majority's, including mine. US Amend I, V.

I alleged Constitutional arguments in the District Court against certain state disciplinary rules, the state disciplinary proceeding, federal attorney disciplinary rules, and the Rules for Judicial-Conduct and Judicial-Disability Proceedings. I also made Constitutional arguments against a code of ethics and disciplinary rules to regulate and control the United States Supreme Court. Any regulation of federal judges compromises the integrity of the court by making the US Supreme Court members and federal judges partial to regulators and regulations to preserve their partial interest in sustaining their seats instead of serving the people by the impartial Constitutional application of the rule of law in cases and controversies in violation of the public's right to a fair proceeding under the 5th Amendment, and my Constitutional interests I am in danger of losing as a party of one. Art III., US Amend V.⁷

I argued judges should only be disciplined within the purview of the Constitutional limits of 1. Cases and controversies or 2. Impeachment, as federal judicial Disciplinary proceedings violate the impartial rule of law by enticing no longer free and independent but controlled judges to the partial-selfish interests of sustaining their positions by threats of discipline instead of doing what is right by upholding the impartial rule of law.

I have unique religious beliefs against partiality in the courts and face harm based on 1. my religious beliefs and 2. Constitutional arguments concerning disciplinary proceedings and certain disciplinary rules on the record that may grant me standing to address the issues on

⁷ DI58, DI 77-79, DI 102, DI104, DI 123, 129, DI 130, DI-131, DI 132, DI 141, DI 145, DI 149, DI-152, DI-154, DI-155, DI 156, DI 158, DI 159, DI 161, DI 162, and more

remand below.⁸ In order for the Supreme Court to uphold the integrity of the courts they must uphold the preempting Constitutional rule of law and not allow the Courts to punish me and other people for asserting Constitutional rights when Courts violate them, make mistakes or commit grave misconduct to fix proceedings and conceal their own violations of the Constitutional rights. I averred we do not need regulations. We need justice where the Courts show judges are not above the rule of law and attorneys may petition the courts for judicial mistakes or misconduct without fear of reprisal but for exercising their 1st Amendment private right to petition to safeguard private Constitutional liberties. In order for the Court to uphold and I argue limit discipline of federal judges within the purview of the Constitutional limits of cases and controversies and 2. Impeachment, the Court must allow and not chill by punishing me as applied and other attorneys and parties for petitioning the courts to correct judicial mistakes or misconduct in cases and controversies as opposed to disciplinary cases without cases or controversies just fickle accusations by those who seek to control a no longer free, and fair judiciary when judges defer to professional disciplinary board's bias towards what I believe is the mark of lawlessness leading to certain damnation in the fires of hell, standardized conduct to

⁸ I have unique standing on religious grounds, not merely that I seek the Courts may only be disciplined within the purview of the Constitution's limit without waiver by 1. Cases or controversies or 2. Impeachment, by allowing me to correct courts within an actual case and controversy. *Amos* 5:15 ("Justice in the courts" is a command); *Matthew* 23:23 (Jesus teaches justice and mercy are greater commands than monetary and material laws.); *John* 7:24 (Jesus commands "Do not judge based on appearance, judge correctly.")

(See the following Bible passages against partiality in the courts, *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"); (*Exodus* 23:6, "You shall not deny justice to the poor in their lawsuits."); (*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."); (*Deuteronomy* 16:19, "Do not deny justice or show partiality. Do not accept any bribes, for a bribe blinds the eyes of the wise and twists the words of the righteous."); (See, *James* 2:1, "do not show favoritism."); (*James* 2:9, "But if you show favoritism, you sin and are convicted by the law as transgressors."); (*Proverbs* 18:5, "Showing partiality to the wicked is not good, nor is depriving the innocent of justice."); (*Proverbs* 24:23, "These also are sayings of the wise: To show partiality in judgment is not good."); (*Malachi* 2:9, "So I in turn have made you despised and humiliated before all the people, because you have not kept My ways, but have shown partiality in matters of the law."); (*Job* 34:19, "who shows no partiality to princes and does not favor the rich over the poor, for they are all the work of his hands?"); (*Job* 13:10, "Surely He would rebuke you if you secretly showed partiality.").

serve business greed not humanity or their Constitutional liberty from enslavement to government backed private or foreign colluding partners.

This case allows for actual justice with mercy and correction within Article III limits as opposed to destruction under biased judicial disciplinary proceedings which punish judges with no power to improve the administration of justice by threats of punishment, and possibly violating the Equal Protections component of the 5th by allowing accusers without standing to cherry pick off judges to win cases. I am very concerned about judges getting set up too. Some people lie and make false allegations. Moreover, the disciplinary rules will certainly set up Supreme Court members for unnecessary impeachments by congressmen who cry, “this or that judge appeared to break this rule. We have no choice. We must impeach.” Please give me an opportunity to be heard by remanding this case below to assert my rights and to safeguard the integrity of the courts in an actual case or controversy.

I also discovered there is an agenda for the government backed private and foreign partners to take over the government’s authority to govern to eliminate the government. There is evidence of an agenda to eliminate the judiciary in order to eliminate the government’s ability to govern, to take over the government’s authority to ultimately eliminate the government to eliminate the rule of law that restrains entities from oppressing, enslaving, killing, stealing and destroying human life and health for the bottom line unrestrained by love or the just rule of law as there is an agenda to eliminate the impartial rule of law around the globe that safeguards freedom by economic, social and physical compelled compliance by those who will control the resources even technology. Since this is rather urgent I place it near the top along with a letter to Chief Justice I sent to him and all judges in response to Senator Whitehouse’s complaint attached hereto as DI 194, 79th Affidavit, attached hereto as App T-5.

4. Timing, after Kelly v Trump concluded and the Civil rights proceeding was filed, and the subsequent Attorney Disciplinary proceeding started, and ended, I discovered the DE Supreme Court concealed evidence in my favor, DE Supreme Court Attorney Robinson signed off on terminated Court staff, including a witness I noticed the Defendants I sought to cross examine, and sealed my petitions regarding the Sate's misconduct in Kelly v Trump to conceal evidence in my favor at the Nov 3, 2022 probable cause hearing, the civil rights case, Kelly v Trump and reciprocal cases.

After *Kelly v Trump* concluded I used a special research tool and discovered the Delaware Supreme Court concealed evidence in my favor during *Kelly v Trump* by sealing Motions 1 and 2, as motions and separately sealing them as exhibits to my Motion for reargument in *Kelly v Trump* to prejudice the outcome in my US Supreme Court Appeal No 21-5522, the Civil rights case filed 10/25/21, the disciplinary proceeding where the Board initiated a case without notice to me or anyone on my behalf 12/10/21, and reciprocal discipline cases in collusion to fix the outcome against me.⁹

After the Board Proceeding, I discovered the DE Supreme Court participated in firing two Court staff with testimony concerning disparate treatment supporting my claims while preventing me from subpoenaing and calling one the witnesses in the Board proceeding, by affording me fewer days than the more than 10 days in advance notice the rules required to call them, while the Board delayed by not responding to motions objecting to notice, appointment to counsel and for an opportunity to perform discovery and other motions.¹⁰

5. On 4/26/22, prior to the District Court's Order dated 4/26/22 denying motion for reargument, Kelly informed the District Court of the State eliminating 2 witnesses, Kelly's desire to amend the complaint once as a matter of right to conform to the facts, additional legal claim and additional parties in a rolling motion when remanded back; assertions against Disciplinary Rules 13 and 14, and proof the Delaware Supreme Court

⁹ App. Q, R, S incorporated herein 3DI 41 through 3DI 45, 3DI-98, 3DI-199, 3DI-187, 3DI 206, 3DI-208, DI 58., DI 4, DI 65, DI 66. Please note I was not aware that the District Court made corrections on 10/27/21 to the 10/25/21 filings because they were not made public per a Lexis representative until later. I later received ECF access which helped me to see the changed, corrected docket peer the May 8th letter at DI 41-1.

¹⁰ DI 58 DI-77 3DI-98

caused the interference in a letter by the court to me copying Defendant agent of the Board dated 10/21/2020

I apprised both the District Court and the Third Circuit of the Delaware Supreme court's collusion to seal and conceal evidence in my favor to prejudice the outcome in all of my cases.¹¹ I filed a letter on 4/26/22, prior to the 4/26/22 District Court Order alerting the District Court the Courts terminated two witnesses necessary to my assertions and defense, while also noting my intent to amend the complaint to include additional claims including Constitutional challenges to the Board proceeding and Board rules 13-14.¹² I filed additional pleadings in both the District Court and appellate Court concerning specific challenges to other State disciplinary rules, federal disciplinary rules, and disciplinary proceedings and rules against federal judges and the US Supreme Court.¹³ Also see DI 55 at App U regarding the state's denial of my access to the law library and other violations of a fair proceeding.

6 The State committed attacks against me during 2020-2021 to interfere with and cause me to forgo my case in Kelly v Trump, which included disparate treatment with religious political animus, court staff writing on praecipe dated 10/5/20, and directing me to cross off local counsel's address on praecipe to prevent service to local counsel, court staff misleading me to miss deadline for an order I did not know existed, sending Court of Common Pleas Judge Kenneth S. Clark to attack me in public at a grocery store demeaning my faith in Jesus not I money as God, and sending three threatening letters by the State to cause me to forgo Kelly v Trump prior to the US Supreme Court's denial of a writ.

I provided evidence the Delaware Supreme Court copied the Administrator of the Board on Professional Responsibility for attorneys in DE, Karlis Johnson in a letter dated 10/21/20

¹¹ 3DI-98, 3DI-199, The District Court staff indicated this Court may not be able to see the Docket items in the District Court I referred to in appeal. See also, App. M and 3DI 41 through 3DI 45.

¹² DI 58. App. T, filed showing my new discovery DE Supreme Court fired two staff to prevent me calling them as witnesses in my favor, and assert my intent to file a motion to amend once as a matter of right to include all the new and additional information, new claims, and specifically Constitutional challenges against rules 13 and 14 and proceeding.

¹³ App. T, App T-2, App-T-3, App T-4, DI 58, DI 77-79, DI 102, DI104, DI 123, 129, DI 130, DI-131, DI 132, DI 141, DI 145, DI 149, DI-152, DI-154, DI-155, DI 156, DI 158, DI 159, DI 161, DI 162, and more

responding to my request to be excused of notarizing documents in *Kelly v Trump* proving the Delaware Supreme Court caused interference and attacks during *Kelly v Trump*.¹⁴

Nothing was normal during *Kelly v Trump*. A Chancery Court staff intentionally instructed me to cross off the Civil Process Clerk's address on 10/12/20 to prevent service to local counsel US Attorney General David Weiss on a subpoena to prevent the case from going forward based on her support for President Trump-(“Trump”) religious views, and wrote on another praecipe on 10/5/20 which caused confusion and prevented service to local counsel. (App N-0) This same Chancery Court staff member intentionally sought to sabotage my case by causing me to almost miss my deadline to appeal the Master's Final Report based on my religious-political views. She indicated her support for Trump and supports freedom of government servants, like President Trump, to share religion unabridged by the Constitutional limits on government agents, thereby opposing my view to dissolve government-religion. Her intent was based on seeking to suppress my petition based on my religious beliefs in favor of Trump-religious beliefs, in violation of the 1st Amendment rights to speech, petition, religious belief, and exercise of religious belief. When I confronted her as to why she misled me not to come in to pick up the ruling, she snidely retorted it was available online. DI-4.

I filed the attached letter dated 11/6/20, received 11/9/20 regarding the staff misleading me to almost miss the 11/9/20 deadline to file a notice. (App. P). I did not want her to get fired, with DE Supreme Court staff attorney Robinson's participation, nor did I want the other court staff to lose her job. I merely desired to uphold my private Constitutional rights in a fair not partial forum. When I seek relief I seek to improve not to destroy. I am so sad about the two

¹⁴ App. T, DI 58 and DI 58-10.

court staff being compelled into retirement to conceal their testimony in my favor because I care about them. They should not have been forced to leave their jobs to cover up as opposed to correct court mistakes or misconduct.

The ODC impermissibly interfered with this case by contacting Court of Common Pleas Judge Kenneth S. Clark, per Judge Clark's admission. A-4, Motion-1. In mid-April 2021, the arms of the Delaware Supreme Court sent Delaware Court of Common Pleas Judge Kenneth S. Clark out to attack me. Judge Clark threatened me in public to cause me to forgo *Kelly v Trump* at BJs store located in Millsboro, Delaware, as if I was on trial for standing up for my faith in Jesus, solely based on my exercise of seeking relief in court based upon alleviating the government sponsored burden government-religion has caused on my free exercise of religion in *Kelly v Trump*. Id. I told Judge Clark I was disappointed in him for interfering for my exercise of the right to petition to safeguard my religious exercise. I was really upset since I have high regards for Judge Clark. I was so disappointed that day. A-4, DI 2, Id.

On 5/24/2021 De-Lapp sent an email and letter demanding I respond within 10 days feigning to offer help because they heard I petitioned for an exemption on bar dues, stating, "We understand that you may be experiencing some financial difficulties with regard to license fees." A-4. It was not help to pay the fee. I paid the fee long ago. DE-LAP was looking after its own interests, which conflicts from mine. I paid the bar dues in the amount of \$353 in February 2021 per the attached receipt contained in A-5.

De-Lapp based its attacks on my two petitions on bar dues before the DE Supreme Court only the Court and Defendant Kathleen Vavala's uncle, the Executive Director of the Delaware Bar Association, Mark Vavala. The Clerk of Court confirmed the entire DE Supreme Court

reviews such requests¹⁵. So, there is sufficient evidence on the record to conclude the Delaware Supreme Court incited DE-Lapp to interfere with my case *Kelly v Trump* to cause me to forgo my lawsuit against Trump. Moreover, I have religious objections to healthcare and mental healthcare.¹⁶

The ODC sent two threatening letters in interference with *Kelly v Trump* in violation of my 1st Amendment exercise of speech contained in my petitions revealing my religious beliefs applicable to Defendants pursuant to the 14th Amendment based merely on my association as a democrat, Catholic, Christian, lawyer.

On 8/23/21 the ODC alleged my pleadings before the Chancery and the [Delaware] Supreme Court, containing my religious beliefs was the reason they were concerned about my mental capacity as an attorney, despite the fact I previously argued my religious beliefs contained in my speech in my petitions were an impermissible reason to sue me but for disagreement with my religious beliefs, and the Constitution superseded state regulatory laws.¹⁷ For example in Motion 1 I averred:

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

15. “Congress, the Executive, and the Judiciary all have a duty to support and defend the Constitution.” *Salazar v. Buono*, 559 U.S. 700, 130 S. Ct. 1803, 176 L. Ed. 2d 634 (2010)

16. “There is no ‘de minimis’ defense to a First Amendment violation.” *Doe v. Indian River Sch. Dist.*, 653 F.3d 256, 259, 2011 U.S. App. LEXIS 16121.

17. “The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.” *Mullin v. Sussex County*, 861 F. Supp. 2d 411, 415, 2012 U.S. Dist. LEXIS 67571, *1

18. I will likely continue to suffer government threats by the state if the Court does not help me by upholding the Constitutional limits from state overreach.

¹⁵ App V, DI 51

¹⁶ See Motion 1 at 27 and Exhibit D at Exhibit 43, also see DI 4 and 3DI-121, in US Supreme Court petition for one example of many on the record.

¹⁷ Exhibit B.

19. I am standing up for my personal freedom to worship Jesus according to the dictates of my conscience, even if no one else shares the same beliefs, without government persecution.

20. I am permitted to believe differently than the government through its agents, even if what Jesus teaches seems foolish to the world. 1 *Corinthians* 1:18, 2:14-16.

21. “Government official's conduct violates “clearly established” law, so that the official is not entitled to qualified immunity, when, at the time of the challenged conduct, the contours of a right are sufficiently clear that every reasonable official would have understood that what he is doing violates that right.” *Id.*[*Werkheiser v. Pocono Twp.*, 780 F.3d 172 (3d Cir. 2015), (explaining Supreme Court's two-step *Saucier* test)]

22. I do not wish to have any disciplinary action against any of the government representatives for misconduct. I desire fair access to the courts, without government persecution based on my exercise of redressing a grievance to alleviate the burden upon my free exercise of religion from Government sponsored religious persecution directly caused by government establishment of government-religion and government-religious views.

23. I object to disparate treatment based on religious affiliation on due process, first amendment and equal protection grounds. I object under RFRA too. See, *Tanzin v. Tanvir*, 141 S. Ct. 486, 208 L. Ed. 2d 295 (2020). The Supreme Court in dicta explained RFRA applied to state and local employees and agents, not merely federal officials.”

Instead of stopping my case, the letter expedited my action to file my petition to the US Supreme Court that same day 8/23/21.¹⁸ The ODC interfered again by sending a second letter late September 2021¹⁹ with knowledge I believe people go to hell for trusting in, referring people to mental healthcare professionals or adopting mental health theories as I outlined in Motion-2, in an attempt to compel me to violate my religious belief by undergoing such an examination under the threat of prosecution and the color of state law by examination. DI-3, DI-4. See, *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 682, (“Courts have no business addressing whether sincerely held religious beliefs asserted in a RFRA case, [including mine] are reasonable.” In this case this court recognized a protected right to religious objection to certain healthcare.). I sent an email requesting they desist in interfering with my case, and objecting on

¹⁸ *Id.* DI 4

¹⁹ DI 3

1st Amendment religious grounds to examinations. I have religious objections to healthcare and mental healthcare. App T

7 ODC's letters threaten Kelly with punishment to compel her to violate her previously asserted 1st Amendment religious objection to healthcare, and mental healthcare and threaten actual punishment but for finding her religious beliefs in Jesus and citations to the Bible as a source of her religious beliefs in defense of her private beliefs proof of disability

I sincerely hold the religious belief believe people commit lawlessness aka sin leading to the fires of hell should they not repent by telling people to trust the experts, rely on healthcare professionals, mental health professionals, or other professionals or their products, services, products, science or technology in place of God which is idolatry leading to certain damnation should they not repent. *Romans* 1:25. Such conduct makes professionals above the law by court deference to professional boards, professional standards and the mere studies of students who may harm human life, liberty or health life, health to serve what I believe is the mark of the beast business greed, productivity, material gain, even knowledge or convenience unrestrained by unconditional love written on their hearts or the just rule of law.²⁰ I specifically have religious objections to mental health theories which I believe teach people, especially little kids, to go the way to hell by chasing after the desires of man and man's goals, instead of obeying God, by laying down the desires of man to choose not to give into physical, chemical, economic, social or other temptation to do what is right for eternal not material gain or convenience of man.

²⁰ *Romans* 1:25 ("They exchanged the truth about God for a lie, and worshiped and served created things rather than the Creator"); See *Jeremiah* 31 regarding God's law of love written on the hearts of man; See *John* 2:16 (those who do business as worship are not welcome in God's house. Teaching giving to get is love drives out love from the hearts of man replaced with the love of money); *Matthew* 6:24 ("You cannot serve God and money."); See *Mark* 8:36-38 ("What profits a man to gain the world to lose his soul" [in hell]...); *Romans* 4:4 (Job creation is not good or charity. It is giving to get); See *Matthew* 6:1-4 (Volunteering, fundraising and organized charity is sin leading to hell, and is not true charity but teaches giving out of one hand to get business is alms, driving out God from the hearts of man replaced with the mark of the beast); See *Genesis* 3 (The punishments of original sin are meant to humble man not to glorify man by teaching them to have pride in their work, marriage and kids leading to hell, by glorifying man's work in place of God).

Defendants knew of my religious objections to healthcare and mental healthcare. I included them in Exhibit 43 to Kelly v Trump, attached hereto at the last few pages of Exhibit D. I also sent them emails asserting my religious beliefs and other 1st and 14th amendment rights including right to a fair proceeding in Kelly v Trump. I asserted my Constitutional rights which preempt an alleged made up regulatory interest the Defendants may assert. Even if there were a legitimate interest, Defendants should have not violated my procedural due process rights and interfered in Kelly v Trump. The Defendants and DE Supreme Court members attacks was brought with religious-political and poverty animus, with almost 20 years displaying religious-political animus as outlines in DI2, DI4, causing me to lose about 2 million dollars in expected income and other irreparable harm by compelled religious violations of my asserted religious beliefs, even at my admission to the bar. DI 2, (Complaint) DI3 (District Court exhibits to complaint, DI 4 (Kelly v Trump exhibits to Complaint).

7. On 10/25/21, Kelly Filed this civil rights law suit for monetary damages and equitable relief for emotional distress, violations of procedural due process, Equal Protections claims, First Amendment violations of private rights to petition, religious belief, exercise of belief, speech and association, loss of employment opportunities, or other economic harm, harm to my reputation, witness tampering, procedural due process violations and in violation of 42 USC §§§ 1983, 1985, 1988.

On 10/25/21, I filed this civil rights case Kelly v Swartz, et al, wherein I sought to enjoin a disciplinary proceeding from initiating, 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. (DI 2-4) I sought claims for emotional distress, violations of procedural due process, Equal Protections claims, First Amendment violations of private right to petition, religious belief, exercise of belief, speech and

association, loss of employment opportunities, or other economic harm, and harm to my reputation during Kelly v Trump.²¹

On 10/25/21, I also filed a TRO, Preliminary Injunction, exhibits showing almost 20 years of the State's retaliation or compelled violations of my asserted rights or other disparate treatment at DI 3 and DI 4, a Motion to expedite, Motion for remote proceedings and to appear remotely, and a motion for an exemption of pacer fees.²² On 10/27/21 I drove 4 hours round trip to District Court and filed a hand written letter I quickly drafted for immediate emergency relief emergency relief and stated.²³

"Dear Honorable Court,

Per the kind suggestion of your staff I write to respectfully request emergency immediate relief with regards to my motion for a temporary restraining order, and to serve this request with the motions, complaint and exhibits thereto filed Monday [October] 25, 2021 together.

The Defendants seek to proceed to disbar my license to practice law for my exercise of protected 1st Amendment rights, including speech, association, exercise of religion, and petitioning of the courts in violation of the First Amendment applicable to the Defendants pursuant to the Fourteenth Amendment, in violation of 42 USC Sections 1983 and 1985 on November 3, 2021.

I requested relief without notice in my motion for a temporary restraining order, given the immediate threat of irreparable injury, with little time to serve the Defendants.

I filed a separate motion for a preliminary injunction affording time and opportunity for Defendants to respond.

On October 29, 2021, the US Supreme Court is scheduled to consider my plea Kelly v Trump, 21-5522 from which this lawsuit arises.

Given the immediate irreparable harm to me, I respectfully request emergency relief to protect my exercise of protected rights and my ability to be free from retaliation and loss or potential loss to my reputation, and my ability to practice law. I worked so hard to get my license to practice law, and should not be penalized for seeking help as an injured party."

On 11/2/21, I mailed a letter to District Court stating.

"...The Defendants intend to go forward with the proceeding against me for the exercise of my First Amendment right to petition, speak exercise religious beliefs and

²¹ DI 2-DI-3, DI-4

²² DI 7-12

²³ DI

associate, motivated by their desire to suppress my exercise of civil rights, in disagreement of my religious associated beliefs on November 3, 2021.

Please enter an order on November 3, 2021 to prevent injury to me, and prevent the need for an additional law suit in Delaware Supreme Court. Delays will not cause substantial injury o Defendants.

I will go to the library and scan in the order to send it to the Defendant's counsel immediately, should you sign one to prevent irreparable injury o me. I will sit at the courthouse on November 3, 2021, in hopes you sign an order. I fear irreparable injury should the Court delay longer in terms of harm to my reputation causing government suppression of my speech, the loss of my ability to find work as an attorney, persecution for the exercise of my religious beliefs, no matter how repugnant they may be to Defendants, government agents. Please help. Thank you." DI 18

On 11/3/21, I drove the 4 hour round trip to the District Court an dropped off a letter and sat waiting. DI 19

To my horror, unbeknownst to me the District Court dismissed my case under Younger on 11/2/21. DI 15-16, App. I.

8. Probable cause hearing occurred where the Defendants accessed the docket according to Lexis's November 4, 2021 date. It is a delayed date, with evidence in my favor sealed. The petition cites my religious beliefs and citations to the bible in Kelly v Trump to be the reason for the petition.

On 11/3/22, Defendants brought a petition for probable cause. Defendants' petition at 7, attached hereto as Exhibit D averred my religious beliefs and references to my bible *in Kelly v Trump* is the reason and asserted proof of mental disability, despite the fact my religious beliefs are in issue in the RFRA lawsuit. (See Exhibit A, B, C, D).

The Lexis documents showed the Defendants accessed the record during the probable cause hearing, since the last check date shows the next day. Since my pleadings necessary for my defense were sealed, it appears there was not a full and fair record of Kelly v Trump for the professional board members to determine probable cause.

9. District Court Dismissed my Complaint under Younger. I filed a Motion for Reargument and Motion to Amend the Motion for reargument. I showed the DE Members participated in the State's attacks. Since, I had an appeal in Kelly v Trump to the US Supreme Court, I did not add the DE Supreme Court members initially because the writ of

cert may be granted in Kelly v Trump, and the case remanded back to the Court. I alleged additional damages and claims. The State threatened to compel me to violate my asserted 1st and 6th Amendment asserted right to self-represent as a religious-exercise, which caused emotional distress so great a police made a wellness check. During check I told him I couldn't find the police report where I told the police people talked about shooting me. No report was made, despite the fact I told the police. It may have been a police officer from my former gym outside of his jurisdiction checking on my car because someone threw something at it.

District Court dismissed my complaint under Younger on 11/2/21, which I was unaware of when I drove the 4 hour trip to the courthouse on 11/3/21. DI 16-18, App I.

I filed a motion for reargument Order was filed to dismiss my case under Younger. I filed a Motion for reargument under great duress since the State sought to compel me to violate my religious beliefs by appointing counsel in violation of m 6th and 1st Amendment right to self-represent per an email. DI 20-DI 21.

I drafted a Motion for reargument dated 11/6/21 filed 11/8/21, attached as DI 20, attached hereto with exhibits and incorporated herein by reference where I averred inter alias:

“Plaintiff Meghan Kelly, pro se, brings this motion for reargument pursuant to FRCP Rule 59(e), and D. Del. 7.1.5 (a), on the order (D.I 17) in objection to and request to vacate each and every one of the court's findings denying my motions to expedite, for a temporary restraining order, a preliminary restraining order, exemption from bond, for emergency relief, motion to appear remotely, motion to electronically file, with a waiver of electronic filing fees, abstention under the Younger and the dismissal of this case, based on supremacy of federal law, the absence of opportunity for relief in state courts, essentially eliminating my ability to protect my fundamental rights in exchange for my license to practice law, sacrificing individual liberties including my religious exercise, speech, association and petitioning the court for relief against disparate treatment towards me by government agents motivated by their disagreement with my religious exercise, petitions, poverty, association and or speech. (D.I. 1-19).

I also seek to vacate the Order because the Court erred as a matter of law by disregarding all my pled facts, pled legal arguments, not limited to Defendants' conduct, and the conduct through its coconspirators, or agents De-Lapp and Judge Clark, a Court of Common Pleas, in violation of federal law, where I am a party for my exercise of federal rights, and by initiating a proceeding, under the color of the law, in violation of the Constitution and federal law, as applied against me, a party of one, under the

pleadings in my complaint, and exhibits incorporated therein by reference, and in the motions, and exhibits thereto, motivated by their disdain for my religious beliefs reflected in my speech, petitions and association. Id. Judge Clark sought to intimate me with the cloak of his Court authority related to and with intent to interfere with my exercise of First amendment rights. (D.I. 1-19). He interfered with my case, seeking to interrogate me, and demand I call him or come to his chambers. I made petitions for relief to suspend attorney license fees due to poverty. I made petitions to Master Griffin of the Chancery Court and the Supreme Court related to disparate treatment by staff based on poverty, religious beliefs, association and, or petitions. The Chancery Court through staff to misled me into almost missing my filing date to appeal Kelly Trump, and instructed me to cross off the Delaware lawyer's address in the praecipe to prevent service to local counsel..

The Court abused discretion by disregarding the facts and legal arguments I pleaded, and by making no determination on such arguments. The Court made an error of apprehension. Id. Even on a Motion to dismiss the Court is required to consider "whether the allegations on the face of the complaint, taken as true, allege facts sufficient to invoke the jurisdiction of the district court." *Licata v. U.S. Postal Serv.*, 33 F.3d 259, 260 (3d Cir. 1994). The Court abused its discretion by ignoring, failing to address all the facts and pleadings in my complaint and motions before dismissing a case, related to fundamental rights requiring strict scrutiny to be upheld. Defendants face no irreparable harm. I am not working and have not represented anyone but myself, as an attorney in years, and will not represent anyone anytime soon. I sought to make a difference differently by attempting to revise the laws over the years. I believe religion and state must be separate. People should worship or not according to the dictates of their conscience, not the dictates of the government through their partners, including religious entities. When my religious liberties were at stake, I gave up public office aspirations for God, in hopes the Courts would safeguard our religious freedoms.

Younger does not apply. I am not asking the Court to make a disciplinary determination. I am asking the Court to, inter alias, (1) enjoin the Disciplinary Proceedings until a determination is made, leaving time for appeals to determine whether the conduct by the defendants violated the first amendment applicable to defendants pursuant to the fourteenth amendment concerning my free exercise of religion, speech, association, and petitioning the government to address grievances, 42 USC §§ 1985(2), 1983 ("federal law"), and (2) determine whether the proceedings themselves are a violation of federal law. (D.I. 1, 2, 3, 4, 9, 10, 7, 8, 6, 12, 11, 14.) (1)

The conduct by Defendants and the coconspirators as pled are a violation of federal law, and (2) the proceedings themselves are a violation of federal law. (D.I. 1-19). I asked the Court for a preliminary injunction, a temporary restraining order, and waiver of bond to prevent the suppression of my right to petition to safeguard my civil rights due to destitute and inability to pay to prevent waiver of my First Amendment rights based on inability to pay. I did not ask the court to conduct a disciplinary trial.

My complaint asks for additional relief, and alleged additional harm beyond injunctive relief, including but not limited to damages, physical harm, humiliation, emotional distress, harm to my life, safety, livelihood, and other relief from harm the Court did not address. [Emphasis intended] Injunctive relief while the main relief, is not the only relief I requested. I would also like to include nominal relief, as the violation of my First Amendment rights are more important to protect than money or my license, though I seek to protect my license and ability to find work too. (D.I. 2, 3, 4). *Uzuegbunam v. Preczewski*, 141 S. Ct. 792, 794, (2021).

Someone talked about shooting me based on my speech reflecting my religious affiliated beliefs, albeit before the suit, a scary man took off his mask and got close to my face and yelled at me for my apparent beliefs endangering me to covid-19, and Mr. Layton had two bullets almost hit him and his wife as they sat at their kitchen table in their home for his exercise of First Amendment rights. D.I. 2, 3. I am scared Protection of my freedom of speech, religious exercise, association and right to petition, despite religious beliefs, poverty, unemployment, and profession is something I seek this Court to protect which is far greater than my active license to practice law, or all the money in the world, for freedom cannot be bought and sold, should the court fail to grant injunctions, with claims for nominal damages, potential additional relief as more harm arises, and damages.

The Defendants and Court agents by their positions are not above the Constitutional law, immune to punish me for my exercise of a fundamental right requiring their need to meet strict scrutiny which it does not. I do not lose my right to seek relief in Court for their violations of the Constitutional law and federal laws in exchange for my license to practice law or by the institution of proceedings against me.

They knew or should have known their conduct violated federal law, even if I am poor and unemployed. I am not deemed less worthy of protections under the law by mere poverty, but am equal to those of great wealth under the constitution. Judges and arms of the court are not above the Constitution and must be limited to adhere to the Constitution by outside courts should they overstep. I did not sell my soul to hell for my license to practice law, nor did I become enslaved to the false God of money in exchange for my license to practice law. Any sacrifice of religious freedoms of conscience for the profit and control under the guise of order of the profession, even at the cost of human sacrifice of individual Constitutional liberties, is a sacrifice too great.

I am protected under the Constitution for my religious beliefs, religious exercise, speech, petitions and association, even if I am in destitute utter poverty, an attorney, and even if Defendants find my religious associated beliefs, speech and petitions, which reflect my religious exercise and beliefs, repugnant or crazy. I am protected even if I made mistakes in court, in my desperate desire to serve Jesus by protecting God's holy name. Defendants are not immune for conduct they knew or should have known as attorneys were Constitutional violations. Immunity is removed. *Werkheiser v. Pocono Twp.*, 780 F.3d 172, 176 (3d Cir. 2015), I.D 2 at 188, 194, 201-204, 236-239, 336,

My faith in God the father, Jesus, and the holy spirit are in issue in this case, my complaint *Kelly v Trump* relating to a substantial burden upon my free exercise of religion, and are in issue, as the motive, an improper motive for Defendants' case Board Case No. 115327-B per Defendants admission per the attached complaint marked as (Exhibit 1. at 7), and per my Complaint, motions and exhibits. (D.I. 1-12, 14) Defendants bring a wrongful proceeding against me because they find my religious beliefs in Jesus, "a serious concern regarding my mental capacity" *Id.* They allege they do not understand my beliefs in Jesus [by stating they] "are objectively illogical; and rely on non-legal sources, including the Bible." See, *Africa v. Pennsylvania*, 662 F.2d 1025, 1025 (3d Cir.) ("Judges are not oracles of theological verity, and the founders did not intend for them to be declarants of religious orthodoxy."); *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 682. ("Courts have no business addressing whether sincerely held religious beliefs asserted in a RFRA case are reasonable.") My claims against Presidents Trump and Biden, and the Defendants' wrongful action against me relate to my pleadings in RFRA action *Kelly v Trump*; *Employment Div., Dept. of Human Resources of Ore. v. Smith*, 494 U. S. 872, 887, ("Repeatedly and in many different contexts, we have warned *that* courts must not presume to determine the place of a particular belief in a religion or the plausibility of a religious claim."); *Presbyterian Church in U. S. v. Mary Elizabeth Blue Hull Memorial Presbyterian Church*, 393 U. S. 440, 450 (1969); *Ben-Levi v. Brown*, 136 S. Ct. 930, 934, See, *Holt v. Hobbs*, 574 U.S. 352, 352. I am not required to make what is clear to me, clear to Defendants or the Courts. The Courts must merely believe my faith and beliefs are genuine, a fact to me, as alleged. They do not have to agree with my religious beliefs, merely believe I believe God as I pled, as a fact to me.

Defendants also seek to appoint counsel for me, at my expense, when I am impoverished, and going into debt is against my religious beliefs, and appointed counsel is against my religious beliefs, as I believe God is my advocate in the disciplinary case. (D.I. 10, regarding debt violates my religious beliefs). I must stand or fall on my faith. I will allow the holy spirit to be my advocate. An attorney advocate cannot adequately represent my religious beliefs. (Exhibit 2). My faith in Jesus does not make me disabled, even if Defendants deem it irrational, including my religious opposition to mental and physical health examinations and care as stated in my complaint. D.I. 2.

My poverty, while a disadvantage to me, does not make me disabled. Even the poor are afforded protection for the exercise of their First amendment rights. Our fundamental freedoms are not free if they are for sale to only those who can afford to pay to exercise civil rights. The Court erred in failing to consider the loss to the public of their loss of first amendment rights as they are in danger of being labeled as disabled for merely exercising federal rights, making the government above the Constitution and the rule of law, and the poor and those with diverse beliefs below the law. The Court erred in failing to address the loss to the public of my speech, association, potential representation, affiliation and ideas. D.I. 1-19.

The Court did not examine the facts or legal arguments pled in my complaint, or the motions, and exhibits thereto incorporated therein, for a preliminary injunction, temporary restraining order and waiver of bond, and other motions. Id. (D.I. 1-9).

The Constitution and Federal laws supersede state law arguments. The court ignored superseding constitutional issues, arguments and facts related to those issues, blinding its eyes guaranteeing injustice towards me, and similarly situated parties who are not below the law by poverty or pro se status, but are afforded Constitutional protections to exercise their First Amendment rights without retaliation or interference by government agents acting under the color of law seeking to suppress or punish claimants for their exercise of fundamental liberties. The cloak of color of law by Defendants, and government agents, does not give the government lawless reign, constitutional immunity to violate the Constitution, with no accountability for such violations by using the color of the law to obstruct and prevent my access to the courts. The color of the law acts as both the sword and shield per (D.I.15 and D.I. 16), rendering the Court and the arms of the Court above the law, above the Constitution, and must be overturned to prevent clear injustice.

The Court erred by not considering or even addressing my fundamental rights and Constitutional arguments which preempt state law proceedings, and the Chancery Court's staff's and Delaware Supreme Court Chief Justice' participation in the retaliation, and intentional interference to obstruct, harass, interfere, or pressure me to forgo my case, Kelly v Trump, by instigating DE-Lapp and ODC proceedings against me motivated by their disdain for my personal, religious affiliated beliefs, speech reflected the same, exercise of my right to petition, poverty, association and religious exercise, and as this case may bar me from rearguing Defendants' violations of 42 USC Sections 1983, and 1985(2), and First Amendment violations applicable to Defendants pursuant to the Fourteenth amendment before the Delaware Supreme Court, should a negative holding against me be found. (D.I. 1-D.I 17).

The evidence shows the Delaware Supreme Court justices partook in the federal law violations. The Defendants and DE-Lapp and coconspirators allege they brought the complaint due to petitions [related to bar dues] I filed with the Delaware Supreme Court. (D.I. 3, and D.I. 10, D.I. 8, De-Lapp Letter and A-4, A-5). Only the Delaware Supreme court judges knew of my petition to suspend lawyer fees for all unemployed lawyers due to the pandemic, albeit Mark Vavala knew too. Only DE Justices knew of my pleadings as no party responded. The source of the wrongful complaint against me brought to interfere and punish me for my exercise of fundamental rights and belief in Jesus appears to be rooted in the DE Supreme Court's instigation who will be complainant, judge and jury against me in a proceeding brought in retaliation and interference of my exercise of civil rights, motivated by their desire to suppress my religious associated beliefs. It is injustice guaranteed as the Supreme Court appears to have partook in federal law violations against me. It would be improper for me to name the Court as a party since I had a case before them, but it appears the Court seeks to sue me, and I no longer have a

case before them. [The United States Supreme Court denied my writ of Cert. in a letter dated Nov. 1, 2021, and I now may sue them] The [Court] may interplead if they so desire instead of wasting resources, although I prefer not to sue the court, only to protect my fundamental rights, especially to exercise my faith in Jesus. (Exhibit 3).

The Court erred as a matter of law by indicating I could receive relief in state court, where no relief is afforded as the Chancery Court and Supreme Court participated in the facts that are the subject of this dispute, forcing Procedural and Due process violations and eliminating my access to the only court who may afford me relief, the District Court. Defendant is the initial judge, while I can argue illegality as a defense, Defendant and the coconspirator Court would wrongly grant immunity to any action I would have brought in state court, giving themselves power to be above the law and Constitution as the courts participated in the conduct which is the cause of this action. "Congress, the Executive, and the Judiciary all have a duty to support and defend the Constitution." *Salazar v. Buono*, 559 U.S. 700, 717 (2010). The conduct by the Chancery and Delaware Supreme Court are the subject matter of this dispute, sabotaging my case by attempting to mislead me to miss my deadline, directing me to cross off DE lawyer's address to prevent service, petitions, and other activity. I petitioned the Chancery Court concerning disparate treatment against me, a party of one, and suppression of my First Amendment liberties by members of the Chancery Court, in addition to members of the Government by filing complaints in the Chancery Court against the Department of Elections and against Presidents Trump and Biden for their requirement I sacrifice my exercise in religious beliefs or other First amendment rights in exchange for the exercise of other rights. (D.I. 4, Exhibits A-4, A-5, 2, 5, and Appendix G), (D.I. 3 at Exhibits 12, 11, 17.) The Supreme Court justice, Judge Clark, and Chancery Court staff are expected to be witnesses to this case. See Exhibit 4. I petitioned the Delaware Supreme Court concerning government agents, acting under the color of law pressuring me to forgo Constitutional rights, with intent or to interfere, punish retaliate, substantially burden and obstruct my exercise of protected rights, motivated by their desire to suppress the exercise of my protected religious exercise, speech, petitions and association, in violation of federal law. 42 USC 1985(2), 1983, USC Section 1. (D.I.3, Exhibits 11, 12, 13.).

The authority vested in Defendants under color of state law to conduct investigations and disciplinary proceedings for attorney misconduct do not permit the Defendants to knowingly violate the Constitution and federal laws including Conspiracy to harass, interfere or pressure a party, me, to forgo my case, motivated by their disdain to my poverty, association, religious exercise and beliefs manifesting in my speech and petition, and retaliate against a party for exercise of her civil rights, no matter how repugnant my religious beliefs may be, free will is more important than order and control, bending people's will making society less rich with truth and the free flow of diverse ideas, debate allows, by wrongfully bringing proceedings in violation of federal law as applied to me

State courts are unable to afford me relief to enjoin the wrongful proceedings against me since members of the Chancery Court and the Delaware Supreme Court likely participated in misconduct by making complaints to Defendants or to agents who made complaints to Defendants. Members of the Delaware Supreme Court were aware of the information DE-Lapp and Defendants refer are the reasons for their wrongful disciplinary proceeding against me. (D.I.). The Court cannot clean Defendants' hands because its owns hands are dirty by involvement in conspiracy to interfere, harass, or pressure me to forgo my case, and in conduct retaliating against me motivated by their disdain for my religious beliefs manifested in speech in the petitions. I would be prejudiced in state court, and have a right to bring my federal claims in this federal court. I must be afforded opportunity to plead my case to prevent injustice, by the elimination of access to the only court able to afford me relief. The Chancery Court is the state court with jurisdiction to grant equity and injunctive relief. The Delaware Supreme Court, which has no jurisdiction to enjoin the Defendants pending a determination of my federal claims, only this Court has jurisdiction, without manifest prejudice and clear error of the law under the facts in the pleadings the court failed to consider. I would be prejudiced by elimination of my First amendment rights with no recourse in the proceedings below as members of the Delaware Supreme Court and Chancery Court appeared to participate in retaliation against me and the institution of the unconstitutional proceedings against me.

My letter to the Delaware Supreme Court [for an exemption from bar dues for all attorneys facing economic hardship dated 2/5/21], which may have been reviewed by all members of the Delaware Supreme Court is the reason why DE-Lapp alleged they instituted proceedings to investigating me under the guise of offering help, since all fees were paid, possibly to cover up the letters I petitioned to Master Griffin. Thereafter, Defendants received Delaware Supreme Court filings, and allege this is the reason they seek disciplinary proceedings. How did they get them? Not through the unserved Defendants, but likely through the members of the Court or through their agents. The prosecutor must not be the judge in my claims for relief for Defendants' retaliation against me for the exercise of my protected rights, and for interference with my case, Kelly v Trump. I do not ask this court to conduct a disciplinary proceeding, merely to determine whether the Defendants conduct alleged in my complaint, and the proceeding itself are violations of the laws I alleged in my complaint, to prevent the persecution against me by government agents, and the precedent endangering others of loss of protected freedoms by government agents... “²⁴

On 11/8/21, I filed a motion to amend my motion for reargument with exhibits, and an amended motion for reargument attached hereto and incorporated herein at DI 21 to clean the motion I drafted under great duress up wherein I indicated a police officer made a wellness check

²⁴ DI 20, see attached for exhibits. When I copied and pasted this, it became a block. So, I attempted to indent paragraphs which may not be the same as the attached DI. 20.

based on the postal worker noticing I was so upset and did not feel safe by the government government compelled religious violations. We talked about the people who talked about shooting me in Dagsboro. I was especially upset since I had objected to appointment of counsel based on 1st Amendment religious belief and my 6th Amendment right to self-represent. I averred therein:

“Pursuant to FRCP 15 (a)(1) (1) “A party may amend its pleading once as a matter of course within 21 days after serving.” On Saturday November 6, 2021, I mailed a motion for reargument by certified mail, sent to both the Court and Defendant’s counsel. On November 6, 2021, by separate US Mail, I sent the proposed order to the court and defendant’s counsel. This is within 21 days.

My computer is broken and is in repairs. (Exhibit 1, proof of mailing.) I alerted Defendants through their counsel of my repairs, with attached pictures. (Exhibit 2 Email to counsel. Typing is not my strong point. My apologies.) Today, I was informed my computer is not fixed. (Exhibit 3, Email from insurance provider).

I am in immediate danger, and was required to send the Motion for reargument, on Saturday before noon to alert the court in hopes to prevent immediate irreparable injury to me and the public, on arguments I am likely to win under 42 USC Sections 1983, 1985(2), 1988 and the First Amendment applicable to Defendants pursuant to the Fourteenth, with no harm to Defendants, where Defendants’ interests do not meet strict scrutiny, allowing them to persecute me based on my beliefs in Jesus Christ. I had to send it regardless of typos, without opportunity to correct to prevent immediate, irreparable injury to me, and continuous irreparable injury to me.

I care more about my ability to exercise my religion freely, and openly without threat of government persecution than I care about my license, and ability to work at my old law firm performing real estate settlements down the line, as I do not enjoy litigation. So, I looked at registration to see whether I could deactivate my license to practice law. Even though I have not practiced law in 6 years, it indicated I could not deactivate my license due to the ODC filing on November 3, 2021. (Exhibit 4)

I came before the Court to protect my First Amendment rights, and subordinately prevent punishment for my faith in Jesus by Defendants who seek to place my active license on inactive disabled. It is insulting to me. My faith in Jesus is not a disability. My poverty is not a disability.

On Friday, November 6, 2021, I was served papers by Defendants seeking an order against me which would violate my faith in God by allowing them to examine me by a mental health expert. I should not be required to violate my faith in God risking losing my eternal life to maintain my license to practice law. Lawyers should not sell their souls for potential monetary gain, to lose their eternal life in the hopes to pursue justice. (Matthew 23:23, Amos 5:15, Matthew 16:26 “What good will it be for someone to gain the whole world, yet forfeit their soul? Or what can anyone give in exchange for their soul?,” Matthew 6: 24 ““No one can serve two masters. Either you will hate the one and love the

other, or you will be devoted to the one and despise the other. You cannot serve both God and money.” I choose God).

I was so shaken up, my heart hurt so badly, and I was trembling as I rushed to the post office to prevent irreparable injury, that the post office official, April, called the police to check up on me as I indicated I was not safe from government sponsored threats motivated to suppress my speech, petitions, association and exercise of religious faith in Jesus Christ, based on their disagreement in my faith in Jesus. I said, “they are going after me for my faith in Jesus. (Exhibit 5, police report) I am permitted to worship or not according to the dictates of my conscience, not the dictates of the government.”

Defendants seek to declare my faith in Jesus a mental disability through official proceedings. What is next will they lock me up because my religious beliefs do not conform to their expectations.

I was under great distress, and remain under great reasonable distress. My heart is hurting.

A state trooper made a wellness check November 6, 2021. I was humiliated and embarrassed to share my religious beliefs, persecution, and poverty with the kind State Trooper. I told the trooper that a stranger talked about shooting me in Dagsboro because of my stickers. He asked, “Why didn’t you call the police.” I responded I thought I did. I went to the state police, Millsboro, Dagsboro and Bethany police department to retrieve the report too. I did not realize until November 7, 2021, after I thought about it, that the fully uniformed officer I told, who inspected my car at World Gym in Millsboro, was probably acting a fellow kind gym mate, acting off duty or outside of his jurisdiction. (Exhibit 6, car with substance thrown at it for my speech).

Per my Complaint at paragraphs 42, 48, 89, 98, 112, 149, 156, 201, 268-290, 292-294, 306-308, 365-480, D.I. 2, D.I. 3, D.I. 4, with focus on US Ex 43 relating to healthcare, US Ex 2 the law suit against the Democrats regarding healthcare concerns, Exhibits 21-25 my emails providing notice for Defendants to desist based on religious objections to examinations District Court, Us Exhibit the outline of my religious objections in my writ of certiorari, the outline of my rejections to mental healthcare in my motion to the Delaware Supreme Court, and Exhibit A-4, my motion to the Delaware Supreme Court to reign in its arms through its agents from unlawfully pressuring me to forgo or impede my case to protect my free exercise of religion by relief it deems just, where I declare my objections to psychology and mental health..

I was under great distress, and remain under great reasonable distress should you find my beliefs are genuine.

A state trooper, Officer Partyka, made a wellness check November 6, 2021. I was humiliated and embarrassed to share my religious beliefs, persecution, and poverty with the kind state trooper.

I told Officer Partyka that a stranger talked about shooting me in Dagsboro because of my stickers. He asked, “Why didn’t you call the police.” I responded I thought I did. I went to the state police, and the Millsboro, Dagsboro and Bethany police department to retrieve the report. I did not realize until November 7, 2021, the fully uniformed officer I told, who inspected my car at World Gym in Millsboro after someone threw substance all over it but for my stickers, “No one is above the law, No one is below the law,” “Impeach,” “Serve your country not your seat,” was probably a fellow kind gym mate, acting off duty

or outside of his jurisdiction. (Exhibit 6, a picture of substance on my car). That is why I could not retrieve the report I looked for. D.I. 2, 3, 4.

Defendants also threatened to file a motion on November 8, 2021, to have an attorney appointed for me. I objected on religious grounds, which also shook me up. Per my Motion and Memorandum for a preliminary injunction and complaint, going into debt is against my religious beliefs. D.I. 6, 7,8, 9,10.

I objected to appointed counsel on religious grounds. 1. Going into debt violates my religious beliefs 1. as outlined in the preliminary motion and memorandum, and 2. I believe God is my advocate in the disciplinary proceeding.

In John 14:26, Jesus taught, “the Advocate, the Holy Spirit, whom the Father will send in My name, will teach you all things and will remind you of everything I have told you.”

In Mark 13:11, Jesus taught, “Whenever you are arrested and brought to trial, do not worry beforehand about what to say. Just say whatever is given you at the time, for it is not you speaking, but the Holy Spirit.”

It is against my religion to allow an attorney advocate to defend my religious beliefs in the disciplinary proceeding. An attorney advocate is not in the position to stand up for my beliefs in the disciplinary proceeding.

As to the case before you, I am not so sure. I need to pray about it. The cases relate to my religious beliefs. My beliefs are at issue.

With regards to exams and alleged mental health, I believe people lose eternal life for relying, performing, recommending and allowing the conduct of mere man to examine the will of another by examinations relating to alleged mental health, psychology or behavioral theory. I believe the mental healthcare industry teaches the way to hell guaranteed by tempting man to bend their will to their own desires or the will of the world, conditioning them to live conditionally, instead of laying down their will to love God unconditionally, and subordinately to love others, unconditionally, unearned, as yourself. I believe lost people seek happiness. Children of God seek holiness. The happiest people have hardness of heart. Since they are either ignorant of the evils of the world, or they do not care to love those who inconvenience them, which is not violating Jesus’s commands by organized charity or fundraising which leads to hell. It is not referring people to government resources either. Love is sacrificing from self in secret to care for another at a worldly lose for a Godly gain. (Matthew 6:1-5.)

My belief in Jesus Christ, what he says, is not popular. Jesus commands us to call no one our teacher but God. I believe churches will go to hell as they mislead many there for asking other people for money to give to others, instead of merely asking for their own needs, or giving from self in secret to care for others with no worldly reward, not taking from others to give to those in alleged need, in direct violation of Jesus Christ’s commands in Matthew 6:1-5. This same religious violation, Matthew 6:1-5, is why I sued the democrats to run for office without violating my faith as asking for signatures or donations would compromise my beliefs, wrote the US Supreme Court concerning running for President, and is a major concern in the lawsuit I filed against President Trump, and hoped to file against president Biden by substitution. D.I. 4, Ex 2, Ex 50, Ex 51. I believe the rise in religious persecution against me and others in the country relate to the executive orders I mentioned in my complaint, creating a bought or bartered for union of government-religion, that is based on business not freedom, making my God a product to buy and sell.

Per John 2:16, those who worship by business are not welcome I church or in heaven per Jesus.

Jesus teaches “blessed are those who mourn,” meaning mourn at sin, our own and the world’s, not blessed are the happy. (Matthew 5:4, Hebrews 12:14,” Be holy, without holiness no one will see the Lord.”) Rather they are in danger of damnation, without repentance for seeking their own happiness above God’s will. Even children go to hell per Ezekiel chapter 9 for their unconcern.

Children are trained to give into temptations young to make deceiving businesses money, learning to go to hell young by conditionally caring based on date for holidays and birthdays by societal conformed pressure which is not unconditional love. Jesus teaches us do not adhere to the traditions of men at the cost of violating God’s law of truth in love. Mark 7:8, “Do not be conformed to the world.” I should not be conformed to the world in order to exist in the world. Romans 12:2. See, 1 John 5:19, “We know that we are children of God, and that the whole world is under the control of the evil one.” My different beliefs do not make me a threat, nor do they make me disables. The fact I care more for God, and subordinately for humanity than money, material gain and merriment makes me a Christian.

Per my pleadings, I am a licensed teacher too. Most teachers learned psychology and behavioral theories predominantly B. F. Skinner. Skinner taught there was no such thing as unconditional love, that people live based on conditional relationships (including societal peer pressure), reward and avoidance of harm. My God teaches me this is the mark of the beast, also called children of the devil, the whore, adultery with God, the lost, the unsaved, those not yet adopted by God. Christians are known by their love. Love is unconditional, not merely living conditionally by conformed behavior, relationships, reward and avoidance of harm.

Children are taught in schools that listening is love. Through conditional operant theory children learn the lie love must be earned conditionally. Accordingly, they examine whether someone earned an ear. They are discouraged from listening, learning and become dumb and blind adults, who are less likely will be saved from hell, by seeking truth in all things, rather than ignoring it. (See, Hosea 4:6, “my people are destroyed from lack of knowledge.”) Throughout the bible, we learn not knowing is guilt that damns people to hell. Christians are called to shed light to expose the temptations leading to harm and hell, not cover it up with more darkness by ignoring it. Ignorance is guilt to God. (See, Ephesians 5:11, “Have nothing to do with the fruitless deeds of darkness, but rather expose them.”)

I believe our healthcare harms lives and guarantees damnation in hell, by eliminating people’s ability to use their brain, diminishing their faculties. They feel better by feeling nothing. I believe people must use their brain, their mind, to consciously choose to do God’s will to love God and one another, not seeking happiness but holiness. I believe forced comas and drugs that inhibit people’s faculties prevent them from going to heaven, and guarantee their damnation in hell, and the damnation in hell for the unconcern of by standers. I believe the last day of people’s lives seals their eternity.

I took a course at UD on healthcare, and studied healthcare law and healthcare finance at law school, due to my own personal bad healthcare experience. per US Exhibit 43. I drafted a newspaper article outlining how to amend the laws to care for patients, as opposed to sinning by exploiting patients to serve profit. I also proposed a way to

transition into universal care. Healthcare brings in more money than any other industry in the world, wrongly exploiting desperate conditions to get as much as they can for as little as they can, at the cost of loss to health, life and eternal lives. D.I. 3, District Court Ex 6, See, <https://www.worldometers.info/>. The second most lucrative industry is healthcare marketing under the guise of education, per worldometer. D.I. 4.

Our laws reward profit and do not protect true treasures, people. Laws may be revised by legislative pen or by case law to care for humanity and improve healthcare for our elderly, the sick, and the common population without increasing monetary costs or throwing money at it, wrongly teaching money is God. Jesus teaches you cannot serve God and money. I believe those who focus on money as savior are not saved from hell regardless as to whether they are churches, businesses or not for profits practicing charity in violation of Matthew 6:1-5, which I believe leads to the sin of deception, hardness of hearts misleading many to lose eternal life to be thrown into the fire the last day. Defendants threaten me with the fires of hell.

Defendants also threatened to file a motion on November 8, 2021, to have an attorney appointed for me. I objected on religious grounds, which also shook me up. Per my Motion and Memorandum for a preliminary injunction and complaint, going into debt is against my religious beliefs.

I objected to counsel on a second religious ground as I believe God is my advocate in the disciplinary proceeding. In John 14:26, Jesus taught, “the Advocate, the Holy Spirit, whom the Father will send in My name, will teach you all things and will remind you of everything I have told you.” In Mark 13:11, Jesus taught, “Whenever you are arrested and brought to trial, do not worry beforehand about what to say. Just say whatever is given you at the time, for it is not you speaking, but the Holy Spirit.”

It is against my religion to allow an attorney advocate to defend my religious beliefs in the disciplinary proceeding. An attorney advocate is not in the position to stand up for my beliefs in the disciplinary proceeding.

With regards to the case before you, I am not so sure whether counsel would be sin. I need to pray about it. The cases relate to my religious beliefs. My beliefs are at issue. Most people believe differently, even my own family. I did look into whether they would help, and was not able to receive help due to conflicts or other reasons.

My belief in Jesus Christ, what he says, is not popular. Jesus commands us to call no one our teacher but God. I believe churches will go to hell as they mislead many there for asking other people for money to give to others, instead of merely asking for their own needs, or giving from self in secret to care for others with no worldly reward, not taking from others to give to those in alleged need, in direct violation of Jesus Christ’s commands in Matthew 6:1-5. This same religion religious violation, Matthew 6:1-5, is why I sued the democrats to run for office without violating my faith as asking for signatures or donations would compromise my beliefs, wrote the US Supreme Court concerning running for President, and is a major concern in the lawsuit I filed against President Trump, and hoped to file against president Biden by substitution.

I believe the rise in religious persecution against me and others in the country relate to the executive orders I mentioned in my complaint, creating a bought or bartered for union of government-religion, that is based on business not freedom, making my God a product to buy and sell. Per John 2:16, those who worship by business are not welcome I church or in heaven per Jesus.

This belief conflicts with the beliefs of my own family, including attorneys. It appears I must stand and fall on my faith in God alone for now.

I am also perplexed by the Delaware Supreme Court's participation, should it be based on the exercise of my First amendment right to exercise religion, speak, associate and petition. I cried about that since I look at them as potential eternal life savers, guiding the misguided with mercy and correction to prevent harm here and condemnation for eternity.

Should the Supreme Court merely care about my poverty and basic needs making the complaint to the arms of the court, instead of seeking to maliciously suppress my exercise of fundamental rights based on disdain for my religious beliefs, I would be grateful.

In that case, Defendants improperly acted. They should have waited after the case, and acted out of concern, not condemnation. I suspect the Supreme Court is defensive, and believe they seek to sue me now, for improper purposes. I am sad even thinking about the evidence indicating to their participation. Only your court can resolve this dispute.

Attached, please find my amended Motion for reargument, and a blackline thereto. Wherefore, I respectfully request this Court grant my order."²⁵

My motions for reargument at DI 20-DI 21 show additional claims and threat of compelled violations of my 1st and 6th Amendment rights leading to foreseeable emotional distress given I informed Defendants in emails of my 5th Amendment and 1st Amendment religious objections to appointed counsel, in addition to showing the court erred as a matter of fact as a matter of law creating manifest injustice in the form of loss of or threat a of loss of fundamental rights and foreseeable emotional distress.

On 12/6/21, I wrote a letter to the court showing bad faith on behalf of Defendant Patricia Swartz, with proof she lied to me to cause me to expend additional money and in an attempt to have the case kicked out. DI 29, not attached.

10. District Court denied my amended motion for a reargument under Younger. I drafted 3 motions under FRCP R. 52(b), and 59 (e) for the Court to alter and amend the judgment of the Court in its December 22, 2021 order to (1) include the availability of new evidence not available previously available, and to later the order (2) to correct a clear error of law, (3) clear error of fact, (4) and to prevent manifest injustice. I indicating my intent was cemented to add the Delaware Supreme court and the members in the 3rd Motion. I included including additional evidence and violations of my 1st, 6th and 14th Amendment rights including but not limited to lack of notice, vitiation of my opportunity to be heard, denial of an opportunity to perform discovery or call witnesses, emotional

²⁵ DI 21

distress forming in the shingles, appointing counsel despite my objection, denial of a fair impartial proceeding, which are within the scope of the appeal I reserved in my motions for reargument.

On 12/22/21 District Court dismissed my motion a second time under Younger.

On 1/11/22, the Court filed my Motion to Amend the finding of facts, and finding of law to amend the order dated 1/10/22, attached hereto and incorporated herein in its entirety with exhibits wherein I averred new facts relating to lack of notice, denial of my motion for an opportunity to perform discovery, call witness or prepare, additional claims for emotional distress forming in physical symptoms of the shingles (Attached hereto as DI 34, with Exhibits at DI 35), wherein I argued:

Plaintiff, Meghan M. Kelly, pro se, this _____, pursuant to FRCP R. 52(b), and 59 (e) moves this Court to alter and amend the judgment of the Court in its December 22, 2021 order to (1) include the availability of new evidence not available previously available, and to later the order (2) to correct a clear error of law, (3) clear error of fact, (4) and to prevent manifest injustice.²⁶

I am getting sued by the government for my faith in Jesus Christ. Defendants appear to think my worship of God instead of money and material gain is a mental disability. Jesus says you cannot serve God and money. (D.I. 20, 21). I believe people go to hell for organized charity, pro bono, fundraising, forcing individuals to work as discipline in violation of the 13th Amend., and **blindly** doing what they are told at a job for money to care for their family, while not caring to **see clearly to love God** as God, instead of money as savior and God, and not caring to **see clearly** to love others, by understanding how their product or service may harm others God loves.²⁷ 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,

²⁶ See eg. the following for standard of review, *United States v. Fiorelli*, 337 F.3d 282, 288 (3d Cir. 2003); *Max's Seafood Cafe ex rel. Lou-Ann, Inc. v. Quinteros*, 176 F.3d 669, 677 (3d Cir. 1999); *Harsco Corp. v. Zlotnicki*, 779 F.2d 906, 909 (3d Cir. 1985).

²⁷ 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)

holy, or risk losing my ability to “buy and sell” by taking my license to work as an attorney.²⁸

The trial against me is scheduled Thursday, Jan 13, 2022, days away, despite the fact I did not receive proper notice, moved to postpone the hearing, and requested an opportunity to conduct discovery to show the cause of action is illegal and to show the state does not have subject matter jurisdiction against me.

On Oct. 25, 2021, I filed a Complaint, and various motions with the District Court based on the arm’s of the Delaware Supreme Court and its agents’ or coconspirators interference with *Kelly v Trump* and retaliation against me for my exercise of Constitutionally protected activity under 42§§§ 1985(2), 1983, and 1988, including retaliation against me by seeking to disbar me for petitioning the Courts to remove a substantial burden upon my free exercise of religion under RFRA against the President for the establishment of government religion, established by *inter 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.²⁹ 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.³⁰ These entities, will not be tamed with just laws or the law of love written on the hearts of man, should the Courts not prevent or reverse the global schemes. I read the plans the *Fourth Industrial Revolution* and the *Great Reset*. (D.I. 9 at Ex. 6, 8, 9). There is a plan through unjust policies to eliminate private property and make everything and everyone no longer free, but for sale to be rented out. *Id.* Schemes may be undone by the Courts before the courts governing power is eliminated by design through privatization and automation. The Court is my hope of a hero.

On Nov. 2, 2021, this Court entered an order without considering, analyzing or providing a legal opinion on all of the relevant facts and legal arguments pleaded to *inter alias* dismiss the Case as an improper forum to determine whether the state case against me is illegal, and dismissing all motions on November 2, 2021, reaffirming such dismissal on December 2, 2021. This court cited Defendant’s 8/23/2021 letter referring to both Chancery and Delaware Supreme Court pleadings as their basis to investigate me in interference with my active case, pending before the US Supreme Court at the time. (D.I. 16, D.I. 9 at Ex. 5) (Ex. A). This Court overlooked the Defendant’s reference to the **Delaware Supreme Court’s pleadings** as the asserted reason Defendants interfered with my active case, and retaliate against me for exercising protective activity, and evidence of the Delaware Supreme Court’s participation in retaliation against me for the exercise of

²⁸ 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.

²⁹ (DI. 1-17, See especially, D.I. 4 at US Ex., Petition before the US Supreme Court, Ex. A-4 To App E, Ex. A-5 to App E, Ex 2-8 to App F., D.I. 3, with focus on District Court Ex. 11-13, 21-25, D.I. 7, Ex. 1-10).

³⁰ (D.I. 2, D.I. 3, D.I. 4, at Ex A and Ex 2 of Ex F).

fundamental rights.³¹ 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)).³²

The District Court erred as a matter of law, in violation of the procedural and substantive Due Process Clause, the 1st Amend. and Equal Protections component of the 5th Amend. based on disparate treatment relating to religious political affiliation or pro se, in forma pauperis status, by failing to provide me with the opportunity to be heard and disregarding the clear evidence which shows the Delaware Supreme Court is an improper forum to grant damages for infliction of emotional distress, injunction or nominal damages and other relief, relating to conduct its members or agents, since the state court participated in or incited the conduct which is the subject of this dispute.

The Court also overlooked the facts indicating the Delaware Supreme Court incited or participated in the conduct in interference of and in retaliation of my exercise of Constitutionally protected conduct which is the subject of this dispute, and cannot be the judge of its own relevant conduct or participation relating to this matter, where I am

³¹ (emphasis intended); (D.I. 3, Ex 13 Jan 7 petition relating to attorney fees); (D.I. 4, US Ex App B, Ex A-4, A-5, Ex A of Ex. F, referring to the complaint and two motions relating to second petition relating to attorney fees, App E and F, Briefs).

³² See, *Davis v. Jones*, 506 F.3d 1325, 1330 (11th Cir. 2007) indicates this statute only applies to the **federal courts, not state courts**. The statutes analysis is useful in a procedural due process analysis regarding impartiality and a fair trial, as applied to me. The Third Circuit in *Johnson v. Carroll*, 369 F.3d 253, 259 (3d Cir. 2004) indicates, "28 U.S.C. § 455 [is for federal judges] and not on direct precedent related to the [state] trial judge's appearance of bias." This is distinguished from my case since it dealt with Section 455(a), not section 455(b)(1) and (5)(iv) as I plead. Appearance is not enough for the Third Circuit which is praise worthy because the individual justices are concerned with actual justice, under the facts, not the marketing or popularity of justice as a business). See, *Johnson v. Carroll*, 369 F.3d 253, 259-60 (3d Cir. 2004)

"The Supreme Court held in *In re Murchison*, 349 U.S. 133, 75 S.Ct. 623, 99 L.Ed. 942 (1955), that it was unconstitutional for the same state judge, after a full hearing in open court, to punish contempt, previously committed before him while acting as a one-man "judge-grand jury" permitted under then Michigan laws. "It would be very strange if our system of law permitted a judge to act as grand jury and then try the very persons accused as a result of his investigations." 349 U.S. at 137, 75 S.Ct. 623. The Court concluded that "no man can be a judge in his own case and no man is permitted to try cases where he has an interest in the outcome." *Id.* at 136, 75 S.Ct. 623. That conclusion was based on "the basic requirement of due process" that the defendant receive "[a] fair trial in a fair tribunal." *Id.* The Court commented that although fairness certainly required "an absence of actual bias," "our system of law has always endeavored to prevent even the probability of unfairness." *Id.* The Court acknowledged that its "stringent rule may sometimes bar trial by judges who have no actual bias and who would do their very best to weigh the scales of justice equally between contending parties." *Id.* However, "to perform its high function in the best way justice must satisfy the appearance of justice." *Id.* (internal quotation marks omitted).

not only seeking equitable relief, but I sought damages for emotional distress.³³ I believe I developed the shingles as a result of this case on or around January 3, 2021 too.³⁴

The entire Supreme Court may have reviewed my request to suspend active attorney license registration fees for lawyers facing economic hardship during the pandemic, and my second request for relief relating to attorney license registration fees. De-Lapp, an arm of the court, claimed their interference with my active case, was because I petitioned the Court for relief from attorney dues.³⁵ De-Lapp, an agent of Defendants, was not going to help me. (Ex. C). I already paid the fees. They sought to gather evidence against me, to punish me for my exercise of fundamental rights, including the right to petition the court regarding attorney dues. It appears the Delaware Supreme Court justices or agents incited the arms to attack me by providing the information to DE-Lapp. I made a request for Chief Justice Collins J. Seitz, Jr. to recuse himself. *Id.* So, he did not participate in *Kelly v Trump*. Three Delaware Supreme Court Justices participated in the matter which is a source of Defendants' unlawfully motivated petition against me, Justices, Vaughn, Traynor and Montgomery-Reeves. (D.I. App A, App B); (Ex. D).

Pursuant to Federal Rules of Evidence Rule 605, "The presiding judge may not testify as a witness at the trial." I am not afforded the opportunity to ask the Delaware Supreme Court in the Board's venue or in the Delaware Supreme Court's venue to ascertain the Court's incitement and participation in the action by the Defendants. Neither is the ODC. I am not afforded a fair and impartial trial to determine the legality of the proceeding, for nominal damages, damages for emotional distress, injunctive or other additional equitable relief. The state forum does not afford a venue for the relief I seek. (Ex. E, Notice to the Supreme Courts of my objections of state court jurisdiction). Only the federal courts may afford me a fair, not fixed, opportunity to be heard. There is no guarantee of justice. Yet, injustice is guaranteed if the doors to the only fair, impartial forum, that may afford me, a party, with relief is closed due to pro se, in forma pauperis status, partiality to the state which is not permitted, or based on malicious motives such as religious political beliefs.

The members of the Delaware Supreme Court are material witnesses to the facts relating to my case and the petition against me. Pursuant to 28 USCS § 455 (b)(1) (5)(iv), "(b) [Judges] shall also disqualify [themselves] in the [if to] the judge's knowledge [he or she is] likely to be a material witness in the proceeding." Pursuant to 28 USCS § 455 (b)(1) A judge shall disqualify himself, "(1) Where he has a personal bias or prejudice concerning a party, or personal knowledge of disputed evidentiary facts concerning the proceeding." The Delaware Supreme Court members have "personal bias

³³ (D.I. 2, at pages 8-9, 12-13, 48-52, 59, 68, 70, 71-74, 101,103); (Ex. B attached, Ex. B 2, attached, evidence of harassment to intentional increase emotional distress); (DI. 3 at Ex 1, 2, 3); (D.I. 20, D.I. 21 at Ex. 2, please note I was trembling at the forced violation of my religious belief that a police officer made a wellness check, per D.I. 21. Also note the pleadings relating to the physical threats to my safety based on political-religious association or speech at D.I. 1, D.I. 4, at US Ex. A-4, A-5, US petition of writ of cert, US-Ex. 52, not attached).

³⁴ D.I. 2 page 103. I would also like to include nominal damages, to protect fundamental rights including the right to worship or not according to the dictates of our own conscience, not the dictates of the government. Since this right is more important than money, and is not something money can remedy. Freedom is not for sale by barter or exchange.

³⁵ (D.I. 9 at Ex 1, De-Lapp's letter); (D.I. 3, Ex 13 first petition relating to attorney license fees); (D.I. 4, US, Ex A-4, A-5, relating to second petition relating to license fees).

or prejudice concerning a party, or personal knowledge of disputed evidentiary facts concerning the proceeding” in the illegal as applied proceeding in state court. Id.

The facts related to the ODC’s petition arose in the Chancery and the Delaware Supreme Courts (“Courts”), and create the appearance of the Courts’ “personal bias or prejudice concerning a party [me, and]” personal knowledge of disputed evidentiary facts concerning the proceeding.” Id. The Courts through its members or staff appeared to have instigated or participated in the retaliation or/and in interference with the exercise of my access to the courts, based on discriminating against me for my religious associated beliefs reflecting in my petitions and speech. Accordingly, the Courts must recuse themselves, pursuant to 28 USCS § 455, (a), § 455 (b)(1), and § 455 (b)(5)(iv.), and the Procedural and substantive Due process Clause.

The law library also was granted PACER access by the Delaware Supreme Court which is suspicious, evidence the Delaware Supreme Court is preparing a case against me. Justice Traynor also came into the law library looking for federal jury instructions, I believe to prepare someone to sue me in federal court, which if it is true, makes a fair trial impossible in the Delaware Supreme Court. The state Court and the Board are without jurisdiction to hear my grievances for this unlawfully brought petition.

The Court erred as a matter of law, and creates manifest injustice by denying me a full and fair opportunity to be heard in violation of the Substantive and Procedural Due Process clause applicable to me, based on disparate treatment against me motivated by religious-political belief, pro se *informa pauperis* status, or overlooking the evidence, in clear error of the facts and clear error of legal arguments, blinded by partiality towards the state as opposed to the parties as equal under the law.

Since October 25, 2021, new and additional facts have arisen which must be considered by the Court to correct clear error of facts, to correct clear error of law and to prevent manifest injustice preventing me a full and fair opportunity make my case and litigate the issues.

On or about November 3, 2020, the Preliminary Review Committee met and determined a petition may be brought by Defendants against my person relating to my case *Kelly v Trump*.³⁶ Defendant indicated her desire to appoint counsel. I objected on religious and economic grounds. Despite my objection she requested appointed counsel with the Delaware Supreme Court. I filed a letter indicating I would object to appointed counsel, and another letter providing notice that I will object to the Supreme Court’s subject matter jurisdiction. (Ex. E, F). On Fri., Dec. 10, 2021, the Board signed a notice of a hearing. I was not provided proper notice on Dec.10, 2021. On Mon., Dec. 13, 2021, the Delaware Supreme Court appointed counsel despite having notice of my objection to counsel which caused me great emotional distress. On Thur., Dec.16, 2021, I received a letter regarding the appointment. On Fri., Dec. 17, 2021, counsel contacted me. I immediately indicated my objection to his appointment. On Sat., Dec. 18, 2021, I filed the attached letter with the Board objecting to improper service, requiring a postponement on the hearing so I may be afforded discovery, and a decision on counsel, and notice that I intended to file a motion with the Delaware Supreme Court on Monday.

³⁶ The Preliminary Investigative Committee can be removed from my complaint, as the injunctive relief sought is now moot. Additionally, should defendants David White and Kathleen Vavala abstain from involvement I will stipulate to their removal from the complaint, but I do not waive my one free Amendment of complaint before service to Defendants on this.

(Ex. G). On Mon., Dec. 20, 2021, I filed *Respondent's Motion for reconsideration of order dated December 13, 2021, appointing counsel despite my notice of intent to object, and objection of improper service of the Board's Notice of Hearing, dated December 10, 2021*, with the Delaware Supreme Court, with a copy to Defendant, and the Board, albeit the Board's copy was mailed Dec.21, 2021. (Ex. H). On Dec. 21, 2021, I filed the attached letter with the Court rejecting appointment of counsel. (Ex. I). Appointed Counsel moved to terminate his appointment on Dec. 23, 2021. On Dec. 29, 2021, I filed a letter motion with the Court to inter alias object to counsel on 6th Amend. Grounds and postpone the hearing in the interest of justice. (Ex. J). The Court excused counsel.

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

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

I have not received a response. The scheduled hearing is in less than 4 days. I did not receive proper notice, and have not received a response regarding discovery or postponement of the hearing. This is not a fair proceeding. This is punishment, to bend my will to conform to the state's worship of business greed at the cost of selling my soul to hell, a cost too great. My faith in Jesus teaches me not to be conformed to the world. The Constitution allows me to hold religious beliefs different from the state. The Constitution protects me from government retaliation for my beliefs, speech, association and petitions relating to my religious beliefs.

This Court must deny me an opportunity to be heard and a fair trial. No one is above the law. No one is below the Law. The constitution is under attack, and the United States needs you to uphold the limits on government that make us free, above procedural and statutes, or our union may dissolve. The world is on your shoulders, not in your hands to mold, but requiring you bear the burden of reading my religious thoughts and petitions, even if you disagree and do not understand my faith in Jesus Christ. You are free to believe differently than I, but you are required to uphold the constitution to protect those with diverse beliefs from mob lawless reign of lusts, with the rule of law. No one is below the law, even a peon like me. You strengthen our faith in equal access to the courts without disparate treatment in violation of the Equal protections component of the 5th amend. by opening the doors of the court to all people, regardless of poverty, religion, race, place of origin or association. You prevent people from taking justice in their own hands through misbehaving might makes right thinking, when might makes wrong. Please hear me your honor. It is the opportunity at justice, not guarantee I seek. WHEREFORE, I respectfully request you amend findings of fact, alter the order, dated December 22, 2021, based on new findings of fact, to prevent clear error of facts, clear error of law, and to prevent manifest injustice."

On January 18, 2022 I drafted and signed *PLAINTIFF'S SECOND ADDITIONAL MOTION PURSUANT TO FRCP R. 52(b), 59(e) and 60(b)(1)(2)(6) TO AMEND FINDINGS OF*

FACTS AND ALTER THE ORDER, DATED DECEMBER 22, 2021, BASED ON NEW FINDINGS OF FACT, TO PREVENT, CLEAR ERROR OF FACTS, CLEAR ERROR OF LAW, AND TO PREVENT MANIFEST INJUSTICE, filed January 19, 2022 and attached hereto with table of contents albeit I was not able to attach Exhibits M, N (hereinafter “2nd Motion”), DI 39.

I attached documents, the records and other relevant items from the Delaware Disciplinary proceeding and incorporated it therein in the 2nd Motion I averred:

1. I also am providing notice that I will likely, to my chagrin, amend my complaint to include the Delaware Supreme Court as a Defendant and individual judges for nominal and equitable relief.³⁷ The Supreme Court incited, participated or caused the unlawful retaliatory state Court proceeding and the Delaware Supreme Court arms’ interference in my lawsuit *Kelly v Trump* on violation of 42 USC Section 1985(2). Whether the Delaware Supreme Court’s report to DE-Lapp was out of concern for poverty or a malicious purpose is in issue. A complaint was made apparently by the Supreme Court or its agent based on my petition for relief from attorney dues to the arm’s of the Court. (Ex.1st A). De-Lapp, an arm of the state court, would never have attacked me, but for this petition relating to lawyer license dues, per their own admission. (D.I. 3, District Court Exhibit 13, D.I. 9, Exhibits 1, 2, 3). The Delaware Supreme Court did not grant my petition, and ignored my second petition, deeming me unworthy of the opportunity to be heard on relief from attorney dues, in potential violation of the substantive and procedural due process clause, and in violation of the Equal Protections Clause of the 14th Amend. as applied to me, a party of one, for disparate treatment motivated by my poverty, religious beliefs or exercise of fundamental rights. This Court overlooked the Delaware Supreme Court’s apparent incitement of the unlawful proceeding against me in state Court by its arms, brought to punish me, but for, my exercise of Constitutional rights. I desire to protect the Courts, to protect those I seek to correct in this case. I am sad your honor did not enjoin the state proceeding to date, forcing me to add the Delaware Supreme Court and its members. My hope of a hero to preserve our union and to make it more just and freer is with the Courts.

2. I am getting sued by the government for my faith in Jesus Christ. Defendants appear to think my worship of God instead of money and material gain is a mental disability. Jesus says you cannot serve God and money. (D.I. 20, 21). ((Ex. A), Email to Defendants regarding my religious beliefs since my religious beliefs are in question), also see (Ex. C, Ex D, Ex. Ex. E, internal Ex. F, H, I).

3. I am making this Motion in addition to, not in amendment of or in replacement to the previous motion (also referred to “M1”), I made seeking similar relief, albeit with additional facts which must be included to prevent clear error of fact, of the

³⁷ “I respectfully request to include nominal damages should the Court allow amendments to the complaint. See, *Freedom from Religion Found. Inc. v. New Kensington Arnold Sch. Dist.*, 832 F.3d 469, 490, 2016 U.S. App. LEXIS 14594, *49-50. Also see, *Molina v. Pa. Soc. Serv. Union*, 2019 U.S. Dist. LEXIS 120040, *27, 2019 WL 3240170.

law and to prevent manifest injustice. Since, I filed that motion served to the Court and Defendant via US Mail on 1/10/21, new and additional facts arose which must be considered by this court to prevent manifest injustice.

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

5. **On 12/29/21**, I also served a letter with exhibits with both the Delaware Supreme Court and Defendant Board notifying them,

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

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

7. I have not been afforded a fair opportunity to prepare a defense, research, gather evidence, and facts and file motions I noticed the Board and Court I intended to file, after a fair investigation was allowed in conformity with the standards of Constitutional due process, 1. to dismiss the petition based on illegality of proceeding and 2. a separate motion to dismiss based on lack of subject matter jurisdiction due to the Supreme Court's participation in inciting the petition against me, but for the exercise of my Constitutionally protected rights.

8. I repeatedly, checked on the status of my motion to postpone the hearing, and opportunity to prepare a defense, and only heard back on 1/10/22. The Board indicated the hearing was on schedule for 1/13/22. (Ex D at internal Ex. B).

9. On 1/11/22, I filed *Respondent Meghan M. Kelly's Emergency Objections and Emergency Motion* filed with both the Board of Professional Responsibility for the Supreme Court of Delaware, and the Delaware Supreme Court, simultaneously, to postpone the hearing against me to prevent manifest injustice to afford me an opportunity to perform discovery, potentially call witnesses and prepare a defense for the state's allegedly illegally motivated petition against me for my exercise of fundamental rights,

motivated by the state's disdain for my religious political beliefs, dated 1/11/22. (Ex D incorporated in total)

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

11. On 1/11/22, the Delaware Supreme Court swiftly granted an order denying relief based on jurisdiction. (Ex. E Internal-Ex. B).

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

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

14. On 1/11/22, the Board granted an order postponing the hearing for eight days **due to alleged illness**, a reason not included in my motion. (emphasis intended) 6(Ex. E Internal-Ex. B). The Board was aware I was not feeling well when I immediately notified them, I was not feeling well, a week earlier. (Ex. E, internal Ex J, and Ex F).

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

16. I notified the Board and ODC of my opposition to examination by health or mental health professionals based on religious objections in my Answer to the petition, and through E-mail, despite the ODC seeking to tempt me to include such an argument in a motion. (Ex. E. at Internal Exhibits G, H, I, L, M), (Ex F).

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

18. Despite having knowledge, I have been under the weather, needed time to research, perform discovery, and prepare a defense, including the defense of lack of subject matter jurisdiction, and illegality of proceeding, as applied, was not heard on outstanding motions, including a motion served on 12/18/22 via mail to postpone the hearing for opportunity to perform discovery and to file motions, and a motion relation to my religious objections against being observed or examined by a health or mental health professional served via US mail, courtesy copy to the Board and ODC via E-mail on 12/31/22 , and desired to file additional motions, including a motion to dismiss based on lack of subject matter after collecting evidence for clarity, the Board denied rendering an order on my 12/18/21 motion to postpone the hearing. Instead, the Board did not respond

to previous week's status update requests, or the Dec. 2021 status of receipt and update requests. The Defendants ignored, and did not afford me an opportunity to be heard on past motions in violation of the substantive and procedural due process clause, and possibly in violation of the equal protections clause as applied to me, by treating me disparately based on religious beliefs, in contravention to the norms of a fair proceeding. (Ex. E, Ex. L)

19. On 1/12/22, I appealed the Board's Order by filing *Respondent Meghan M. Kelly's Motion Appealing the Order of the Board on Professional Responsibility of the Supreme Court of the State of Delaware dated, January 11, 2022, granting postponement of the hearing for 8 days due to illness, not a reason identified in her motion to grant postponement to afford her opportunity to prepare a defense, perform discovery, research, file motions, be heard on outstanding motion(s) unaddressed by the Board, to defend her exercise of fundamental rights and to preserve her license to practice law, on the grounds the amount of time is not enough and a hearing date should be postponed until after a fair opportunity to build a defense*, dated January 12, 2021. (Ex. E incorporated herein in total).

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

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

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

23. So, I made a motion, once again to suspend the hearing date, to call witnesses, and perform discovery for my defense of exercise of fundamental rights without the state's punishment for my exercise. I have the right to believe, think and exercise my faith differently than the majority. Individual liberties, such as my right to an impartial proceeding, an opportunity to be heard, adequate notice, opportunity to perform research and a defense without disparate unfair treatment, motivated by the state's disdain for my religious beliefs, are protected by Constitutional Law from government backed mob reign of controlled, conditional, conformed lusts. I am not sitting on this, but am acting in haste to protect and assert my Constitutional rights to prevent waiver.

24. On 1/15/22, I filed a motion for immediate emergency relief, and a new motion with the Board, attached hereto, and incorporated herein in total, *Respondent's more particularized motion to suspend the hearing, scheduled for January 21, 2022 to allow me opportunity to research and prepare a defense, requesting opportunity to draft requests for admission, interrogatories and subpoena opposing counsel, Patricia Swartz, as a necessary witness in her defense, and subpoena other necessary witnesses, including but not limited to, Chief Justice Collins J. Seitz, Judge Kenneth S. Clark, Jr., due to his admission he interrogated me based on my exercise of fundamental rights incited by the*

ODC, and Arline Simmons, to show unconstitutional motive for this petition, to allow, the accused, respondent an opportunity to defend herself on the defense illegality of proceeding, as applied to her, motivated by disdain by the state for her religious associated beliefs and exercise of fundamental rights, and lack of jurisdiction based on the Delaware Supreme Court's apparent participation in inciting this petition against respondent.

25. There are only 3 business days before the rescheduled hearing. I informed Defendants I am not ready, and need time to prepare a defense, to subpoena witnesses, to perform legal research and to draft motions based on additional facts found in discovery. The Defendants fail to grant me a fair opportunity to build my defense, despite my multiple requests in contravention of conformity with the requirements of a fair proceeding under the Due Process Clause. There is no legitimate or important reason for Defendants to rush this matter at the cost of eliminating my right to an opportunity to prepare a defense and at the cost of creating an unfair proceeding in violation of the substantive and procedural Due Process Clause and the Equal Protections Clause of the 14th Amend.

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

27. "Congress, the Executive, and the Judiciary all have a duty to support and defend the Constitution." *Salazar v. Buono*, 559 U.S. 700, 717 (2010). Defendants act above the law, and declare me below the law, by denial of Constitutional protections, motivated by disdain for my religious beliefs and poverty.

28. I will suffer continued irreparable harm if I am unable to gather testimony and facts to provide a defense of dismissal of the petition, based on subject matter and illegality of proceeding, as applied, under the facts of the case, to chill the exercise of my fundamental rights, thereby chilling the rights of others by such unconstitutional precedent. "The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury." *Mullin v. Sussex Cnty., Delaware*, 861 F. Supp. 2d 411, 427 (D. Del. 2012); Citing, *Indian River Sch. Dist.*, 653 F.3d at 283 n. 14 (quoting *Elrod v. Burns*, 427 U.S. 347, 373, 96 S.Ct. 2673, 49 L.Ed.2d 547 (1976)).

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

30. The right for the opportunity at justice is not a guarantee. It is the right to petition the Courts, without state punishment, that must be protected. Otherwise, only the Courts may selectively apply who has rights or not in violation of the Equal Protections Clause.

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

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

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

35. I have not sold soul to hell in exchange with the license to practice law.

WHEREFORE, this court must amend findings of fact, alter the order, dated December 22, 2021, based on new findings of fact, to prevent clear error of facts, clear error of law, and to prevent manifest injustice." DI 39, 3DI 155

I specifically advised opposing counsel and the court I would seek to amend the complaint to add the Delaware Supreme Court and its members as Defendants in the 2nd Motion. I specifically told the court I seek damages citing to case law supporting monetary damages, and I averred new facts causing additional irreparable injury, irreparable harm, additional violations of Constitutional law and claims in the 2nd Motion.

I filed *PLAINTIFF MEGHAN M. KELLY'S 3rd EMERGENCY MOTION PURSUANT TO FRCP R. 52(b), 59 (e), 60(b)(1)(2)(6), and 65* (hereinafter "3rd Motion") by mail and I actually hand delivered it by driving the 4 hour round trip in hopes to prevent irreparable injury it on my birthday January 19, 2022. So it appears on the record twice at DI 36 filed on January 19, 2022 and DI 41 on January 21, 2022, attached hereto and incorporated herein.

39. In 3rd Motion I averred:

"1. Since yesterday, January 18, 2022, after I served a second emergency motion pursuant to pursuant to FRCP R. 52(b), 59 (e), and 60(b)(1)(2)(6) additional facts must be presented and considered by the court to prevent manifest injustice, and to allow for relief this court Plaintiff already requested pursuant to FRCP R. 65 in her motions for a preliminary injunction and temporary restraining order. (D.I. 6, 7, 8, 9, 10, 11, 33) (Ex. A, Return receipt of January 18, 2022 motion served to the court).

2. The Defendant Board rendered a decision, attached hereto, denying me of the right to subpoena witnesses, cross examine witnesses, and present evidence, by denying her ability to collect the same, in defense of my exercise of fundamental rights without state interference and punishment by bringing the petition against me, but for my religious beliefs and exercise of fundamental rights including the freedom of conscience to think, believe, exercise religious beliefs, speak based on her beliefs, petition the courts, and associate. (Ex B, informal decision along with critical emails)

3. The State has brought a petition against me for my faith in Jesus Christ. Defendants appear to think my worship of God instead of money and material gain is a mental disability. Jesus says you cannot serve God and money. I believe people go to hell for organized charity, pro bono, fundraising, forcing individuals to work as discipline in violation of the 13th Amend., and **blindly** doing what they are told at a job for money to care for their family, while not caring to **see clearly to love God** as God, instead of money as savior and God, and not caring to **see clearly** to love others, by understanding how their product or service may harm others God loves.³⁸

4. On December 13, 2017, the Delaware Supreme Court appointed counsel despite having notice of my objection.

5. I experienced emotional distress relating to this government compelled violation of my religious belief and filed a number of papers before the Delaware Supreme Court granted me permission to represent myself on December 30, 2021.

6. Prior to that date, I filed a motion for time to prepare a defense, research and perform discovery to determine which witnesses to call.

7. I followed up numerous times with the Board on the status of my motion, but it was not until January 10, 2022, that an indirect determination was made. The Board ignored my motion, escaping an appealable order to deprive me of an opportunity to be heard in violation of the substantive and procedural due process clause, arguably basing their disparate treatment towards me, by partiality towards the state, demeaning my religious beliefs, religious exercise and exercise of the right to petition, and associate and speak, as unworthy of protection in violation of the Equal Protections Clause, and the Due process and substantive due process clause of the 14th Amend. (Ex B).

8. On January 11, 2022, I filed an emergency motion, simultaneously with the Board and Delaware Supreme Court, appealing the refusal of the Board to afford me an opportunity to prepare a defense, gather facts, research and perform discovery.

9. The Delaware Supreme Court denied my appeal, since the unofficial decision rendered by the Board maliciously designed to prevent a fair opportunity for me to be heard and appeal, was not deemed a final appealable order by the Delaware Supreme Court.

10. The Board rendered an order later on January 11, 2022.

11. Without delay, I appealed this order with the Delaware Supreme Court on January 12, 2022.

12. The next day, January 13, 2022, I filed a motion for an emergency immediate decision on my January 12, 2022 appeal.

13. The following day, January 14, 2022, the State brought an answer to a motion rendered moot to harass and distract me, knowing I argued I did not have enough

³⁸ (Emphasis intended, See, *Jn.* 12:40, *Lk.* 11:34)

time to prepare and present a defense, with no opportunity for discovery or to call witnesses.

14. The day after that, Saturday, January 15, 2022, I served a different motion with the Board to call specific witnesses, requesting subpoenas, and additional time to send Requests for admissions and interrogatories to Defense Counsel, which are necessary for my defenses to this case, the illegality of the proceeding as applied, motivated by the state's desire to punish me for my exercise of protected conduct in contravention to the First Amendment applicable to the State pursuant to the 14th Amend., and in violation of the Equal Protections Clause by disparate treatment towards me based on my religious beliefs and poverty, deeming me unworthy to be heard and unworthy of other Constitutional rights.

15. Immediately after the holiday weekend, two business days after my appeal, on Tuesday, January 18, 2022, the Delaware Supreme Court denied my appeal, which was based on protecting my fundamental rights. (Ex C., attached Order, dated January 18, 2022, Ex D, prior Order of the Supreme Court, dated January 11, 2022, Ex F, prior order of the Board, dated January 11, 2022).

16. My defense of subject matter jurisdiction is based on the Delaware Supreme Court's participation in inciting the illegal proceeding, as applied.

17. On my January 15, 2022 motion filed with the Board, , I noted the court's apparent participation, and the need to cross examine Chief Justice

18. The Court maliciously indicated, indirectly the right to a fair, impartial, opportunity to be heard, opportunity to defend basic liberties was somehow frivolous, to allow the lawless reign of lusts, their will be done, instead of honoring the Constitutional protections afforded to me, the least of these, in violation of the Equal Protections Clause, and substantive and procedural due process clause. (Ex. C)

19. The Delaware Supreme Court is depriving me of an opportunity to be heard and a fair trial. The Board denies me the right to prepare a defense, to subpoena witnesses, and cross examine necessary witnesses. This is not a lawful proceeding. This is my hanging but for my belief in Jesus the Christ. I am in great immediate danger.

20. The Court indicated it would not hear any frivolous motions, giving a colluding sign to the Board not to file an official order, to prevent my opportunity to be heard on appeal.

21. On January 18, 2022, the Board rendered a decision, while not placing the decision in an official Order with the intent to deprive me of the opportunity to be heard on appeal. (Ex. B).

22. An unlawful secret proceeding is scheduled against me on Friday, January 21, 2022, with the purpose to punish me for exercising my religious beliefs, speech defending the exercise of such beliefs without government sponsored burdens, and petitions relating to my exercise of fundamental rights, and my associated rights as a Christian, as an American and as an attorney to believe in Jesus Christ without compromise, and without sacrifice of fundamental rights or my license to practice law. (Ex B)

23. The Supreme Court appears to be conspiring with Defendants to punish me in violation of 42 USC Sections 1983, 1988, and in potential violation of 1985(2), with intent to harass and interfere with my assertion of Constitutional rights, by depriving me of a fair opportunity to be heard.

24. The Court and its members must be included on the Complaint as necessary Defendants, including Chief Justice Collins J. Seitz, Jr., Justice Traynor, Justice James T. Vaughn, Jr., and Justice Tamika R. Montgomery-Reeves. The latter three reviewed and rendered orders in *Kelly v Trump*. I seek equitable relief and nominal relief for deprivation of my constitutional rights.

25. I am grateful I informed the Court of my intent to add the Delaware Supreme Court and its members as Defendants, prior to receipt of the January 18, 2022 state Supreme Court order by service of my Motion, *Plaintiff's Second additional motion pursuant to FRCP R. 52(b), 59(e) and 60(b)(1)(2)(6) to amend findings of facts and alter the order, dated December 22, 2021, based on new findings of fact, to prevent clear error of facts, clear error of law, and to prevent manifest injustice*, incorporated herein by reference in its totality.

26. My intent is now cemented by the great injustice towards me, and injustice towards all Americans by disparate selective application of who is worthy of Constitutional rights, by denial of my rights merely because they disagree with my personal beliefs.

27. In America I am free to believe differently, even have beliefs others find repugnant, or unsound. In America I should be free to worship Jesus Christ without sacrificing fundamental rights, and without sacrificing my paid for active license to practice law.

28. On October 26, 2021, I asked a Court representative, Renee Buskirk, to ask the Chief Justice whether he filed a complaint against me to get De-Lapp and the ODC, in hopes to get an affidavit to prevent the need to subpoena the Chief Justice as a witness. (Ex. B)

29. To my horror, I discovered Renee appeared to work for Defendant, ODC, as I later discovered her on an email with the Defendants. (Ex. F)

30. The Defendants knew of my desire to question Chief justice and other witnesses. I asked for opportunity to perform discovery in hopes to gain answers in a gentler form than subpoenaing witnesses. (Ex. B) However, with the recent denial of the Board on January 11, 2022, and denial of the appeal to the Supreme Court, dated January 18, 2022, I had no choice but to act in presumptive haste by filing a motion on January 15, 2022 to subpoena witnesses to cross examine during the state court hearing.

31. The Delaware Supreme Court's assertion relating to ignoring frivolous appeals, while not calling the appeal frivolous is a signal for the Board not to render an order so as to deprive me of the opportunity to be heard on appeal.

32. The Delaware Supreme Court's assertion that having an opportunity to prepare and present a defense based on 1. illegality of proceeding as applied, and 2. lack of subject matter jurisdiction, due to its own incitement or participation in inciting its arms of the court to attack me, but for the exercise of fundamental rights, is unworthy of consideration, is clear evidence of its inability to be impartial in my case.

33. I object to the illegal proceeding as applied. I object to the deprivations of my substantive and procedural due process rights, as applied to me by denying me opportunity to research, collect evidence and prepare a defense. I objected to lack of notice and the form of notice provided as insufficient by the Board for any hearing. I objected to the denial of my right to cross examine and present a defense in violation of the 6th Amend.

34. The State must meet strict scrutiny to overcome any of my objections, which it cannot meet, rendering these violations of my Constitutional rights inexcusable.

35. I am incredibly disappointed in the lawlessness exhibited by the state.

36. I also objected to the closed proceedings, and requested the proceeding be conducted in open court to protect me from secret, concealed collusion from the state to let their will be done, instead of applying limitations on the state with the rule of Constitutional law.

37. On January 18, 2022, I filed a different motion with the Court, the Court is scheduled to receive today with information that I include and incorporate herein by reference in its totality.

38. I do not waive my motions to exemption of PACER fees, but am filing this now, so as not to violate a greater sin against God by failure to assert my rights. Not all sins are weighted the same per Jesus the Christ. (*Matthew 23:23*). Injustice in the courts is damnable per God, by loving costs, convenience and comfort more than God or one another. (*Amos 5:15*); (*Also see, Isaiah 10:1-2* “Woe to those who enact unjust statutes and issue oppressive decrees, to deprive the poor of fair treatment and withhold justice from the oppressed.” Whenever God says “Woe to you” I believe it means damned to hell are you should you not repent by unhardening your head and unhardening your hearts to love to overcome lusts that lead to the second death.).

Wherefore I pray the Court grants my motion to appeal and immediately reconsiders my motions for a temporary restraining Order and preliminary restraining order to enjoin the hearing scheduled January 21, 2022.”

11. I filed a Motion to Amend my Complaint was as a matter of right, but accidentally did not mail out the signature page. I moved the court to amend my complaint as a matter of right to conform the complaint to the facts of the case in a rolling Motion. DI 58, and continuously moved to add new evidence reserving my right.

I averred facts where Delaware Supreme Court members and Defendants violated my right to notice, a fair opportunity to be heard, the right to subpoena witnesses, perform discovery, prepare and other Constitutional rights and caused others harm. I indicating my intent was cemented to add the Delaware Supreme court and the members in the 3rd Motion.

On 1/19/22, I filed an emergency motion to expedite consideration of Motion to amend findings of fact and the order with exhibits from the DE Disciplinary case showing irreparable injury. DI37, DI 41. (I drove the 4 hour round trip in addition to mailing it to prevent irreparable injury)

On 1/24/22, I filed a Motion to amend the Complaint once as a matter of right under FRCP Rule 15 to add additional claims arising since the inception of the Civil rights case and to add the DE Supreme Court as Defendants for violations of notice, procedural due process, First Amendment, 6th Amendment, emotional distress forming into the shingles, denial of a fair opportunity to defend my life and liberty, denial of my opportunity to call witness, and I attached pleadings in the state disciplinary proceeding to the previous submitted motions, and yet new and additional claims continue to arise since then. DI 43

It appears the signature page was missing as a desperately acted to file it. So, I mailed out a second copy to Defendants' counsel. DI44. I did not have access to view ECF by free glance at this time. So, I did not know the signature page was missing from the District Court. This may have been why the District Court did not address DI 43 in any of its orders.

On 2/14/22, I mailed a Second Motion for a preliminary injunction, with a waiver of bond with the threat of new irreparable harm, and new injuries, Constitutional violations, objections to the Court reporter's inaccurate report, and other relevant facts. DI 47. I reserved my right to object to the court reporter's inaccurate prejudicial transcript beyond my objections included as exhibits herein. Id, Also see DI 77-79. App X, incorporated herein in its entirety.

On 2/14/22, I filed a *Motion to expedite, Plaintiff's Motion for an urgent Emergency preliminary restraining order to be applied immediately, with a waiver of bond, to prevent immediate and irreparable injury by compelled violations of my religious beliefs, but for the exercise of religious beliefs*, along with a Memorandum in support of this Motion. (DI 48,49)

On 3/10/22, I filed a letter stating:

I am following up on my Plaintiff's Motion for an urgent emergency preliminary restraining order to be applied immediately, with a waiver of bond, to prevent immediate and irreparable injury by compelled violations of my religious belief, but for my exercise of religious belief, dated February 13, 2022, filed February 14, 2022.

The filing deadline for Defendants has expired. I respectfully request you make a determination on the papers because I am in immediate danger of irreparable harm.

The Clerk of Court confirmed on February 22, 2022, the entire Court reviews petitions relating to attorney dues, and reviewed my petitions. It appears the Delaware Supreme Court did in fact incite DE-Lapp's interference to impede my case in Kell v Trump. If you recall, De-Lapp's interference was based on my petitions to the Delaware Supreme Court for relief on attorney dues.

The Delaware Supreme Court also colluded with the Defendants, and the Board of Professional Responsibility for the Supreme Court ("Board"), by denying me a fair hearing, by denying me an opportunity to prepare and present a defense, and by colluding with the Board by denying me an opportunity to appeal until my Constitutional rights under the Procedural Due Process Clause of the Fourteenth were already violated.

The Board has already made its recommendation, and I am working on objections to submit to the Delaware Supreme Court. There is not much time for this Honorable Court to prevent irreparable injury to me.

In its recommendation, the Board accuses me of disloyalty to the law because I sued President Trump to uphold my Constitutional right to free exercise of religion, without government substantial burden for such exercise, by dissolving the establishment of government religion. (Exhibit A) [the Board speaks of loyalty to associations and organizations not the rule of law]

Upholding the Constitutional limits upon government agents, not the lawless, lustful desires of government agents, is loyalty to the law, as opposed to leaders in positions who violate the law. Holding the President, and government agents, including the Defendants, to the law, to the Constitutional limits on their authority, helps government leaders better serve their people. Upon request, Court's have a duty to guide misguided government agents, such as the President and other government agents by exercising their most important Constitutional check to balance out the other branches.

The Board ignored some outstanding motions, dated December 18, 2021, December 31, 2021, January 15, 2022, January 25, 2022, and January 31, 2022, while rendering two orders in E-mail, non-appealable form to evade my right for an opportunity to be heard on appeal. (Please see attached, Exhibits A and B, and look at email rendered decision of the Board.)

The Delaware Supreme Court refused to consider orders until it was too late to prevent the irreparable loss of my right to a fair proceeding by denying an opportunity to perform discovery, subpoena witnesses, prepare and present evidence by cross examining witnesses at a hearing by indicating it would only consider any Board's orders after the hearing was conducted and a report was rendered. (Exhibit C)

The Court stated:

'The decisions of the panel chair or panel may not be appealed before submission of the panel's final report and recommendation to the Court for review.

Respondent will have an opportunity to object to the report and recommendations as well as prior rulings of the panel chair.'

The Supreme Court evaded allowing me an opportunity to be heard on appeal until it was too late, and my Due Process right for an opportunity for a fair hearing, with

witnesses, and discovery was already violated. Therefore the Court encouraged or supported Due process violations against me in the hearing before the Board.

The Supreme Court caused additional alarm by their reference in the footnotes of the Court's Order to a separate proceeding regarding incapacity....

I have religious objections to being examined by mental health and healthcare professionals. I believe people are thrown into the fires of hell for blindly trusting mental health experts as authority, as guides or God, in place of using their own brain to critically think, to know, in order to love humanity, not sacrifice humanity for money and material gain.

Please note, I was required to think outside of the box to force the Board to render a decision as they sat on my motions by filing it with both the Board and the Court. The Board made a decision. I appealed the decision to Delaware Supreme Court, and made another motion to the Board on January 15, 2022, which you have in my other filings.

The Delaware Supreme Court wants my head on a platter, but for my religious beliefs, and denied me the opportunity to perform discovery, subpoena witnesses, prepare and present a defense by claiming my opportunity to prepare and present a defense [in the Board's new order] was a frivolous request to appeal in a second order labeled as Exhibit D...

The Delaware Supreme court violated my opportunity to be heard on appeal in the state proceeding, and appeared to make its decision on my defenses before I was afforded an opportunity to be heard by rendering them frivolous.

The fact the DE Supreme Court noted my appeal for due process violations, preventing me the opportunity to prepare, subpoena witnesses to deny me of a right to a fair trial by affording me opportunity to present a defense was frivolous, shows they already made a decision on my defense before I was afforded a fair opportunity to be heard, or even a hearing."

Please enjoin this matter.... There is no subject matter jurisdiction when the Courts violate the Fourteenth Amendment Due Process Clause by an unfair trial. This case is different because the Court overseeing my case appeared to incite the case against me and participated in denial of opportunity to be heard in violation of the substantive and procedural due process cause. It is manifest error to deny me justice by delaying justice before it is too late." (DI 51) App V

On 3/29/22, I drafted a letter to the Court regarding the emergency 2/14/22 TRO, Preliminary injunction and emergency motion and notice of new immediate danger of compelled violations of my religious beliefs, with an outline of the documents filed in the Delaware Disciplinary proceeding, excluding other exhibits. DI 53. App. W, App X

On 4/4/2 I drafted a Second Motion for an exemption to appear in person and to appear remotely by phone, since I placed my tags with the DMV since auto insurance was unaffordable and debt is against my religious belief.. DI 54. I filed attachments thereto including evidence 91

now more central banks will take over the court's function by reign by the mark of the beast to eliminate the government.

On 4/14/22 I filed a letter with exhibits showing I was denied access to the law library, and the Supreme Court refused to docket my exhibits on public record in violation of my right as an accused for a public proceeding, and a fair and full proceeding to appeal to the US Supreme Court, where I averred inter alias,

“The Clerk confirmed she would take my physical exhibits and scan them in prior to their due date. The filing of exhibits is material to my case to show, in part, the Board of Professional Conduct, (hereinafter, “Board”), the Delaware Supreme Court (“Court”) and Defendants colluded and continue to collude, in conspiring to deny me the opportunity to be heard, in fact denied me a fair and impartial opportunity to be heard and ignored and did not address various motions, including but not limited to motions dated December 8, 2022, December 31, 2022, January 13, 2022, January 15, 2022, and January 31, 2022.

Then in bad faith, with intent to harass me, and fix the proceedings below, the Board had the audacity to claim I sat on my rights in their report when they sat on my motions and denied my requests **two days** before the r=hearing and rescheduled hearing. They sat on my pleadings twice, both times delaying in bad faith with the intent to prejudice me, both times affording me merely two business days before the scheduled proceeding to respond....”

The Board sat on my motions, in bad faith with unclean hands to ignore or deny “DI 55.

The State Court would not even allow me to self-represent until about two weeks before the hearing giving notice prior to a holiday Christmas weekend, where I would not be able to subpoena the hidden witnesses with 10 days of advanced notice.

On 4/21/22, I filed a letter with the District Court regarding my religious beliefs and parts of the global sustainable plan that violate them. I also include exhibits I incorporate herein by reference. DI 56.

On 4/26/22, I moved to amend my complaint under a rolling motion to include inter alias Constitutional arguments against disciplinary rules, including Rule 13 and 14, to add new and additional facts and claims, and to prevent additional injustice prior to the Court's order on my 3

Motions for reargument. I sent the attached letter, along with three videos to be used as evidence on a memory stick noticing the court of my intent to amend the Complaint to contest the Constitutionality of the Disciplinary rules. I also had other Constitutional arguments on the record concerning the Constitutionality of the proceeding including but not limited to arguments contained in two motions filed in the DE Disciplinary proceeding attached hereto at Exhibits T, T-2, T-3, T-4, and more, excluding other arguments I reserve the right to assert against the rules like the compelled violation against the 5th Amendment right against self-incrimination of disability or discipline under the threat of separate penalty in the Delaware and Federal disciplinary rules, should this be remanded and include an additional arguments.

I included more facts on the record before this Court and the Third Circuit showing to my horror the DE Supreme Court participating in removing two witnesses from the Chancery Court staff to prevent their testimony while specifically ignoring my motion for time to subpoena one. I would have had a hard time subpoenaing Arline Simmons because she was no longer with the court. I also discovered the entire Supreme Court members appeared to have incited the state attacks against me in *Kelly v Trump*, not merely Chief Judge Seitz. Lisa Dolph indicated the entire court not merely one member reviewed my motions for relief relating to bar dues.

On 4/26/22, I filed a letter regarding a running motion to allow the complaint to be amended to reflect the facts, two material witnesses in my favor were secretly concealed and eliminated. Both Court staff Katrina Kruger and Arline Simmons were compelled to retire to conceal their testimony in my favor. Defendants concealed they retired during the proceeding and denied me time and an opportunity to call them to conceal the Brady, bad faith violations. I also supplied a memory stick containing.

1. Video where I spoke at a Democratic function, showing I misbehaved by accepting donations from the Democratic party before I learned how it caused

oppression and injustice per Jesus the Christ's teachings in Matthew 6:1-4. I sinned and I am sorry your honor.

2. Video of a vulture that was pecking at the window that was not scared of me despite yelling at it in the winter of 2022.

3. Video of me on TV in the news complaining of rats in my dorm apartment from a Christian School Duquesne Law School.

4. Pictures of Judge Hardiman and me in law school, to show my personal connection to argue he should not be assigned the case should he be chosen due to potential partiality.

5. Pictures of me attending a Democratic function, misbehaving, when I should have been available to all people, regardless of party to prevent conditional conformity with the party's agenda, which prevents unconditional love and service for all citizens, regardless of each individual's position and party affiliation.

6. Video of me lamenting about how Nancy Pelosi and congress people misbehaved by failing to impeach. Nancy Pelosi remarked on respecting the flag when she transferred the articles for impeachment, placing her hand to my face on my article of impeachment to safeguard the NFL player's freedom to associate and speak out on alleged disparate treatment towards Black Americans in the judicial system. Our officials put on a deceptive horse and pony show, feigning concern on government racist persecution of the people. They do not seek justice for the oppressed as I asked them to. They misbehave, and are need of Court correction and guidance.

7. PDF's of the pleadings I filed against the democrats, suing them without violating Jesus Christ's teachings by asking for donations or signatures, which I believe damns people to hell. I would be a bad leader if I encouraged conduct that harmed people in this life and damned them to hell forever your honor.

8. I also attached some of my marketing material so you can understand my heart, but I feel dirty. Government is a service not a business. Officials should be elected not based on appearance or popularity but based on their heart. The people should vote on their ideas not appearance. Jesus teaches us judge correctly, not based on appearance. The title marketing appears naughty to me, your honor" DI 58.

Later the same day, April 26, 2022, the District-Court entered an order denying my three outstanding motions while not considering this evidence on the record of my intent to amend my Complaint once as a matter of right under a rolling motion to include Constitutional arguments on rules, and the fact the DE Supreme Court actually copied the Defendants in response to my request to be excused from the notary requirements showing they actually incited the

interference in Kelly v Trump. The Court never ruled or considered the motion to amend my complaint on January 24, 2022.

Since then, I moved to amend the complaint with additional legal arguments, facts causing manifest injustice, sought a rolling motion to amend thrice or more times to move the court to permit me to amend the complaint to include additional ever arising evidence, facts, harm, claims to prevent manifest injustice. (DI 61, 62, 63, 64, 65, 66, 69-75, 77, 80, 81, 82, 83, 85, 86, 88, 89. 90, 91, 95, 96)

I moved to withdraw my original motion to amend the complaint, dated January 24, 2022 to allow me to amend the complaint once as a matter of right before any complaint is served upon any Defendant. The District Court indicated it would not consider the motions since the appeal is stayed. DI 43, DI 81. Nevertheless, if the case should go back to this Court on remand, I may refer to the docket items and information contained therein arising in real time with prior notice to the court and opposing counsel of the additional evidence, parties, and facts I intend to include in an amended complaint as a matter of right, per this District Court's staff's brilliant suggestion. DI 69-75, 77, 85, 96... I filed additional Motions to conform complaint to the additional facts and legal arguments as they arise as if included in the original complaint once as a matter of right. DI 77-85

12. DE made a finding of disability causing reciprocal suits. Kelly asserted a physical limitation under the ADA before the DE Supreme Court in the DE Disciplinary case and reserved the potential claim on the record below

After Kelly v Trump concluded and after I filed Kelly v Swartz, the ODC started a proceeding against me where No 7 in the petition alleged my religious beliefs and citations to the Bible where my religious beliefs were in issue in Kelly v Trump as the source of the discipline/disability proceeding, where they denied me the ability to defend myself and

demeaned my poverty as not having a working computer which were noticed of in the Motion for reargument as an additional source. (See Exhibit A, B, C, D).

The Board refused to allow me to self-represent until about 2 weeks before the hearing date, while the Board ignored my motions objecting to notice, appointed counsel, religious objections to examinations by healthcare and mental healthcare professionals, assertions of the right to subpoena witnesses, despite having fewer days to call them and other motions.

I developed the shingles. I also asserted my right to live and made it known that I require time in order not to die or harm my health due to the bad surgery I had as a youth. See DI 43.

I want to make it clear. I believe people go to hell for requiring others to trust in science, professionals, mental health and healthcare professionals or their technology, product or service they sell as guides and I see as minigods. *Romans* 1:25 I also believe people go to hell for using people as products in data, science, to sell products. In *Kelly v Trump* I indicated I have religious objections for my data to be collected in science. DI 4.

I have religious objections to the worship or deference of science, experts or their products as demi-gods above God. The Bible teaches God will destroy in hell anyone who exploits, harms or destroys my body or other people's lives or eternal lives for material gain even knowledge, if they do not repent. Citing, 1 Corinthians 3-17. The fact professionals did what they were trained to do is guilt to God when they are blinded by a paycheck and convenience to care for their own, they did not care to consider the harm their paid or volunteered work caused others. I believe judges may save healthcare workers from certain damnation in hell when they too used their own minds to discern whether standardized practices harmed people so they may prevent people from murdering or oppressing or otherwise harming others for money in business.

The Board and the Supreme Court were advised of my asserted healthcare requirements. I attached to Kelly v Trump and to my answers to the Board's petition Exhibit 43, attached hereto at Exhibit D. I emailed them. I showed them a picture of the rash I believed was the shingles.

Yet I moved to suspend the hearing date to allow me fair opportunity to prepare in light of the unfair denial of my ignored motion to suspend the hearing date to allow me a reasonable and fair opportunity to perform discovery and call witnesses to defend my liberty, life and licenses 2 days before the hearing by an email, not a formal order, not based on the shingles and weakness.

I was compelled to attend the proceeding where the Court reporter inaccurately and prejudicial made up things I did not say. My proceeding was compromised and I maintained my objections after noting with horror some of the outlandish words she distorted.

I did not have a working computer at the time. Defendants compelled me not to work as an attorney. I did have money to buy another computer. It is against my religious beliefs to go into debt. I believe people go to hell for requiring people be enslaved to debt to money as master, savior, guide and God. Debt is against my religious beliefs. The bible specifically states that people go to hell for charging interest on debt. I am not violating my religious beliefs to please my attackers as they seek to destroy me because they find my religious beliefs in Jesus not money as God repugnant. Matthew 6:24 The help my parents give is different in that they obey God by forgiving debt which cannot be paid.

I did not have a phone in early Jan 2022. My mother mailed me a phone in the nick of time. I only attended the hearing wherein I made a special appearance and objected to lack of

sufficient notice, lack of a fair opportunity to be heard to call witnesses and other objections to prevent a crooked finding of contempt to appear. The panel included a participant also participating by phone.

The Board found me disabled. I appealed the decision and incorporate my Objections and my June 7, 2022 by reference in their entirety. DI 77-79.

I filed various motions before the DE Supreme Court including a Motion to exempt the swearing in and affirming requirements as against my religious beliefs. I also reserved an ADA claim for lack of requirements given my weakness and threat of death and fainting if I am not afforded time to care for my health by resting, drinking gallons of water and exercise not only in this civil rights case but in the DE Disciplinary proceeding at T-3, paragraph 36, attached hereto with every exhibit and DI and 3DI incorporated herein by reference in full with exhibits, even if not attached hereto.

In the 6th Affidavit in the District Court at DI 105, I also indicated I sought time under the ADA, not related to mental disability, but a permanent physical need I have had to assert for more than 20 years in order not to die for the vanity and convenience of others and averred:

“25. I asked opposing counsel his stance on additional motions. The government through its arms should not compel me to violate my religious beliefs against debt in order to exercise my right to be heard, or cause me to forgo my 1st and 14th Amendment rights. I should be afforded time to draft necessary motions.

26. I am threatened with harm to health and even possible death due to severe dehydration should this court not accommodate me by granting me time I require to sustain my life and health in addition to defending my liberties before the Courts. I have religious objections to healthcare and mental healthcare.

27. I believe people sin when they thoughtlessly refer people to doctors, mental health specialists or professionals to pay to fix their problems misleading others to exploitation to serve greed. Many professionals are rendered above the law. Their standards are the letter of the law Courts wrongly adhere to in determining whether

workers performed the requisite duty of care. This creates poor products, bad services and evil businesses that are left uncorrected when they harm people for profit.

28. I believe that courts can save lives and eternal lives by correcting people paid to perform business who ignorantly or indifferently kill, steals, oppresses or destroys human life and health for the bottom line. Matthew 23:23, Amos 5:15.

29. I have strong religious objections to healthcare and mental healthcare. I believe people sin by blindly doing what they are trained to do, told to do, paid to do without choosing to see clearly to care about the potential harm they cause towards those they profess to serve. I believe people sin for teaching others to trust professionals in place of God. I believe business greed, conditionally caring is the mark of lawless lusts stemmed in no salvation from hell in people, without repentance.

30. In an exhibit, I incorporate herein as Exhibit 6, I previously provided to this Court, the US Supreme Court, the Delaware Board, Delaware Chancery, and Delaware Supreme Court I stated:

‘Due to the surgery referred herein, I am (self) required to drink water, rest, exercise and eat. So, I do not faint or die due to dehydration when I have my period. I lose five pounds of water weight each month. This is still a challenge. I must assert my right to live because people serve Satan by hardness of heart. Many do not want to be inconvenienced to care, to adapt to safeguard the lives and health of others, including my own. I am a child of God. My body is not my own. I am commanded to be holy because God is holy, to care for and treasure my body, and the lives and health of others too. ‘I am not my own’ Other people are loved by God too.’ [Exhibit 43, Exhibit D]

31. I had surgery more than 20 years ago, and I have to assert my right to live. I am very dehydrated, dangerously so now, and it has lasted beyond a week. I must be afforded time, an accommodation to sustain my life and health.

32. I used to drink a big gallon of water at the gym. Since the Delaware Supreme Court prevents me from returning to my former firm, I cannot afford to go to the gym. I have not been able to drink water or take time to care for my body as I should because of the time required to attend to this case and related proceedings.

33. Dehydration is serious. In undergrad at UD, I fainted during a class due to dehydration. When I awoke, no one was there but me. I was so embarrassed to discover I peed my pants, but at least I was not dead. Having enough water, and time to care for myself is required. It is not a disability to be human with individual unique limits. Nevertheless, I assert the ADA act’s requirements for access to the courts and accommodations, if applicable, nevertheless. (42 U.S.C. §§ 12181- 12189) I should be afforded an accommodation to sustain my life and health as well as my licenses and liberty interests. The accommodation of a stay or more time does not prejudice opposing

counsel or the Courts. Instead, it will likely prevent duplicity in work, requiring time I need to defend my liberty and sustain my life.³⁹

34. My First motion for additional time in the amount of 45 days to response to the PA-ODC's motion was denied.

35. This Court granted a second motion in the amount of 14 days, which is not sufficient under the circumstances. I am prejudiced.

36. After everything was rejected, I alerted the Clerk I would draft a new motion given the new facts and circumstances necessitating a stay and at least a continuation.

37. The Clerk understands my computer broke, and I noted I would draft a motion without delay for a continuation.

38. The Clerk cited the November 8, 2022 order that no further extensions would be considered, as to discourage my filing. And yet in other cases Courts state the same or similar language and still grant time to prevent manifest injustice and avoid procedural due process violations. See for example, *Mir v. Bureau of Pro. & Occupational Affs.*, No. 2557 C.D. 2015, 2016 WL 6407477, at *3 (Pa. Commw. Ct. Oct. 31, 2016)."

In August 2022, the DE Supreme Court rendered an order against me which initiated immediate reciprocal law suits against me. I asserted my 5th Amendment right against self-incrimination in the US Supreme Court and DC. After I discovered the Defendant

I asserted a number of Constitutional arguments on the record albeit some are from reciprocal cases against Board proceedings and certain rules. I reserved my right to add more.

³⁹ "Congress has abrogated states' sovereign immunity for cases that arise under Title II of the ADA if they implicate the "fundamental right of access to the courts." *Tennessee v. Lane*, 541 U.S. 509, 533-534 (2004)." *Reed v. Illinois*, No. 19-1164, at *4 (7th Cir. Jan. 9, 2020); *McDonough, Petitioner*, 457 Mass. 512, 519 n.16 (Mass. 2010) ("The United States Supreme Court has concluded that Title II of the ADA applies "to the class of cases implicating the fundamental right of access to the courts," and as such "constitutes a valid exercise of Congress' § 5 authority to enforce the guarantees of the Fourteenth Amendment" on the States. *Tennessee v. Lane*, 541 U.S. 509, 533-534 (2004) (ADA validly applies to States to extent that State court facilities are so constructed as to bar physical access to courts by individuals with disabilities)."); 42 U.S.C. § 12182 "(i) **Denial of participation**, It shall be discriminatory to subject an individual or class of individuals on the basis of a disability or disabilities of such individual or class, directly, or through contractual, **licensing**, or other arrangements, to a denial of the opportunity of the individual or class to participate in or benefit from the goods, services, facilities, privileges, advantages, or accommodations of an entity."

42 U.S.C. § 12182 (a) "No individual shall be discriminated against on the basis of disability in the full and equal enjoyment of the goods, services, facilities, privileges, advantages, or accommodations of any place of public accommodation by any person who owns, leases (or leases to), or operates a place of public accommodation."

The Disciplinary proceedings cause injustice by eliminating Constitutional freedoms for business, making professionals whose standards harm, enslave, kill, steal or destroy human life, liberty or health above court correction by granting professionals the power to be their own judge of their own partial professions or personal interest in serving business not people or freedom.

The Board found me disabled. I appealed the decision and incorporate my Objections and Respondent's reply to ODC's Corrected Response to Respondent's Objections to the Report and Recommendation of the Board on Professional Responsibility, dated June 7, 2022, along with exhibits by reference in their entirety. DI 77-79.

In August 2022, the DE Supreme Court rendered an order against me which initiated immediate reciprocal law suits against me. I asserted my 5th Amendment right against self-incrimination in the US Supreme Court and DC.

I am exhausted. I had a bad surgery in my youth and must demand time to drink gallons of water to rest, exercise and care for y health in order not to harm my health or die. I have religious objections to healthcare examinations. I require time to rest, exercise, and drink gallons of water to sustain my life and not die for the vanity of men.

I have severe dehydration each month which is life threatening if I am not afforded opportunity to alleviate it. I actually do not feel well as I write this. My mouth peels because of severe dehydration. I become extremely weak, which is expected from severe dangerous dehydration.

While I attempted to mailout a pleading to PA ODC in a reciprocal case, I collapsed to the floor and could not stand at the post office due to severe dehydration. A customer got my water to revive myself. In the DE Disciplinary proceeding I reserved an ADA claim and I

reserved the discretion to add it in this case should it be remanded below. However, I am more concerned about my ability to exercise my private 1st Amendment rights including religious belief with government incited persecution, and my ability to buy and sell as an attorney being removed but for my religious beliefs in Jesus.

13. Judge Phipps' created an obstacle so great as to vitiate my access to the US Supreme Court to appeal the original disciplinary decision by denying my asserted right to fair access to other courts by denying my Motion to stay the proceeding pending the US Supreme Court's determination of the original disciplinary proceeding, and by instead expediting the hearing date before briefing was due.

The State of Delaware's Disciplinary proceeding caused other reciprocal suits to arise. Given my poverty, limited access to resources, my asserted 1st Amendment right to live given my health requirements including time to sustain my life due to the bad healthcare I received as a youth, I sought to stay the civil rights case in order not to vitiate my access to the US Supreme Court to exercise my right to petition the original disciplinary finding, which was denied by Judge Phipps vitiating my First Amendment right to petition, 5th Amendment right to fair access to other courts and the Constitutional rights and my license I sought to defend on appeal. Judge Phipps expedited the hearing date and set the date before I filed my brief making it an impossibility for the US Supreme Court to grant my requests for a petition before judgment and an application for an interim stay pending a full court's determination of the petition before judgment regarding Judge Phipp's denial of a stay relief.

Per exhibit P incorporated herein containing a letter from my case manager of the US Supreme Court, my initial petition for writ of certiorari to appeal the DE Order placing my license to practice law on disabled inactive was rejected on 2/7/23, since I filed a Motion for leave for additional pages prior to filing the petition instead of simultaneously therewith. The new due date and potential proceedings before the US Supreme Court concerning matter No.

22A476 incorporated herein by reference overlapped with the civil rights proceeding. I had insufficient resources to fairly fight the original case, this civil rights case, and the reciprocal cases. I required a stay, given my lack of adequate time and resources to even sufficient paper, ink, transportations costs, access to research. Judge Phipp's Order vitiated my access to the US Supreme Court Courts by denial of a stay pending a determination of the US Supreme Court's determination on appeal of the original Delaware Disability Order. I also was deprived of an adequate opportunity to petition for a rehearing of this Court's denial of my petition in Kelly v Third Circuit Court of Appeals, a Reciprocal case, No. 22-6584, and No. 22A478

Phipps denial of a stay pending an appeal of the original disciplinary case and a reciprocal case and the US Supreme Court's delay in docketing rendered my right to petition the original disciplinary case vitiated under the facts of this case.

An interim stay was required to prevent foreclosing my 1st Amendment right to petition and 5th and 14th Amendment opportunity to be heard in this and other forums to prevent irreparable injury in terms of loss of fundamental rights, licenses and harm to life.

I have not been able to work as an attorney due to the Defendants placement of my license on disability, and I have insufficient resources to fairly fight all law suits simultaneously.

On January 1, 2023, I filed Appellant Meghan Kelly's Motion for additional time to file a brief in reply to Defendant's Answer in the amount of 45 days. 3DI-126-127, incorporated herein by reference.

I realized I could not fight all cases simultaneously fairly. So, on January 4, 223 I moved Judge Phipps for to stay the proceeding below until the conclusion of the originating disciplinary proceeding, until final non-appealable determinations are made or the time of appeal has lapsed.

I further move the Court, for good cause for permission to file the “for cause” motion 30 days after the stay is lifted. 3DI-129. On January 4, 2023, I filed corrections at 3DI-130.

On January 6, 2023, Phipp’s denied the motion for a stay, and granted 45 day extension.

On or about February 6, 2023, I filed a Petition for Writ of Certiorari before judgment to this United States Supreme Court pursuant to 28 U.S.C. § 2101 (e) to the United States Court of Appeals for the Third Circuit, Case Numbers 22-8037 and 22-2079 to vacate a denial of a stay pending this Honorable Court’s determination or denial of writ of certiorari of both the Third Circuit Reciprocal Disciplinary Case US Supreme Court Number 22-6584 and the Delaware Disciplinary case. US Supreme Court No. 22-6783.

On February 7, 2023, I filed Appellant Plaintiff Meghan M Kelly’s Motion for an interim stay of the Proceeding until the conclusion of the appeal of this Court’s Order at Third Circuit Docket Item Number (hereinafter “3DI”) 3DI 131 denying a stay. (3D-138)

On February 9, 2023, Judge Phipps of the Third Circuit denied my motion for an interim stay. (3DI-141). . Pursuant to Supreme Court 23 (3) “the relief sought [an interim stay] is not available from any other court or judge,” since Justice Phipps denied it.

On or about February 9, 2023, I submitted an interim application for a stay to prevent irreparable injury to my life, liberty, licenses and eternal life that this Justice Alito denied, I incorporate herein by reference. Justice Alito denied my application for an interim stay on or about February 22, 2023, No. 22A747.

On or about February 15, 2023, I alerted my case manager and opposing counsel that the United States Supreme Court docketed my appeals of this Court’s Orders denying my motion for a stay to slow down the matter to prevent irreparable injury to me in the form of loss of

fundamental rights, loss of the opportunity to be heard and to petition, harm to health, life and other injuries. I incorporate herein by reference Third Circuit Docket Items (hereinafter “3DI” 3DI-131, 3DI-141, also see and incorporated herein 3DI-119, 3DI-126, 3DI-129, 3DI-130, 3DI-138, regarding harm and 3DI-133 regarding to appeal to the US Supreme Court where the Third Circuit is a party, No. 22-6584).

On February 16, 2023, I filed Appellant Meghan Kelly’s Motion for this Court to waive costs for preparation and transmittal of the record to the US Supreme Court, should the Court require the record and other costs, fees, expenses, taxes or charges at 3DI- 146 incorporated herein by reference. I argued therein at paragraph 38:

“I respectfully request this Court render on Order on my motion to exempt any charges, fees, taxes, and costs (1). in order not to compel me to violate my religious beliefs in exchange for access to the courts or (2). suffer an economic substantial burden so great as to deny me access to the courts in defense of my First Amendment liberties, license and related interests and (3). to prevent government compelled involuntary servitude to sin by making money savior in place of God, prior to scheduling a new hearing date. 3DI-137.”

Later that day, February 16, 2023 the Court expedited scheduling, indicating this case is “tentatively listed on the merits on Tuesday, April 11, 2023 in Philadelphia, PA.” (3DI-147)

On February 16, 2023, the Third Circuit expedited the case before briefing was complete, by scheduling it on April 11, 2023, with knowledge this prejudices me in term of loss of time and resources I require in order not to forgo my right to petition in other cases by government compelled, not free choice. This expedition also prejudices me in terms of loss of the 5th amendment right to be heard, and the First Amendment right to petition before this Honorable Court by rendering my petition moot before it is heard if this Court doesn’t have time to grant emergency relief.

Despite my two appeals requesting a stay to this Court to prevent irreparable injury harm to health and life, reputation, licenses and loss of fundamental rights as well as other injury, in bad faith the Third Circuit filed a notice of a hearing unusually before briefing was complete, and before rendering orders on outstanding motions with the intent to eliminate my right to petition and opportunity to be heard at the US Supreme Court in utter disregard for the irreparable injury to me.

The Third Circuit in bad faith scheduled the conference prior to the completion of briefing. The due date for my reply brief was not yet due.

The court knew I was seeking to slow down the case to prevent irreparable injury to me. As a response the Court retaliated by expediting the case, in hopes to evade review by the United States Supreme Court by rendering the issue of a stay moot. (3DI 131, 3DI 141)

Later the same day, February 16, 2023, the Court entered a docket entry a 3DI-138 “NOTICE from U.S. Supreme Court. Petition for Writ of Certiorari filed by Meghan M. Kelly on 02/06/2023 and placed on the docket 02/15/2023. Supreme Court Case No. 22-6783.”

I immediately filed a motion with the Third Circuit on the same day, February 16, 2023 to move the Court to postpone scheduling the hearing so I may be afforded access to other courts including but not limited to this United States Supreme Court should this Court accept my appeal on 22-6584 to prevent irreparable injury in terms of loss of fundamental rights and other irreparable harm. (3DI-149)

On March 3, 2023, I talked with my case manager and indicated it had been about 4 days or so since the time for opposing counsel had lapsed to address my motion objecting to the hearing date and other outstanding motions relating to recusals since Judge Phipps was in charge

to the best of my knowledge. I did not understand why my motion to postpone the hearing so as not to deprive me of an opportunity to petition and be heard and other harm was not referred to a panel. She did not have an answer other stating it was pending or being reviewed. She noted on other motions “referred to a panel,” after the time for opposing counsel to respond had lapsed. No such notation was on the docket for the outstanding motions on the docket despite it being past time for opposing counsel to respond, unlike other motions.

It appears the hearing at 3DI-147 was scheduled in bad faith to cause me to forgo my access to other courts, to harm my health and to pressure me into forgoing my right to petition the courts in violation of the 5th Amendment’s Equal Protections component as applied to me based on my genuine religious beliefs for which Defendants appeared to discipline me for too.

On February 16, 2023, my case manager indicated the scheduler was charged with scheduling, not her.

I called the scheduler on February 16, 2023. He directed me to talk with my case manager to discern who requests the scheduler to schedule. He mentioned in passing case managers at time contact him to schedule, but could not answer my question as to who directed him to schedule the hearing in bad faith, knowing I face irreparable injury for the expedition of this matter.

I have multiple law suits against my person due to the Defendants’ bad faith disciplinary case against me. I faced irreparable injury, the foreclosure to access to other courts by wrongful expedition of the Third Circuit case, loss of fundamental rights, and harm to health. My case manager knew I was seeking to eliminate the threat of compelled debt, and compelled violations

of religious belief against debt before it is too late and a compelled violation occurs denying me of the opportunity to petition against it. US Amend 1, V.

The scheduler indicated Third Circuit Linda Blank usually sends out a letter to pro se and attorneys on cases to pick a good week for hearing. I did not get a letter. The scheduler could not pull a letter for me, but Linda Blank may have sent opposing counsel a letter January 25, 2023.

On February 16, 2023, I requested to speak with Linda Blank. My request was denied.

I sought to prevent irreparable injury in terms of loss of access to other courts as to vitiate my 1st Amendment the original disciplinary proceeding 3DI Phipp's denied my motion for a stay but granted 45 days.

I appealed the denial of a stay to the US Supreme Court and incorporate my filings in here by reference in Numbers No. 22-6783. I requested an interim stay by Justice Alito until a determination of the petition before judgment was made by the entire the court at No. 22A747.

Justice Alito denied my application. I swiftly filed a letter for Justice Jackson's dated March 10, 2023 consideration. The letter was not accepted by the court after 7 days. So, I filed a second letter dated March 21, 2023. (App Y). Neither of the letters were placed on the docket until the about March 27 or 28th, more than two weeks since the date I sent it.

The US Supreme Court's delay in docketing the letters, and scheduling of a conference of at a time relief would be moot as to render my access to the courts essentially vitiated. So, I moved to dismiss the petition and application, and my Right to petition was vitiated by an obstacle so great as to den me access to the courts in defense of my 1st Amendment belief in Jesus and other rights.

14. During my proceeding the Appellate Court below, reciprocating courts, and the Defendant Delaware Supreme Court and staff punished me to chill my First Amendment right to petition to correct the Court staff's docketing mistakes.

I had licenses to practice law in PA, DE, DC, Third Circuit, DE District Court, DC, and the US Supreme Court.

The DE Order placing my license to practice law on inactive disabled initiated requirements to assert my 5th Amendment right against self-incrimination or report to every jurisdiction where I have license interests.

On or about Monday, August 22, 2022, I contacted the Third Circuit to speak with the case manager Desiree regarding 5 separate mailings coming in for a reciprocal disciplinary matter, not this Civil rights law suit.. DI 77-88.

I learned Desiree, the case manager was on vacation until August 30 or 31,st 2022.

I called the Third Circuit and spoke with a representative to alert them that mailings were coming in for the disciplinary matter, not the civil rights suit brought because of the wrongful disciplinary proceeding against me.

Representatives confirmed they would be on the lookout for mailings and would not place them on my civil rights case.

I emailed Pam, my case manager to alert her that I had mailings coming to the Third Circuit. I asked her not to file these mailings for the disciplinary matter in the Civil Rights proceeding.

Pam confirmed Desiree's team were looking out for my mailings.

Despite my attempts to prevent documents relating to a confidential proceeding from being uploaded on the wrong case publicly, on August 24, 2022, a documents for the disciplinary file was uploaded onto this matter by mistake at DI 77.

There was a total of five separate mailings I have already sent out which should be in the Third Circuit's possession, with even more DI items to be uploaded in the separate disciplinary matter. (App DD)

I requested the Court strike the mistake by letter, than drafted motions for the court to remove them. (App DD)

I telephoned and emailed the staff to inform them I was mailing the Third circuit filings for a reciprocating law suit against me. I stressed the importance of not docketing it on this case per the various motions, but it was placed on this case. I did not understand how this could have happened.

I note with prejudice that the misfiled prejudicial order was easy to read. Whereas my attachments were lighter and harder to read. The misfiling was quite prejudicial. It placed me in an unfavorable light. (App DD)

On August 17, 2022, the Clerk filed an Order

“1) Appellant's Letter Regarding the Order of the Supreme Court of Delaware Transferring Her to Disability Inactive Status

2) Appellant's Letter Regarding Last Paragraph of Earlier Letter _ The appellant electronically filed the foregoing 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.”

Thereafter I filed formal motions to remove the misfiled documents, and an amended motion. (App DD)

I requested a panel not the clerk to correct the docket after multiple attempts by letter, motion under rule 10 and amended motion under rule 10 as I worked swiftly as I faced potentially 6 law suits against me at the time with heartless lawyers with hawk eyes staring at the

civil rights case and the documents filed in a prejudicial manner in hopes to devour me like buzzards. (App DD)

The Clerk made false allegations in bad faith stating a falsehood that I emailed documents for the Third Circuit disciplinary case using the special emergency email instead of mailing it. The Court in bad faith threatened sanctions against me for petitioning to remove prejudicially filed documents from the docket meant for the reciprocating case in light of the emergency email.

I did not use the emergency email

The mailing envelop and proof of postage was on the docket along with the misfiled documents. I attach the proof it was mailed on the docket and incorporate it herein in App DD. Yet the Clerk indicated a threat of punishment in retaliation for my request to fix the court's error and for allegedly filing the documents under the special emergency email, which I did not use in filing the disciplinary documents.

Another reciprocating Court the PA Supreme Court refused to docket my 1st Amendment petitions to safeguard my religious belief in Jesus not money as God. I made motions no other person has made to defend my religious belief and exercise of belief in Jesus as God, not money as God. I believe I believe people go to hell for creating debt penalties and using money as guide and God, reflecting the image of the lawless one by making mammon God.

The Court staff in the Eastern District Court, the District like the DE Supreme Court and the Third Circuit punished me in retaliation for petitioning the Court its own correct perceived mistakes or misconduct, which impeded my exercise of the right to petition to defend my claims and constitutional rights effectively. App DD, internal exhibits P, Q, R, S, T, U. When my case

manager was out, another staff misfiled thousands of pages misfiled, placed items out of order, with missing items and placed another pro se litigants filings and health information on my docket in 22-45 for the Eastern District of PA, attached hereto in App DD.

I moved the Third Circuit Court to correct the misfiled documents in the Eastern District Court of PA by filing the thousands of pages showing about 20 years of state persecution against me for my exercise of fundamental rights, even before I was barred in Delaware. I seek to protect the court, even when I file petitions to correct the court. After the DE made an order, I attempted to adhere to the law by asserting my 5th Amendment right or by providing notice to each of the courts I am licensed to practice law concerning the DE order.

15. Defendants the Board and Disciplinary Counsel violated Rule 9 and Rule h of the disciplinary rules in additional ways by failing to provide documents 10 days in advance of any hearing date to me and preventing me from calling witnesses by allowing me to self-represent with fewer than the 10 days required to not only subpoena witnesses but to provide expected testimony of witnesses to opposing counsel preventing me asserted right to call and cross examine witnesses

I was not mailed notice on the date the Board alleged notice was sent December 10, 2022. I objected to lack of notice and lack of sufficient notice.

I not only did not receive notice on December 10, 2023, I did not receive notice 20 days before any alleged hearing date and was prejudiced. Del. Law. R. of Disciplinary Proc. Rule 9 (d)(3) provides, “The Administrative Assistant shall serve a notice of hearing upon the ODC and the respondent, identifying the members of the Board assigned to the matter, and the date and place of the hearing. The notice shall be given at least **20 days in advance of the date of the hearing.**” The rule was made to protect me the accused.

Unbeknownst to me the Delaware Supreme Court appointed counsel on December 13, 2022 despite my prior objections based on my 1st Amendment right to religious belief and my 6th

Amendment right to self-represent. Jesus teaches me to allow the holy spirit to be my advocate when I am wrongly brought to court based on my religious beliefs in Jesus. Albeit I may be amicable to allow an attorney to represent me in this case.

The attorney reached out to me. I did not accept representation. On Friday December 16, 2022 I fired him by copying people after he would not accept my firing to protect my religious belief in Jesus Christ's teachings. He argued I did not have capacity to fire him which is insulting. Then I immediately filed a motion in letter form. (DI 3 District Court exhibits). The letter format is the same letter form opposing counsel used to petition the Delaware Supreme Court to appoint counsel despite my prior objecting to counsel. I objected to insufficient notice and moved the Board and the Court to grant me time to perform discovery, and I petitioned the board and the court to suspend the hearing date to a date after the counsel issue and discovery issue were resolved.

The Board and the Court never addressed this Motion, despite my follow ups until two days before the hearing date which was postponed for a reason I did not request the shingles for 8 days fewer days than required by the Board.

I was not afforded the right to self-represent until December 30, 2023 per the Order attached herein, less than 2 weeks before the initial date, January 13, 2023. App Z, Exhibit B

I filed a variety of other motions the Board ignored in motion format. In addition I filed motions in motion format after the Board denied my December 18th petition two days before the hearing. I sought to suspend the hearing until the court and parties sort out representation, and time for discovery. I also objected to notice. I filed additional motions objecting to notice,

moving to stay the proceeding until I had been afforded an adequate opportunity to prepare and perform discovery, objecting to examinations as against religious beliefs.

Upon receiving an Order to move the hearing 8 days fewer than the more than 10 days required to call witnesses and trade documents under Rule H, for a reason not requested shingles, I appealed to the DE Supreme Court a second time to prevent the vitiation of my rights, after the Court denied my appeal of the email order.

The Court indicated it would not hear my appeal until the harm occurred.

Disciplinary Counsel violated additional disciplinary rules to protect me in addition to the Constitutional claims I made I incorporate hereto in my Reply attached hereto. She never provided documents she presented to the Board to me prior to or during the hearing in accordance to the rules 10 day requirement. Id. The Board deprived me of the opportunity to call witnesses by denying me time to call them within the scope of the rules where no ordinary reasonable attorney would have time under the circumstances too.

Del. Law. R. of Disciplinary Proc. Rule 12 (h) provides:

“Exchange of information. The ODC and the respondent shall exchange names of witnesses and copies of documents to be used by each side in its case in chief 10 business days prior to any hearing, and may supplement those lists thereafter with the approval of the opposing party or the chair of the Hearing Panel. Recorded statements, if any, of all witnesses so designated shall be exchanged at the same time. The exchange may take place by first-class mail to the respondent’s last known address. The Hearing Panel may exclude any evidence offered by a party who fails to comply with this Rule.”

I filed a formal motion for time to subpoena Arline Simmons and Judge Clark and others, with fewer than two days to the proceeding since I did not know whether the Board would grant my motion to suspend the hearing until two days before.

Opposing counsel never provided documents in accordance to Del. Law. R. of Disciplinary Proc. Rule 12 (h). I requested for the documents submitted to the Board members in advance to be given to me after the hearing on January 31, 2023 per the attached emails contained in App X Cont. Exhibits, C, D, E.

I was not afforded the time to even subpoena people more than 10 days before the hearing date or to gather information. I was denied a fair opportunity to present my case, call witnesses, cross examine them, and a bunch of other rights I previously stated herein or in the attached documents hereto including but not limited to my motions for rehearings and the reply. (Also see, (DI 36) Cont. E Rehearing rescheduled for a reason I did not request with fewer days than the rules permit to call witnesses, attached hereto)

16. Kelly was denied access to the law library. Defendant Patricia Swartz in bad faith lied to cause needless expenses in an attempt to prevent my petition. Delaware Supreme Court refused to place my appeal on the record in full without fighting by taking additional steps to place them on the docket

Other issues arise, per DI 53 and DI 55 not attached hereto. I was denied access to the law library and the Clerk of Court refused to make my physical exhibits to my Answer part of the record in the original disciplinary case. I was required to expend money and travel to Del Tech who turned me away at first due to religious political beliefs before I received permission to scan as a former UD student. I had to make more trips to gain permission. It was painful as I outlined on the record in the District Court prior to the April 26, 2022 order I appealed.

After I scanned in all of the items, then the Supreme Court allegedly placed them on the docket.

After I filed my answer, I received confirmation of receipt that Defendant Patricia Swartz received it. Nevertheless, I sent an email to confirm receipt. Defendant Patricia Swartz waited

until the next week on the due date to lie by indicating she had not received it, despite the fact I had confirmation of receipt. So, I printed everything out and mailed it to her a second time in an expedited expensive fashion.

When I came home after driving to the post office Patricia Swartz in bad faith lied indicating the box came by US Post Office that day. I did not even mail the second box until the hour I checked the email. So she could not have received it then.

The State is not above the law and I am not below the law's protections. I did not sell my soul to hell by making the evil desires of man for convenience, avoidance of costs and productivity at the cost of human sacrifice and liberty to be guide, master or god, which is the mark of the beast the mark of lawlessness based on lusts leading to certain damnation in the fires of hell God, should people not be made clean. I was quite upset. DI 29.

17. Denial of access to the records where I am a party to discern if I was denied the right to be heard by failure to docket my motions

I filed a variety of motions prior to the December 30, 2022 Order giving my right to self-represent. I have a right to know whether they were received by the Delaware Supreme Court, including but not limited to the attached exhibits in DI 35.

(DI 35) Cont. EXHIBIT F Letter to court, dated November 22, 2021, regarding my intent to object to appointment of counsel on religious grounds.

(DI 35) Cont. EXHIBIT G Letter Motion to the Board, dated December 18, 2021, regarding intent to object to appointed counsel, request to postpone hearing, request time for discovery and a determination on counsel

(DI 35) Cont. EXHIBIT H Respondent Meghan Kelly'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

(Internal Exhibits) Exhibit 1, the Delaware Supreme Court Order relating to Counsel, dated December 13, 2021

Exhibit 2, Letter from Appointed Counsel

Exhibit 4 Email to appointed counsel after I declined forced representation concerning another idea for the court to entertain.

(DI 35) Cont. EXHIBIT I Letter to the state court, dated December 21, 2021, concerning I declined representation from counsel, per attached letter to appointed counsel, and requested the court honor my motion. For reconsideration of the order dated December 13, 2021 appointing counsel, despite my objection.

(DI 35) Cont. EXHIBIT J Letter to the Board of Professional Conduct of the state of Delaware and the Delaware Supreme Court, dated December 29, 2021, two weeks from the hearing, concerning the court's and board's determination of postponement of the hearing in the interest of justice, and status of a determination of my 6th Amendment right to self-representation. [I never heard back until 2 days prior to the hearing date in a nonappealable email form despite calls and filed letter requesting status]

(DI 35) Cont. Internal Exhibits (Exhibit A) First Page of the Office of Disciplinary's April 23, 2021 letter indicating the Supreme Court's pleadings as a source of their concern.

(Exhibit A part 2) Page 2-3 of Defendants petition showing the reason why they bring the state law suit against me is for my religious beliefs, citing the bible as authority for my beliefs, and their inability to understand my beliefs in Jesus.

(Exhibit B) E-mail to Attorney Generals, dated December 16, 2021, showing my distress at appointment of counsel, in the form of tears, admissible present sense impression, putting planning to prevent an economic crash on the back burner.

(Exhibit C) November 23, 2021 letter to DE Supreme Court indicating I intend to object on subject matter grounds and why.

(Exhibit C part 2) Email to Attorney General, dated December 15, 2021, concerning PACER, and showing emotional distress, and the need to protect free exercise of religion from the forced worship of money by the state, and discussions of the planned, preventable, reversible economic crash.

(Exhibit D) Certificate of Service of Respondent's Motion for Reconsideration of Order Dated December 13, 2021, appointing counsel despite notice of my intent to object, and objection of improper service of the board's notice of a hearing, dated December 21, 2021, (This shows I gave the board a copy a day after I served opposing counsel and the Court)

(Exhibit E) Email to Defendant, dated November 4, 2021, objecting to improper service of the August 23, 2021 letter and requiring paper mailed copies, also objecting to the appointment of counsel on religious grounds, and grounds of harassment and intentional infliction of emotional distress, providing notice to the Defendant appointment of counsel uniquely upsets me, and copying loved ones for my safety.

(Exhibit F) Email, dated December 22, 2021, to Defendant opposing appointed counsel

(Exhibit G) E-mail dated December 21, 2021, to the Court, Board and Defendant, indicating I did not accept representation from appointed counsel, and requested a docket, and an attachment of the

December 21, 2021 letter objecting to counsel, attached letter to Counsel declining representation, dated December 20, 2021

(Exhibit H) Email dated, December 22, 2021, E-mail to court about representation forwarding my email to counsel showing I fired him.

(Exhibit I) E-mail dated, December 27, 2021, to the court regarding concern not all documents were filed with the court, and attached docket where appointed counsel moved to withdraw per my request. My documents apparently were not docketed depriving me of the fair opportunity to be heard.

(Exhibit J) E-mail dated, December 28, 2021 to the Court, indicating appointed counsel did not have the documents I filed, and the Court did not send him all of the documents I sent, which may be needed in case of an appeal.

(Exhibit K) E-mail dated, December 23, 2021, to the Court regarding my religious oppositions to expert examinations, and conformation of receipt of filings, with attached filings for the Monday December 20, 2021 Motion filed with the court and board.

(DI 35) Cont. EXHIBIT K Email, dated Jan. 6, 2022, one week from the hearing, I sent to the Board of Professional Conduct of the state of Delaware and opposing counsel to check on the status of my motion to postpone the hearing scheduled Jan. 13, 2022

In App Z attached hereto and incorporated herein I requested the Delaware Supreme Court through the Clerk of Court Lisa Dolph grant me access to the docket and the pleadings that were filed in the Matter of Meghan Kelly, Case Number 541 against me, the party, concerning the appointment of counsel.

On January 10, 2023 in response to Lia Dolphe denying me access to the pleadings filed in the DE Supreme Court matter No 541 against me with regards to appointment of counsel, I replied back while copying US Attorney General David Weiss and asserted:

“ I am entitled to know the record that was used against me. It is concerning especially that my motions objecting to counsel and other documents are not on the record where my life, liberty and eternal life are at stake, to show my pleas, and to show I at no time delayed but asserted my rights.

It is prejudicial that they are not located on the correct docket 22-58, for the matter against my person and license.

I cannot trust the court since it ex parte concealed records in my favor, terminated two material witnesses to prevent their discovery, preventing my motions to perform discovery to prevent me from finding out.

Please reconsider your stance. I believe I am entitled to records used against me as a party in a proceeding. I am entitled to see if my pleadings were on the record or if I was denied an opportunity to be heard in contravention to 1st and 14th Due Process with disparate treatment based on religious-political belief and poverty. US Amend I, XIV. See, *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).

Even the poor, and those with religious beliefs who do not conform with the majority are afforded Constitutional protections that may not be eliminated without a necessary reason more compelling than fundamental rights and protections created to protect citizens including me from government overreach.

I am entitled to the record in any case where I am a party no matter the form the court maintains them or conceals them or seeks to eliminate them as they seek to eliminate my existence by sealing records previously in *Kelly v Trump*”

I never got the records I am entitled to in the case against me.

18. Meghan Kelly's religious beliefs

Nothing was normal in my proceeding. My religious beliefs are not normal. My believes are genuine and are the source of government persecution.

My religious beliefs do not conform to the standards of the norm. I believe in God not the church or mere man in place of God. I believe Jesus Christ is God.

I believe Court correction can save lives and eternal lives. I believe people go to hell on the last day for not using their brain to care to know in order to love.⁴⁰ I believe Courts can help

⁴⁰ Hosea 4:6 (“My people are destroyed for lack of knowledge: because thou hast rejected knowledge, I will also reject thee, that thou shalt be no priest to me: seeing thou hast forgotten the law of thy God, I will also forget thy children.”); Romans (“They exchanged the truth about God for a lie, and worshiped and served created things rather than the Creator—who is forever praised.”); 2 Thes. 9- 12 (“9The coming of the lawless one will be in accordance with how Satan works. He will use all sorts of displays of power through signs and wonders that serve the lie, 10and all the ways that wickedness deceives those who are perishing. They perish because they refused to love the truth

guide the misguided and help the blind see to guide them to repent by turning away from evil business greed at the cost of human sacrifice. I believe most people go to hell which makes me sad. That is why I became a lawyer in hopes to ask the courts to save lives and eternal lives. The 2030 economic model violates my religious beliefs against debt and slavery outlined in the motion to file in forma pauperis. I believe the digital economy tempts humanity through slavery debt to do the will of those who control the resources only to lose their eternal life at a far greater level than our current economic model.

I believe we are born damned to hell and must be born again. *Psalms* 51:5, (“Surely I was sinful at birth, sinful from the time my mother conceived me.”) I believe children are taught to be enslaved to sin by people who tell them to do what they want, chase their dreams, heart or happiness to be enslaved by those who entice their desires, not free in Christ. See, *Luke* 16:15, (“And He said to them, “You are those who justify yourselves before men, but God knows your hearts. For what is highly esteemed among men is an abomination in the sight of God.”); See, *Matthew* 16:24-26 (“Then Jesus told his disciples, “If anyone would come after me, let him deny himself and take up his cross and follow me. 25 For whoever would save his life[a] will lose it, but whoever loses his life for my sake will find it. 26 For what will it profit a man if he gains the whole world and forfeits his soul? Or what shall a man give in return for his soul?.”). By soul God means eternal life to the second death in hell. I believe we must be born again to be saved from hell by laying down our desires to do God’s desires. Citing John 3. It is more tragic when babies and kids die since they are born in need of salvation from God and have fewer opportunities to be saved as opposed to being controlled by sin to escape death in hell.

and so be saved. 11For this reason God sends them a powerful delusion so that they will believe the lie 12and so that all will be condemned who have not believed the truth but have delighted in wickedness.”)

I believe Jesus teaches us not to do what we or people want, but lay down the desires and vanities of men to overcome temptations of lusts to love by doing what is right.

Justice in the courts is what God wants. *Citing Amos 5:15, and Matthew 23:23.* Injustice occurs when the government and the courts are **partial towards appearance** towards its selfish positions, business and material gain by selling souls and the freedoms of those they are charge to serve not sacrifice and exploit. See, *John 7:24* ("Do not judge by appearances, but judge with right judgment."); See *Matthew 12:34-38* concerning discerning what is in the hearts of men.

I have religious beliefs against partiality by the courts. I place my faith in God the father, son and holy spirit including the holy spirit revealed to us by people within the Bible. The Bible teaches me partiality by judges even toward productivity of its own courts as opposed to the impartial application of the Constitutional rule of law creates injustice. (See footnote 8)

The Board proceedings violate the 5th Amendment requirement of impartiality by partiality towards business by seeking productivity, avoidance of costs, marketing deceptive appearance and material gain at the cost of eliminating Constitutional liberty and preventing people from buying and selling should they not worship the beast sin business greed. See, *Revelation 13:17* ("Thus no one was allowed to buy or sell things unless he bore the mark of the beast").

The Board proceedings also are used by judges who defer to private professionals' boards or standards and law makers who wrongly delegate the judicial authority to professionals in place of judges. So judges do not improve the world by judging professionals to prevent standards that oppress, harm human life, health or liberty.

I made Constitutional arguments against regulating the US Supreme Court by a Code of Ethics or disciplinary proceedings to prevent the Court from partiality towards the rules and persuading and pleasing those who regulate their seats by self-regulation or otherwise instead of the impartial application of the Constitutional rule of law to safeguard my 5th Amendment right to a fair proceedings, as a party of one, and other claimants whose claims are preempted by the regulations instead of the superseding Constitutional rule of law.

Regulating the Supreme Court, professionals and through other entities like the EPA violates my God's teachings against partiality in the Courts with bias towards the mark of the beast lawless lusts leading to hell business greed. It is my religious belief courts should judge in cases and controversies, not regulator professionals on Boards of Professional boards, third party regulators or even attorneys, professionals or judges by self-regulation. Nor should agencies judge like the EPA.

In 2016, I discovered non-attorneys out of state title companies practiced real estate law without an attorney license. After meetings with the real estate section of the DE Bar I discovered non attorneys were practicing law for decades messing up the chain of title on the deeds and costing taxpayers' money.

I contacted the Office of Disciplinary Counsel who did not help. I did not realize until they sued me that their jurisdiction was limited to lawyers not non licensed professionals and entities who practiced law without a license.

I also contacted law makers and the title commissioner in hopes to resolve the problem of non-attorneys practicing law.

The problem persisted. So, I ran for office in 2018 to resolve the problem. I discovered partial, corrupt lobbyists picked candidates to be their puppet. They did not pick me and asked me not to run.

I ran anyways. I did not know how evil the world was until I ran for office. I was willing to accept money from Democrats as a party because I am a Democrat. I did not think they could buy me because I was already theirs. I was wrong, and unhardened my head and heart by learning what Jesus the Christ mean in *Matthew* 6:1-4. I learned people sin leading to damnation in hell by fundraising, volunteering and organized charity unless they repent. I seek to repent.

In *Matthew* 6:1-4 Jesus teaches:

“Be careful not to practice your righteousness in front of others to be seen by them. If you do, you will have no reward from your Father in heaven. [meaning they will go to hell in the second death spoken of in *Revelation*]

“So when you give to the needy, do not announce it with trumpets, as the hypocrites do in the synagogues and on the streets, to be honored by others. Truly I tell you, they have received their reward in full. But when you give to the needy, do not let your left hand know what your right hand is doing, so that your giving may be in secret. Then your Father, who sees what is done in secret, will reward you.”

When I ran for office I learned organized charity taught giving out of one hand to get out of another such as a conditional collective interest, marketing, tax break or connections or good times taught people the mark of the beast-business greed was charity. Fundraising and collecting signatures drives out unconditional love and respect for one another from the hearts of man for the love of money and material gain. Since Jesus teaches in *Matthew* 6:24 “You cannot serve God and Money.” I did not want to sin against God or mislead others to sin to potentially be damned to hell on the last day at the resurrection of the dead.

So in 2019 and 2020 I sought permission to run against US House of Representatives Democratic Candidate Lisa Rochester without violating my religious beliefs. The democrats

said no. The Department of Elections said no. So, I sued them in the Delaware Chancery Court and attached the law suit in Kell v Trump and in this case with other documents in Kelly v Trump in DI 4 I incorporate herein by reference.

In 2018, the Democrats shipped in out of staters to prepare Biden to run. They had a pre-planned agenda I disagreed with. I proposed healthcare laws that would care for people by improving our bad care. It was as if democrat lobbyists preplanned the pandemic since they planned more bad care as I discussed in a newspaper article in DI 4.

I also proposed ways to reduce pollution to safeguard the environment to safeguard people. I disagreed with throwing money at problems to allow wrong doing charities and businesses to profit off of sustaining the problem to sustain their positions and profit streams.

As I attended more forums like the chambers of commerce where governors and other elected officials spoke I noticed that their agendas aligned to agendas spewed globally by the World Government Summit and World Economic Forum and other lobbyists who like Satan in Isaiah 14 and 1 John 5 sought ordered control over the world by eliminating free choice in a forced, fixed not fair economy. I believe we need just laws to prevent charities and businesses from oppressing, enslaving, killing, stealing and destroying human life, health or liberty to sustain profit, positions or powers. Unjust laws rule by economic, physical or social pressure as opposed to alleviating it. The Bible teaches damned to hell are those who pass unjust laws that oppress the weak should they not repent. Isaiah 10:1-2: I wanted to seek to alleviate the burden off the backs of the people not rule by it.

I learned of a plan to eliminate the government to eliminate the rule of law that restrains the government backed private and foreign partners under the lie of improving health and saving

the Earth only to sacrifice human life and liberty while destroying the Earth to sustain debt to sustain debt control, power, position and profit through the carbon debt credit plan.

There is a plan to eliminate the authority of the courts to eventually eliminate the rule of law that creates the government to eliminate the governments that restrain entities from enslaving the people to the conditional will of those who control the resources through unjust recoupment.

Preventing regulation of the US Supreme Court would help prevent the overthrow of the government by allowing judges to judge not the regulators who control the no longer independent branch to their dictates in order to maintain their seats.

As a Christian I have religious objections to debt. I incorporate my motion to file in forma pauperis herein by reference outlining my beliefs.

The 2030 and 2050 agendas rule over people by slavery debt in a carbon credit debit system where the governments are not control. The private central banks and those who coin money out of slavery debt are in control and rule instead of allowing governments to to govern and guide the misguided.

The 2030 plans allow the new corporate structure beneficial entities to use other people's money in investments to violate Jesus's commands in Matthew 6:1-4 by stating it is for charity or beneficial aims.

I believe the way money is coined now, the Babylon way, created out of enslaving people to debt to gain something the central banks and banks never had is a reason why Jesus teaches few people go to heaven. *See Matthew 7:13-15, Luke 13:23-28, also see, Isaiah 10:22* ("For

though your people, O Israel, be as the sand of the sea, A remnant of them will return; The destruction decreed shall overflow with righteousness.”)

I believe the way money is created and distributed also violates the 5th and 14th amendments Equal protections component and the 13th Amendment against involuntary servitude and the freedoms of the people from slavery debt in a forced unfair market where the government gives private and foreign partners loans they pay off by writing off debt as tax breaks, grants and government contracts in violation of the Equal protection’s component of the 5th and 14th Amendments.

I believe both the grantees and grantors of government contracts, grants and loans receive unjust gains spoken of by God in the bible leading to their certain damnation in hell should they not repent as they harm others in a forced not fair or free market which protects diverse ideas. Instead it standardizes all professional practices creating profit incentive as the aim at the cost of human sacrifice of life and liberty which is lawlessness leading to hell. See, Ezekiel 34:2-5, See, Proverbs 15:27,

I see grants and government contracts as bribes to gain government backing for government officials who exploit those they are charged to serve to serve themselves and their seats in violation of my religious beliefs especially since the Courts protect partiality towards political positions arguably in violation of equal protections based on view point of beliefs. I hate unjust case law that allows elected officials to disparately treat government contracts and grants. I seek to dissolve government partnerships with foreign and private partners to uphold the independence the government needs to govern and guide as opposed to collude with private and foreign entities allowing the private and foreign partners to be above the law because of the unclean hands of the purported guardians and executors of the law.

I desire the courts to judge not defer to professionals and experts thereby eliminating Equal Protections by partiality to lawless lusts I believe leading to damnation in hell by serving greed for wicked convenience and evil desire for productivity, security in positions or profit as opposed to justice as a matter of truth not as a matter of barter or exchange.

In sum, I discovered a plot to overthrow the government by allowing the governments private and foreign partners to take over the government authority to govern and guide until the government had no authority and the rule of law had no power to restrain those who controlled the resources from enslaving and harming not safeguarding the people the government serves.

I believe one way to prevent the schemed overthrow is to deem any person or entity who receives a government contract, loan, grant or delegated power like the federal reserve and the banks or other entities coining money, a government agent not protected by the Constitution namely the contracts clause but instead limited by it to preserve the people from being enslaved to debt the federal government owes and recoups by schemed foreclosures and other means.

This would prevent the government from enslaving the people by increases in taxes and carbon credits and debts to serve those the government owes or the people are deemed by the lie of stakeholder interest to owe.

The overthrow will happen as schemed by increase of real estate taxes and other taxes to lose tax revenue in bulk b pushing out people from their homes in a foreclosure boom to allow the government and banks to recoup the real property through liens to give it to those the government owes, those who receive unjust gains through government contracts, grants or delegation like the federal reserve.

In the Complaint in this case, I also proffered how to coin correctly without violating the people's Constitutional liberties in the same matter Presidents Lincoln, Jackson and Kennedy proposed which would prevent an economic model that would be used to eliminate the government sometime after 2050 per the Club of Rome's agenda.

I was ready to sue Biden and Yellen to make them coin correctly and to allow for a foundation of case law to prevent the overthrow if Congress defaulted on the debt limit while allowing one branch to be weakened the judiciary to prevent their ability to place checks on the other two branches. My goal was to protect the security of the nation, equal protections of my case, and place a seed in the hearts of this Court to prevent the lawlessness scheme that will allow for the overthrow of our government.

I believe I should be entitled to plead my case in the district Court so they courts may choose to save themselves or not, to hopefully save the only branch that safeguards our freedom from being eliminated by the vote.

I believe there is also a plan to eliminate freedom of religion through government backed partnerships I sought to dissolve to protect both the church and the state from dissolution

I believe I should be permitted to petition to safeguard my fundamental rights, licenses, and other claims in hopes to safeguard the public and the world from scheme lawlessness to safeguard not merely the Country from dissolution but the lives, liberty and eternal lives of all mankind.

19. Third Circuit denied Meghan Kelly motion to recuse Judge Phipps based on his partial interest in punishing me for suing Trump to secure a potential Supreme Court seat by Trump since he was a nominee for US Supreme Court and will likely be a nominee should Trump get reelected and based on relationships with Duquesne since I petitioned the law school about rats in 2005

On February 14, 2023 I moved to recuse Judge Phipps (“Phipps”) wherein I stated:

“1. Defendants admit in their letter sent to me on August 23, 2021, that my religious restoration act pleadings against former President Trump in the Delaware Chancery and Delaware Supreme Court are the source of the State’s interference, witness intimidation, and disciplinary case against me. Exhibit A

2. This letter was intended to intimidate me to cause me to forgo my right to petition by appeal the Delaware Supreme Court’s decision in Kelly v Trump. It did in fact intimidate me causing me to expedite as opposed to forgo my appeal in Kelly v Trump by mailing it out to the US Supreme Court later that same day, August 23, 2021.

3. Defendants admit that my religious beliefs contained in my petitions are the source of their disciplinary case in their disciplinary complaint against me at 7. Exhibit B.

4. My religious beliefs contained in my petitions to safeguard my religious belief includes my belief that Former President Trump reflects the image of the devil by conducting his life by lawless lusts and enticing the populace to give into temptations of their desires instead of using their free will, their brain, to do what is right.

5. I believe former President Trump misleads people to harm and hell under the guise of Godliness by enticing people to give into temptations to be controlled and enslaved by those who tempt their desires in violation of US Amend I, XIII.

6. I believe people serve lawlessness leading to damnation in hell when their eyes are focused on productivity, pleasure, position, profit, praise and power blinding their eyes from upholding justice by caring for the people while respecting their Constitutional liberties with the limit to refrain them from enslaving others to their will.

7. I believe people sin and serve lawlessness in violation of US Amend I and XIII when they look at people for what they may contribute materially or as products to buy and sell to use for material gain instead of people to respect, unearned required.

8. I believe the mark of children of the devil not yet adopted by God is business greed. I believe that every government official whose eyes are on jobs, the economy and money enslave the people in violation of US Amend XIII. Jesus teaches people who do business or their job as worship are not welcome into heaven. Citing John 2:16. Worshipping employees, employers, businesses and job creation leads to damnation in hell in a fixed subpar economy with poor products and services and defamation laws which stifle innovation created by honest criticism which helps us improve. Worshipping the beast, business greed eliminates freedom by teaching people to look at everyone and everything to buy or barter or sell instead of as a free people. US Amend XIII.

9. I believe the lawless way Congress gave away its Article 1 Section 8 coining power to the private bank the federal reserve unnaturally enslaves the government who in turns enslaves the people to debt and debt on interest.

10. This Babylon way of coining the Federal Reserve adopted from the Bank of England eliminates freedom of many in a selective master slave state in contravention of the 5th Amendment's Equal protections component by disparately treating people in a fixed, not free economy based on material bartering not minds which improves products and services.

11. The Court appears to be enslaved to serve lawlessness under the color of the law when its focus is on business productivity, money and saving of costs as opposed to equal access to truth under the impartial rule of law not bent towards material gain, but towards equal access towards the law with limits on government official conduct to protect freedom of citizens.

12. If money was coined lawfully without US Amend XIII, the court would not be tempted towards partiality towards funding its seats or the government. Government funding would not be in an issue if the government took back the coining power from the federal reserve and the banks.

13. Banks used to be able to lend out or invest up to 90 percent of people's deposits. That has changed to 100 percent which places people's money in the bank in a precarious situation.

13. I believe the elimination of the fiat dollar will be used to eliminate the courts as money is schemed to be coined in a far more oppressive manner, so as to dispense of the need of judges by making the central banks above the law and the judge of all things in the years to come if schemes are not unraveled by the courts before the courts are unraveled.

14. I do believe the courts are in danger. I am seeking to save not destroy them.

15. It is my religious belief former President Trump reflects this lawlessness based on partial lusts, misleading people to attack me and others giving the rise of government sponsored private persecution based on perceived religious-political beliefs, speech, petitions or association.

16. The Honorable Peter J. Phipps was twice appointed a nominee to the US Supreme Court by former President Trump.

17. I forgot that the Honorable Peter J. Phipps was twice a nominee by President Trump to be placed on the United States Supreme Court.

18. I actually wrote the Honorable Master Patricia Griffin of the Delaware Chancery Court that I was concerned about being heard by Justice Phipps and other Trump appointees in Kelly v Trump in the attached letter dated October 19, 2020, I incorporated herein as Exhibit C.

19. The temptation to be partial towards the President who may give Justice Phipps a seat at the US Supreme Court creates partiality or the appearance of partiality.

20. I seek to overturn Kelly v Trump based on voidable or void subject matter jurisdiction for procedural due process violations, some of which I was not aware of until after both Kelly v Trump and the Disciplinary hearing, including but not limited to the sealing of my petitions regarding other procedural Due Process violations, without being afforded notice or an opportunity to be heard, and the firing of material witnesses Court staff, by the Delaware Supreme Court's agent which appeared to have happened before the conclusion of Kelly v Trump.

21. Former President Trump seeks to run for President of the United States.

22. Former President Trump may get nominated.

23. Justice Phipps may unknowingly be partial towards the man who twice chose him to be on a list of nominees to the US Supreme Court since Former President Trump may be reelected and would then likely nominate Justice Phipps again should another vacancy at the US Supreme Court occur.

24. In addition, I would sue President Trump again to keep my God's name holy not used for the vanity of politicians by establishing government religion with every blasphemous word or dollar in the bought and bartered for union of church and state, not based on freedom but making speech and power for sale, while the many are for sales slaves in contravention of US Amend XIII and my religious beliefs in Jesus and against debt so as not to go to hell.

25. Justice Phipps appears a respectable judge. My genuine religious beliefs that former President Trump reflects evil not good is not upon Judge Phipps.

26. Nevertheless, I move this Court to recuse the Honorable Justice Phips to preserve impartiality needed to protect my 5th Amendment procedural Due Process rights, my property interests in my licenses to practice law, my exercise of fundamental rights, and my right to petition to seek redressability for their violations before the courts.

Wherefore, I pray this Court grants this motion" DI 3DI 142

On 2/15/2023 I supplemented the complaint in 3DI 143 noting:

"...I called my case manager to confirm I required to file documents on this Court's record in order to comply with the US Supreme Court's Rule 26 (8) to eliminate costs and dispense of the need for a record. She directed me to contact the US Supreme Court, not this Court with US Supreme Court procedural questions.

The US Supreme Court has not addressed this question I asked them, and indicates file things. If I get it wrong, they will let me know after I file them.

I believe the US Supreme Court incorrectly rejected a filing in 22-6582 while refraining from referring to Supreme Court Rule 43, while noting the reason Rule 28 motions for exemptions should be included in the motion to file in forma pauperis.

I have electronic records of all filings rejected and accepted, except this one became missing when it was rejected. This was strange. See, Exhibit A attached hereto.

I am scared. People have talked about shooting me, made threats against me, thrown things at my vehicle based on my perceived religious political beliefs, speech or affiliation. This violence against me stems in the government's establishment of government religion in the mark of the beast, business greed, as Godly and good. Worship of the beast eliminates freedom by making everything and everyone a product to buy, barter or sell, instead of serve and care for as opposed to control. I am a Christian. I associate as a Catholic and a Democrat, but I place my faith in God, not man. I independently critically think and make no man my master and God, but God. My love for humanity and God unearned is not what this misguided world teaches. Yet, the First Amendment should protect my unpopular beliefs in Jesus's teachings.

Every day I face irreparable injury, loss of my license to buy and sell but for my belief in Jesus Christ.

I sought to petition the US Supreme Court for help in this matter on February 6, 2023. The US Supreme Court received my pleadings on February 8, 2023. It is more than a week since it was physically received. Yet, I see no notation of acceptance or rejection on the United States Supreme Court's electronic filing system.

The post office lost track of my Emergency Motion. Per the attached tracking my Emergency motion was received Monday February 13, 2022. (Exhibit B)

I am scared. Justice Phipps taught as an adjunct professor at Duquesne, the School. (Exhibit C) On the record below, I pled Duquesne increased my rent in retaliation for complaining about rat babies at my school apartment. I incorporate my complaints from DI 2, and in the exhibits thereto at DI 3 and 4, and in the video contained on the jump stick of me on TV at Duquesne.

Duquesne is a Catholic School. It is weird that my Constitutional law School Professor used the same secretary as Third Circuit Court of Appeals Judge Thomas Hardiman, and it appears he may have assisted my schoolmate Bill Stickman to receive a federal judicial position. He may have helped Justice Phipps get appointed too. After all, schools help their students and faculty gain employment. I incorporate herein by reference Exhibit C.

I do not believe it is right and just to gain money, power and position based on who you know as opposed to how you serve, even if that is what is taught to kids in schools. In the pictures President Gormley helped Judge Phipps, and Bill Stickman. President Gormley also helped Judge Hardiman. He helped me too. It doesn't make it right or make me more worthy of a position based on the connections I have. I wish the Courts would judge people correctly independent of association to respect individual liberties. Citing Jesus, John 7:24.

President Gormley vouched for my US Supreme Court admissions too. So, my hands may be unclean in this statement, and yet I am required to have the

testimony of one or two in order to gain admissions to the bar. There was no testimony of outside witnesses to place my licenses on inactive disabled. This is not fair.

I am concerned about Catholic institutions, including my law school Duquesne School of law, receiving government aid or collaborating with the government creating government belief through bartered for partnerships.

I am from Lower Delaware. Some folks down here think Catholics go to hell and the Pope is the Anti-Christ. Do I believe this, no, but I respect people's freedom to believe. I do not respect their threats of violence towards me or others based on such belief. That is where the law must protect not collude in such violence. This dangerous union of church and state may get innocent people like me killed, as a Catholic, democrat independent critically thinking human.

I am scared. I filed Kelly v Trump because my faith in Jesus is the most important thing I have, and hold in my heart even if lose everything, even my life. I should not get into trouble for asking the government to respect the law instead of violating the law for money and material gain. People I love may disagree with my desire to create a wall between church and state. I seek a wall to safeguard both the church and the state, the union of which is based on a foundation of sand of money not liberty which will make this house fall down in times of turmoil. Citing, Jesus, Matthew 7:26-30.

I called the Delaware District Court and confirmed I must place the Delaware District court exhibits and other Complaint exhibits on this Court's docket in order to plead on the Record per Supreme Court Rule 26 (8) to eliminate costs.

Thank you. I hope I am not denied the opportunity to be heard at the US Supreme Court. I hope at least they docket my pleadings." 3DI 143

The Court denied my Motion to recuse him and allowed him to preside as Judge in the other Third Circuit 22-3372 of an appeal Judge Diamond's orders in the Eastern District Court of PA matter wallowing Defendants attorney to create bias without allowing me an opportunity to be heard or cross examine their false allegations where any normal ordinary person would be prejudiced against me in hopes to gain a seat at the highest seat in the World the US Supreme Court.

The conflict of interests violates due process.

20. Third Circuit denied Meghan Kelly motion to recuse Judge Scirica based on my pleadings against attorney disciplinary rules and regulations which mimic the rules he drafts, and regulations of the US Supreme Court and federal Courts by eliminating the rules he is the appointed chair on drafting to prevent US Supreme Court regulation, Constitutional arguments against

On June 8, 2023 I moved to recuse Judge Scirica by stating:

“I Meghan Kelly, pursuant to FRAppP Rule 27, my 5th Amendment right to a fair trial to defend the exercise of my private 1st Amendment rights of petitioning, speech, religious belief, exercise, and association, 28 U.S. Code §§ 144 and 455, 29 CFR § 2200.68, or other applicable law move for the recusal and to prevent the participation of the Honorable Judge Anthony J. Scirica in this case.

1. I asked opposing counsel for her stance per the attached Exhibit A. She has not objected.

2. I requested a panel rehearing of the original panel.

3. The Honorable Judge Anthony J. Scirica is on the original panel.

4. Judge Scirica has a conflict of interest with my case I was not aware of until after I filed my motion for a rehearing on June 3, 2023. (Third Circuit Docket Item (“3DI”) 3DI-199

3. I have stumbled upon evidence the Honorable Judge Anthony J. Scirica appears to be the former chair of the Executive Committee of the Judicial Conference of the United States, former chair of the Standing Committee on rules of Practice and Procedure of the Judicial Conference of the United States and was a member of the Advisory Committee on Civil rules. The Honorable Judge Scirica currently chairs the Committee on Judicial Conduct and Disability and is a member of the Committee on International Relations. I attach, and incorporate herein as affidavit 41 as necessary information providing evidence I incorporate herein, at District Court Docket Items (“DI”) DI 149, as an exhibit hereto.

5. To my horror I discovered Judge Scirica is the current Chair

I believe there is an attack on judges to eliminate the judiciary to eliminate the rule of law, as I mentioned previously.

6. Should judges give into the temptation to behave as cowards and defensive, they will be controlled by those who entice their desires not free to uphold the freedoms of the people by the impartial application of the Constitution on the rule of law.

7. I believe the courts must limit the purview of correcting judges to the purview of the Constitutional limits without waiver, 1. Cases and controversies such as mine, 2. or impeachment, to preserve these United States from schemed overthrow.

8. I am terrified, absolutely mortified that one of the reviewing judges is in charge of the rules disciplining the federal judges. I believe such rules guarantee injustice by judges who fear punishment and seek to uphold the mere rules to the extent they compromise the impartial rule of law.

9. I believe regulations will be used to assist the other two branches to exceed the Constitutional limits to impeach and control a no longer free, independent and impartial judiciary. This may be used to eliminate the courts down the line if left unstopped.

10. The fact I argued on the record below, my desire to eliminate or prevent disciplinary rules of federal judges and the United States Supreme Court creates a conflict of interest.

11. I also argue certain disciplinary rules violate the Constitution and create injustice and constitutional violations leading to harm, and though not states below certain damnation in hell.

12. My case is not about vengeance, but correcting and protecting the Defendants and those they misguidedly harm, including my colleague. My colleague Richard Abbott, Esq. appears to be in trouble for requiring the government adhere to the impartial rule of law, including a county and the members of the Delaware Supreme Court without disparate economic treatment arguably in violation of the Equal Protections Clause applicable to state and county governments via the 14th Amendment.

13. I seek to preserve the Constitution, the rule of law, and the government from schemed very real threats of dissolution and demise.

14. Thank you for your time. I write in haste with anguish, because my voice may be cancelled out and eliminated by even the United States Supreme Court by concealing my pleadings too. I incorporate herein by reference. DI-121-DI-154.

15. This Court may guide even misguided judges to preserve the rule of law.

16. I believe this Court may preserve these United States should it only care to entertain the individual liberty interest of those who do not conform to the standardized beliefs and conduct of the alleged norm, like me.

17. No disciplinary rules or regulations should control the federal judiciary. Disciplinary rules and regulations create injustice by tempting federal judges to partiality towards Disciplinary Rules or tempts them to act with favoritism towards those who administer or draft the rules, making judges puppets not independent critically thinking discerners of the facts as applied to the Constitutional laws which safeguard life and liberty. The fear of punishment for alleged violation of disciplinary rules interferes with judges' capacity to independently administer the impartial application of the Constitution to the superseding rule of law upon the people and other two branches. Disciplinary rules creates injustice and allows judges to be set up as I have been set up for the partial whims of a vindictive Delaware Supreme Court which abused its discretion to serve its unconstitutional unrestrained lusts.

18. Other branches may not eliminate the only check the courts have upon the other two branches by regulating the Constitution away which preserves our rights, the people's rights, not merely the Court's rights and duties. **The argument the Courts may waive their right to self-incrimination by waiving the 5th does not allow them to waive the rights of the people of the substantial burden the disciplinary rules will have and have upon their equal protections by the courts.** The Court may not waive the rights of the people only to be deceived into placing the United States Supreme Court under a greater microscope and certain horse and pony impeachment shows to get misbehaving men election seats. This makes a mockery of the courts and justice.

19. **I argue below consistently the Supreme Court and federal judges must only be corrected within the purview of the Constitution's provisions of 1. Cases and controversies like my case, or impeachment to preserve the Court and prevent the planned attacks that will be used to eliminate the rule of law and government if the courts do not stop it. The courts must not waive the Constitutional limits by allowing disciplinary rules and regulations to preserve the impartiality of the courts to safeguard the Constitutional freedom of the people. The disciplinary rules compromises the partiality of the integrity of judges making them partial to disciplinary rules or those who control or administer them instead of the impartial application of the Constitution to the rule of law.**

20. I used my case for problems with the Courts within the purview of cases and controversies to prevent harm. For example, I have a problem with the United States Supreme Court docketing my pleadings. I have previously drafted a motion to place exhibits on the docket of my PA Appeal. Kelly v PA ODC, 22A981. Then, I had problems searching and viewing the docket. So, the public may also have a problem. The reasons for the problem may be a human mistake or by intentional vindictive design in violation of the First Amendment with the goal of dissuading me from petitioning the courts and the 6th Amendment right to public record and the Equal Protections Clause as applied to me because of disparate treatment by the US Supreme Court. The proper place to remedy any harm is by going to the one who may have committed the alleged mistakes or misconduct directly. If that does not work the proper place is the court in my case to correct mistakes or misconduct, not disciplinary cases by those who seek to control a no longer free and independent court. Those who enforce or apply disciplinary rules serve business greed not good by upholding what is not for sale, freedom. These rules eliminate justice. The Disciplinary rules create the deception of maintaining a standard to care for the people, when it merely cares for profit and position allowing misconduct to continue in a standardized more massive way. Deferring to standardized rules and conduct within a profession allows harmful and even deadly conduct and standardized care or products to be above correction. The Courts tend to misbehave by deferring to alleged experts, scientists and professionals, essentially colluding with them to eliminate freedom in favor of making a no longer free people for sale.

21. Standards also allow the automation and elimination of people judges and people lawyers under the lie sameness is fairness and equality when it is elimination of Equal protections under the Constitution which protects every freedom to think, believe and act according to the religious dictates of one's own conscience when religious beliefs do not fit in the box of standards the algorithms permit.

22. While, I saw this conflict may be an opportunity to argue certain Federal Rules are unconstitutional in passim, such as the disparate favorable treatment the federal rules grant federal officials, agents and employees in that they have a longer period to respond to a complaint 60 days. Whereas common people like me are afforded fewer days to respond to a complaint arguably in violation of the Equal Protections Component of the 5th Amendment applicable to the federal government with no rational basis, but an evil one, valuing convenience, and business weightier than the Constitution and federal rights of citizens, the prejudice is too great for this slight potential opportunity to make our system more just, fair and free.

22. While the courts are granted statutory authority under the Rules Enabling Act Rules Enabling Act, and amendments thereto 28 U.S.C. § 2071-2077, the Court limited that power within the rules and by case law. “No rule can enlarge or restrict jurisdiction. Nor can a rule abrogate or modify substantive case law.” The federal courts acceptance of disciplinary rules abrogates substantive case law by guaranteeing injustice not equal application of the rule of law by their own sinful vanities to sustain their seats. US Amend V, XIV (Equal Protections)

23. On an aside, I am a Christian. I believe people commit lawlessness called sin when they train others to seek money and material things Jesus Christ calls Mammon as God, savior, master or guide in their life. Matthew 6:24. I believe sin is lawlessness leading to damnation in the fires of hell despite ignorance, should people not repent. See, Bible 2 Corinthians 4:4, Matthew 13. I do not want people, even judges to go to hell for their confusion, nor do I want them to sacrifice people’s lives or Constitutional liberties for material gain of the alleged many or the few. That is the same lawless lusts those in ancient religions committed when they sacrificed humans in secular-religious worship for material gain or better crops. Under the similarly false belief many unjust policies, rules, regulations or laws in the US sacrifice, exploit and oppress the poor so some may get as much as they can for as little as they can while teaching the poor and middle class to praise the conniving, not smart oppressors. Constitutional challenges to such government conduct must be permitted under the Equal Protections arguments and arguments against involuntary government backed slavery under the 13th Amendment.

24. Government grants and contracts are repugnant to me. It is the same as throwing people in a volcano for a false God Money and mammon when the Courts sacrifice the poor under the lie job creation is savior. See Romans 4:4 where I believe God scolds us that job creation is not charity or good. I believe those who create jobs, like President Biden alleges, and train people to be their colluding private partners trained slave in a fixed not free subpar economy by education from kindergarden through 12th grade enslave the people to their dictates. I believe they serve Satan and will go to hell if left uncorrected or unrepented by government backing or charitable backing. Courts should save lives and eternal lives, not throw them into the fire to burn or sacrifice the weak, the poor, the lame like a wolfpack eating not tending the sheep. Such educational goals do not safeguard freedom, but eliminate it by government backed forced control in contravention of the 13th Amendment. The value of the human is not based on business, money, marketing or material gain, but is immeasurable. God calls the disparate favoritism by government contracts and such unjust gains, which I believe arguably violates the Equal Protections Clause component of the 5th when the federal government backs by words or grants, contracts, marketing material support in an unequal fixed slave not free market. See Romans 4:4, Matthew 6:1-4. I believe lawyers, even lawyers labeled disabled have a duty to uphold Constitutional liberties from being sacrificed for material gain under the lie of the common good, the deception the vote is a waiver of every other Constitutional liberty or the lie of saving the world.

25. There is a new replacement economy which will use the lie of saving the world only to manufacture harm to control it under the new carbon credit debt system. The arguments I make under the equal protections clause and the 13th Amendment against government contracts and grants to entities should be made to prevent the fixed,

slave, controlled market that will eliminate every single one of our Constitutional freedoms by eliminating the courts and governments authority to restrain entities who will rule of control of resources, not based on just decrees.

26. The new economy will be replaced again to eliminate the government and the rules of law that restrain businesses and charities from harming, oppressing, killing, stealing and destroying human life and human liberty under the lie of the common good if the courts do not stop it. I attach DI 147, and an additional article in hopes this Court may see through the government backed private partners lobbyists plans.

27. One way to prevent the schemed attacks on the courts is to prevent them from getting set-up to fall by preventing regulating the US Supreme Court, and to allow cases including mine to correct the Court. Please see DI-121-DI 154 to see when I have concern with the Supreme Court I go to them the Court or other courts to correct it in the open. Going behind their backs in a secret Board or agency proceeding, when it may be based on mere misunderstanding creates injustice, confusion, and biased administration of the rule of law by those who destroy Constitutional liberties in favor of the mark of lawlessness leading to certain damnation in hell, the mark of the beast, business greed. The secret disciplinary proceedings dumbly mercilessly destroys people, making professionals dumbed down puppets, not free to use their own brains to improve care to serve people as opposed to the profession's wicked desire to market, gain profit, power and maintain positions. DI 77-79

28. **I seek to eliminate the disciplinary rules Judge Scirica is charged to care for. There is a conflict of interest. While I made an argument against the disciplinary rules below, I also have constitutional arguments against a number of specific Delaware Disciplinary Rules beyond the arguments made below I must be afforded an opportunity to make so as not to violate my procedural due process opportunity to be heard and the right to petition.**

29. Due process is violated by allowing a judge who is charged with drafting or improving disciplinary rules which mimic state rules I seek to make Constitutional arguments against. Judge Scirica's inherent bias and a personal interest against part of my case since Judge Scirica likely takes special care in revising the rules I will attack. There is bias against my arguments based on a personal stake he will subconsciously defend. There is an appearance of impartiality regarding arguments attacking something he personally worked hard to create.

30. I write in haste. Please excuse any typos because I do not want the Honorable Judge Scirica to needlessly invest time in reviewing my motion for a rehearing before the original panel, nor do I desire to waive my rights by asserting them too late. I apologize. I am a poor typist.

Wherefore, I pray this Court grants this motion" (emphasis intended, Citing, 3DI-200).

I filed two Motions for caveats for the motion to recuse Judge Scirica. On June 9, 2023, I filed motion for a caveat to her Motion for this Court to recuse Judge Scirica to move him for judicial consideration of drafting laws to prevent non-lawyers and non-judges from practicing law or taking the place of people judges without government authority, wherein I stated:

“I Meghan Kelly, Esq., pursuant to Fed. R. App. P. 27, move to include a caveat to Petitioner’s motion for this Court to recuse Judge Scirica and move him for judicial consideration of drafting laws to prevent non-lawyers and non-judges from practicing law or taking the place of people judges without government authority.

1. I ran for State local office in 2018 because no one would do anything about the rampant problem we have here in Delaware. Non-attorneys-out of state title companies are practicing real estate law without a license to practice law.
2. I lost, but I care because this is bigger than Delaware. I have uncovered a plan that intends to allow those who control entities through technology to practice law, judge and govern without authority by the people or the law.
3. DE Office of Disciplinary Counsel did not help lawyers, or help me when I complained about the problem of non-lawyers practicing law without a license back in 2016. I did not know why until they sued me. I was compelled to read their rules of limited jurisdiction before the Board, which does not allow my federal claims, nor does it give office of disciplinary counsel in Delaware or Pennsylvania subject matter jurisdiction to discipline, correct or protect nonlawyers and nonjudges from acting as judges and attorneys without a license.
4. The plan in the schemed overthrow is to allow entities to behave above the law, above correction from the government, to take over government to eliminate it down the line.
5. Per the attached two email I sent opposing counsel, Walmart and businesses are already governing without election or government authority restricting my right to buy and sell.
6. Since the overthrow and unnatural fall of the US is based on nonlawyers and nonjudges lawyering and judging without government authority I thought it imperative to seek Judge Scirica’s consideration of drafting laws to prevent nonjudges from taking the place of judges, even by controlling automation. Non-people courts already exist in China.
7. I attach an affidavit I filed in Delaware District court for this Court’s consideration.

8. I was alarmed lobbyists wrote Judge Scirica to lobby control over the rules controlling the Judiciary, the only impartial branch. (Exhibit E to the Affidavit.)
9. In Exhibit E to the attached affidavit, you will find their letter. What makes this even more alarming is they lobbied to allow non-attorneys to practice law without a license.
10. Should this not be stopped, the rule of law will be eliminated, our government may fall as schemed.
11. I should like the Honorable Judge Scirica's consideration of this narrow issue. I respectfully request he consider whether he may draft laws to prevent non attorneys from practicing law or judging in the place of people judges without government authority.
12. I pray Judge Scirica considers drafting federal rules granting state Office of disciplinary counsel through federal law authority to discipline and correct non-lawyers from acting as lawyers on behalf of another, as opposed to pro se.
13. I pray Judge Scirica drafts federal disciplinary rules to prevent nonjudges from taking the place of judges by giving the U Attorney General or/and state Office of Disciplinary Counsel authority to prevent the schemed elimination of people judges by automation." (Citing, 3DI 201)

On June 15, 2023 I filed a Second caveat to her Motion for this Court to recuse Judge Scirica to move him for judicial consideration of drafting laws to prevent judges from speaking engagements on behalf of political think tanks such as the lobbyists at the Federalist Society wherein I averred:

"I Meghan Kelly, Esq., pursuant to Fed. R. App. P. 27, and US Const Amendments I, and V move to include a Second caveat to Petitioner's motion for this Court to recuse Judge Scirica and move him for judicial consideration of drafting laws to prevent judges from speaking engagements on behalf of political think tanks such as the lobbyists at the Federalist Society.

1. The Honorable Judge Anthony J. Scirica is the Chair for the federal rules to discipline federal judges.
2. It has come to my attention a number of federal judges create the appearance of bias or the actual partiality towards political beliefs of the political think tank with whom not all citizens agree, the Federalist Society. (Exhibits A, B, C)
3. Judges should remain impartial. I was uncomfortable when the Honorable Justice Ruth Ginsberg spoke out on political beliefs. (Exhibit D) Justice Ginsberg likely chilled the political beliefs of those who think differently than she. I am similarly uncomfortable when Federal Judges speak at partial political forums.

4. Individual exercise of Constitutional freedom is chilled when the only impartial government branch, the judiciary engages in partial, biased, politicking, association, support and speaking engagements.
5. The First Amendment of the US Constitution protects citizens' freedom to associate without disparate unequal favoritism by the courts towards certain associations and disparate treatments towards individuals whose ideology do not conform towards the courts favored lobbyists associations including the Federalist Society. (US Amend V, Equal Protections Component, and procedural Due Process protections of a fair not politically biased proceeding)
6. While I oppose regulating federal judges through federal rules, it appears the alleged potentially unconstitutional acts of the judiciary are left unchecked by the purview of the limits on judicial conduct by cases or controversies or impeachment.
7. Federal Judges should have more limited rights under the First Amendment in order to uphold and not chill the Constitutional freedoms of those they are charged to serve.
8. I respectfully move Judge Scirica for judicial consideration of drafting rules to prevent judges from speaking engagements on behalf of political think tanks such as the lobbyists at the Federalist Society and other political organizations or entities to protect the impartiality of the courts.
9. I believe attorneys, even attorneys labeled disabled have a duty to require the impartiality of the courts, not the mere appearance, but actual impartiality of the courts within the purview of the Constitutional limits to prevent favoritism towards the partial political interests of lobbyists like the Federalist Society. Judicial opinions and dissents should speak for themselves without encouraging favoritism towards certain viewpoints in lawsuits through judicial lobbying by speaking engagements or lobbyist groups.
10. My religious beliefs require I uphold the impartiality of the courts as a religious exercise as a party of one. (See. Deuteronomy 1:16-17, "...Hear the disputes between your brothers, and judge fairly between a man and his brother or a foreign resident. Show no partiality in judging; hear both small and great alike....")

21. Justice Alito denied 30 day extension required to draft this appeal prejudicing my ability to appeal. Kelly would consider retaining another attorney who got into trouble for doing the right thing so long as I do not go into debt which violates my religious beliefs

Defendants' placing my license on inactive disabled has inhibited my capacity to seek to regain my position at my former law firm. I believe government officials violate the 13th Amendment by compelling people to serve Satan by seeking money as God by forced not free choice to work to pay off compelled debt which I do not agree to. I have very genuine religious objections to debt. I did not exchange my soul for money to lose it in hell by debt by making

mammon God. I believe Jesus when he teaches you can not make God and money and material gain as guide in life. Matthew 6:24. I assert my right against debt and involuntary servitude to pay off debt as against my First Amendment religious beliefs, exercise of religious beliefs and the 13th Amendment and my 5th Amendment right to access to the courts and my First Amendment right to petition in defense of my claims below. Government should coin money to protect the freedom of the people to buy and sell by free choice not by oppression and government compelled forced choice by extracting labor and wealth by the lawless way money is coined and distributed by unjust gains through grants, aide, loans, contracts executive orders or treaties in a fixed forced unfair subpar market where made to break, repair, borrow, disintegrate goods that enslave people to debt to pay for wicked evil job creation in a forced market to pay for service of shoddy by design goods. Bad business is rewarded instead of prevented by just law suits because judges and other government agents choose to sin against God and man by deferring to science, professionals and experts or their standards instead of improving them by Court correction. *Romans* 1:25. Judges also violate Equal Protection by partiality and bias towards experts and professionals or their standards than those they oppress, enslave or harm by committing human sacrifice of life, health or liberty for mammon.. US Amend. V, XIV. There is a worse way money will be coined under the 2030 plans to enslave not to safeguard liberty on a far more heinous level.

I am compelled to assert rights imperfectly and in full under the fear of God that this Court also sue me based on disdain of my religious beliefs in many things the government condones, requires or causes is sin or my assertion of religious beliefs by seeking waivers against compelled violations of my belief in Jesus. I keep myself separate by not doing what I believe is sin even if it is praised as lawful or good. I have to send something out to assert and not waive

my rights or I have none. I am prejudiced by Justice Alito's denial of my request for more time under the circumstances.

I have limited ability to print, research, travel by car because poverty creates a substantial burden on preparation and fair access to this court. In fact I cannot afford the time for my super slow printer or the ink or paper to even reprint the documents. I see typos and I cannot afford to pay for paper to reprint as I rush to assert my right to religious belief without losing my ability to buy and sell because I do not worship the beast 666 by glorifying man and man's creation as guide and God and the punishments outlined in Genesis 3 as the reason to live which teaches pride damning people to hell instead of humility and edification the punishments of original sin were intended to be to save their souls from damnation. Genesis 3.

There is another attorney I read about in a case, Richard Abbott, Esq. He was threatened with punishment by the Defendants for asserting the rights of those he represents from government violations, misconduct or mistakes. He was in trouble for doing the correct thing holding the government to the Constitutional application of the rule of law that limits their authority.

Although Jesus Christ teaches me to allow the holy spirit to be my advocate when I am brought to the Court unjustly for my religious beliefs, I am bringing this civil rights case to safeguard my 1st Amendment private rights to speech, petition, religious belief, exercise of religious belief, and association, 6th Amendment right to self-represent, and cross examine my accusers, 1st, 5th and 14th Amendment right to a fair impartial proceeding, damages and nominal relief for intentional or reckless emotional distress, economic harm, other ancillary claims, my license to buy and sell without restrictions based on my exercise of religious belief, equitable relief and other claims.

I require the courts hold the government agents to serve people and protect liberty, not enslave the people under the lie of freedom to serve partial business greed by backing of government partners who are rendered above the law. I understand it is attorneys' fault, including my fault if no one asks the court to uphold the Constitution. So I ask or request the ability to ask the court below to safeguard these United States from schemed dissolution.

It is the Courts and the rule of law not money or might that hold this country together as a free people. It is the courts and people judges who are my hope and the world's hope of a hero.

**B. SUMMARY OF APPLICATION OF FACTS ABOVE TO THE LAW PLUS
ADDITIONAL REBUTTAL OF THIRD CIRCUIT'S FINDINGS**

This case arises from Defendants, the Delaware Supreme Court and the arms of the Court's interference in my RFRA law suit against former President Donald J. Trump made with the intent an 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 and my petitions to correct and stop Court misconduct.⁴¹

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

⁴¹ (DI 2-4, Exhibits A-D, App 1-B, 1-C, 1-D)

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, including evidence I discovered after the case concluded including sealing A-4 A-5 and firing witnesses in my favor, Court staff writing on praecipes, instructing me to cross off the address to prevent service, misleading me to miss an appeal date, sending Judge Kenneth Clark to attack me at a store, along with sending threatening letters through DE-Lapp and DE ODC in hopes to get me to drop my case. The fact I did not serve local counsel based on the misconduct or mistakes of the Court's staff in preventing service does not prevent making the case void or voidable on subject matter grounds due to procedural Due Process Violations so great as to deprive me of a fair proceeding. 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).

The Court abused its discretion by dismissing my appeal in part as moot, since the issue of enjoining an unlawful proceeding is capable of repetition yet evading review.

The Court committed clear error of law, of fact, creating manifest injustice, by dismissing under the initial complaint under Younger.

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. Younger does not apply to my claims for violations of my right to petition for bar dues, the right to petition in Kelly v Trump, Equal protections claims for damages, nominal damages constitutional arguments against the disciplinary rules, proceeding and 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 include additional arguments to prevent

manifest injustice that shocks the conscience in terms of loss of procedural Due process violations that make the findings in Kelly v Trump and the Disciplinary void or voidable, 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, 6th, 5th, 13th and 14th Amendment rights, creating loss of First Amendment rights and my interest in my ability to work in my profession.

The District Court and the Third Circuit Panel (collectively and individually also referred herein as “Court”) abused its discretion by affirming the District Court’s judgments at District Court Docket Item Number (Hereinafter “DI”) DI-16-17, DI-30-31, DI-59-60.

I showed availability of new evidence, clear error of law, clear error of fact, evidence of Defendants harassment and bad faith causing manifest injustice requiring the orders below be vacated and the case be remanded to the District Court. Moreover, even without the new evidence contained in the motions of reconsideration and other motions the Court errs in affirming the judgments below dismissing based on Younger. DI-2-16.

Appellate Court errs as a matter of law in finding no legal bar in presenting my claims before the state forum. The Disciplinary proceeding forbids asserting my claims for damages, nominal relief and equitable relief against the Defendants and State court under the state disciplinary proceeding. The proceeding is limited in subject matter jurisdiction under Del. Disc. Rule 1(a), 5, 8, 10.

Del. Disc. Rule 5 limits jurisdiction to disciplining attorneys to

“Rule 5. Jurisdiction.

(a) Lawyers admitted to practice. Any lawyer admitted to practice law

in this jurisdiction, including any formerly admitted lawyer with respect to acts committed prior to suspension, disbarment, transfer to inactive status or retirement, or with respect to later acts which amount to the practice of law or constitute a violation of these Rules or of the Delaware Lawyers' Rules of Professional Conduct, or any rules or code the Court adopts later; any lawyer specially admitted by a court of this jurisdiction for a particular proceeding; and any lawyer not admitted in this jurisdiction who practices law or renders or offers to render any legal services in this jurisdiction, is subject to this Court and the Board's disciplinary jurisdiction."

The claims for damages, nominal damages and equitable relief are prohibited and not within the scope of the Board's jurisdiction, including the claims for damages in my initial complaint. See, *In re a Member of the Bar of the Supreme Court, of the State Enna*, 971 A.2d 110, 125 (Del. 2009), regarding limited jurisdiction. Moreover, even if the State Court entertained my claims, my procedural due process rights are violated by a partial, unfair, biased forum. US Amend I, XIV. The Federal Forum is the only forum which has jurisdiction over my claims. The Supreme Court had no jurisdiction to resolve claims for damages, nominal relief and equitable relief against the state and itself in a disciplinary proceeding. This creates a bar. The lack of personal jurisdiction over the Delaware Supreme Court members which violates the 14th Amendment also places a bar to my claims in the state proceeding. Allowing the State Court to rule in its own favor in a partial forum offends the notions of fairness and jurisdiction apparently may be upheld under the Fourteenth Amendment Due process Clause applicable to the Defendants and the state Court. The Delaware Supreme Court does not have personal jurisdiction over its own alleged Constitutional and federal violations wherein it is the judge and party. *Ins. Corp. of Ir. v. Compagnie Des Bauxites De Guinee*, 456 U.S. 694 702-03 (1982) ("The requirement that a court have personal jurisdiction flows not from Art. III, but from the Due Process Clause. US Amend XIV. The personal jurisdiction requirement recognizes and protects an individual liberty interest. It represents a restriction on judicial power not as a matter

of sovereignty, but as a matter of individual liberty. Thus, the test for personal jurisdiction requires that "the maintenance of the suit . . . not offend 'traditional notions of fair play and substantial justice.'" *International Shoe Co. v. Washington*, 326 U.S. 310, 316 (1945).

The Court abused its discretion by denying the additional deprivation of Constitutional liberties that arose since the filing of the petition that I placed on the record and appealed, including the disciplinary proceeding that would result I manifest injustice against me in term of loss of my 1st Amendment fundamental rights and other claims should the case be affirmed.

The fixed, unfair partial disciplinary proceeding brought in conspiracy by the Delaware Supreme Court, Chancery Court agents, ODC and Board, (collectively, and individually “State”) to conceal Court agents’ unconstitutional interference with the “due process” adjudication of *Kelly v Trump*, and thereby in interference with my personal-religious-political-speech; personal-religious-beliefs; personal-religious-political-exercise; and personal-religious-political-petitions has punished me and violated by constitutional protections by selective disparate treatment against me, for the exercise of fundamental rights, as a party of one, as an indigent individual with religious-political beliefs in God as savior and the state as civil authority curbed by the first amendment from “establishing religion.”

The findings below must be rejected as a matter of law as an abuse of discretion, clearly erroneous findings of fact, an errant conclusion of law, and an improper application of law to facts.

The hearings and actions taken 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*, for petitioning the court regarding bar dues to safeguard my liberties and for petitioning the Court regarding the state’s and its members violations of my Constitutional rights.

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.

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 and for retaliation for the exercise of my fundamental First Amendment right to petition to safeguard my exercise of the First Amendment right to religious belief, contained in my private 1st Amendment exercise of protected private speech contained in my petitions in *Kelly v Trump* and for bar dues..

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 Third Circuit erred as a matter of law in denying my asserted claims that arose since the filing of the petition that I placed on the record, which would cause manifest injustice against me should they not be heard since the statute of limitations approaches and poverty creates a

substantial burden so great as to deprive me of access to the only court which may grant me relief especially since the statute of limitations has expired for some claims and approaches expiration for other claims and my poverty creates a substantial burden to access to the courts should I be compelled to start all over. For example, the petitions relating to bar dues have expired.

The Court overlooked the additional facts I alleged below showing violations of my 1st Amendment religious beliefs, 6th Amendment right to self-represent, 14th Amend. procedural due process violations, violations of Equal Protections, and specific facts showing lack of adequate notice, denial of asserted rights, denial of fair meaningful opportunity to be heard, to call witnesses, to cross examine my suspected accusers, to prevent evidence in my favor, additional conduct causing emotional distress manifesting in the shingles, the state's elimination of evidence in my favor and other voluminous evidence on the record below, including in my motions for a reconsideration. DI-14, DI-20 through DI-24, DI 29, DI-34 through DI-37, DI-39 through DI-44, DI-47 through DI58, and additional docket items after the Order at DI-60. This new and additional evidence contained in DI-14 through DI-58 must not be ignored. It is part of the record on appeal. The Court also erred by ignoring my challenges to state rules. See DI 58, for one example. I met the standard for reconsideration.

The claims I asserted in my Motions of reargument and the orders denying them must in the interest of justice be considered by the Court as not waived but asserted on the record in the trial and appellate court. For example in the First Motion for reargument and the amendments thereto, I discussed the State's violations relating to appointment of counsel on December 13, 2022. I immediately informed the state court I declined representation. I faced foreseeable emotional distress at violating my beliefs in Jesus by such appointment over my objection. Jesus

teaches us to let the holy spirit to be our advocate when we are brought to the courts for our religious beliefs. The fact I fought hard to fire the counsel who was removed less than two weeks before the improperly scheduled hearing date, does not remove the Defendants' and the Delaware Supreme Court's violation of my First Amendment right to religious belief and exercise of belief and Sixth Amendment right to self-representation, to opportunity to call witness and other rights applicable to the state pursuant to the 1st, 6th and 14th Amend.

The US Supreme Court in *Faretta v. California*, 422 U.S. 806, 95 S. Ct. 2525, 45 L. Ed. 2d 562 (1975) held,

“Sixth Amendment does not provide merely that defense shall be made for accused but grants to accused personally the right to make a defense; right to self-representation to make one's own defense personally is necessarily implied by structure of the amendment.” U.S.C.A.Const. Amend.”

In my other motions the Court denied I outlined other Constitutional defects in the Delaware Disciplinary proceeding that in the interest of justice must be considered by this Court in the court's denial of my motion to amend the complaint once as a matter of right.

The Delaware Disciplinary procedure was so lacking in notice or opportunity to be heard before the Delaware original disciplinary proceeding as to constitute a deprivation of due process in the Delaware forum. There was such an infirmity of proof as to give rise to the clear conviction that this court could not, consistent with its duty, accept as final the conclusion by the state court.

The Court refused to give me pleadings in a case against me to conceal the fact it denied me the opportunity to be heard in objecting to the appointment of counsel, Number 541. I am entitled to records used against me as a party in a proceeding. I am entitled to see if my pleadings were on the record or if I was denied an opportunity to be heard in contravention to 1st

and 14th Due Process with disparate treatment based on religious-political belief and poverty. *US Amend I, XIV. See, N. Jersey Media Grp. Inc. v. United States*, 836 F.3d 421, 434 (3d Cir. 2016).

The lawyer Disciplinary proceedings before the Defendants and Delaware Supreme Court deprived me of a meaningful opportunity to be heard, the opportunity to prepare, call witness, receive adequate notice, the right to self-represent, to present evidence without the State forum's collusion to conceal evidence and other vitiations of my asserted, not waived Constitutional protections and rights in the Delaware Disciplinary Proceeding. *Greene v. McElroy*, 360 U.S. 474, 475 (1959) ("this Court will not hold that a person may be deprived of the right to follow his chosen profession without full hearings where accusers may be confronted and cross-examined").

The US Supreme Court further held, "It is accused, not counsel, who must be informed of nature and cause of accusation, who must be confronted with witnesses against him, and who must be accorded compulsory process for obtaining witnesses in his favor. U.S. Const. Amend. 6." *Faretta v. California*, 422 U.S. 806, 95 S. Ct. 2525, 45 L. Ed. 2d 562 (1975). I was denied the right of notice, opportunity to confront and right other rights. The Court erred in ignoring these denials contained in my motions for reargument and other motions below.

The State denied me of the meaningful opportunity to litigate the question of subject-matter jurisdiction in the sham proceeding against me, and thus I may reopen that question in a collateral attack based on adverse judgment. This Court has not allowed me the opportunity to present the facts to show this. I must be afforded notice and the opportunity to be heard under the 5Th Amendment applicable to the federal courts to prevent unconstitutional vitiation of rights by this Court. US Amend I, V.

I incorporate herein by reference in its entirety along with the pleadings referred therein 3DI-98, the memory stick referred to at DI-58, and the District Court items DI-62 to DI-148 since this Court appeared to consider the additional Orders at DI-106, DI-111. The Court errs as a matter of law and as a matter of fact creating manifest injustice against me by ignoring the legal arguments, claims and additional facts on the record below. Id.

The Court errs as a matter of law for not considering my motion to withdraw my motion to amend the complaint at DI 43, my additional motions to amend the complaint once as a matter of right to include all the additional claims, facts, foreseeable harm and additional information discovered and arising in the course of this litigation, including but not limited to items in DI-43, DI-58, DI 69-75, DI-77, DI-81, DI-85-87. DI 95.

The Court abused its discretion in denying me the right to amend the complaint as a matter of right, despite the lower Court not ruling on my motion to amend which I withdrew and reserved the right to amend as a matter of right prior to the Order at DI 60, (DI 58) and more specifically after the order when the case is remanded DI 43, DI 58, DI 69 through 81.

My claims relate not only to my petitions in Kelly v Trump but also First Amendment violations of my right to petition applicable to the state pursuant to the 14th Amendment regarding petitions for bar dues. DI 2-4, 3DI 74. Should this case be dismissed the statute of limitations would foreclose me an opportunity to assert my claims anywhere in the only forum which may offer relief, the District Court. This Court was apprised of the Delaware Supreme Court's collusion in Kelly v Trump and the DE Disciplinary proceeding, and my claims for damages, nominal relief and equitable relief other than enjoining the disciplinary proceeding. DI 43, DI 58, 3DI-6 page 3 through 11, 3DI-26 through 3DI-29, 3DI-31-32, 3DI 36 through 3DI 46, 3DI 51 through 3DI 62, 3DI-68, 3DI-69, 3DI-71-3DI-76, 3DI-83-84, 3DI-93, 3DI-95 through

3DI-99, 3DI-103-107, 3DI-119-3DI-198; See, *Reed v. Goertz*, No. 21-442, at *5 (Apr. 19, 2023)(“*Ex parte Young* doctrine allows suits like Reed’s for declaratory or injunctive relief against state officers in their official capacities.”) *Id* at 6-7 and 24 (*Rocker-Feldman* and 28 USC 1257 do not prohibit violations of procedural due process claims); See, *Centifanti v. Nix*, 865 F.2d 1422, 1430 (3d Cir. 1989).

Further whether *Rooker-Feldman* applies to claims I have not yet made is not ripe on appeal. The District Court did not review the merits of my claims. This appeal is limited to the improvident dismissal under *Younger*, and denial of my asserted right to amend the complaint once as a matter of right. The claims if accepted as pled show independent federal claims I must be allowed to argue before preemptive denial, including but not limited to void or voidable subject matter jurisdiction of the Delaware forum. US Amend V.

I also seek to amend the complaint to include a number of new claims too numerous to outline that I must be afforded the opportunity to be heard on before being preemptively denied in violation of the US Amend V opportunity to be heard, including but not limited to assertions that DE Disciplinary rules are unconstitutional per se and some as applied which are not prohibited by the *Rocker-Feldman* doctrine. See, *Parkview Assoc. Partnership v. City of Lebanon*, 225 F.3d 321, 327-28 (3d Cir. 2000) (Constitutional challenges to rules are not barred bar *Rooker-Feldman*); DI 77-79, DI 58; See, *Skinner v. Switzer*, 562 U.S. 521, 532 (2011)(“If a federal plaintiff ‘present[s][an] independent claim,’” it is not an impediment to the exercise of federal jurisdiction that the ‘same or a related question’ was earlier aired between the parties in state court.” (internal citations omitted)); *Id* at 33 n 10(“The Court further observed in *Exxon Mobil Corp. v. Saudi Basic Industries Corp.*, 544 U.S. 280, 292–293, 125 S.Ct. 1517, 161

L.Ed.2d 454 (2005), that “[w]hen there is parallel state and federal litigation,” state preclusion law may become decisive, but “[p]reclusion ... is not a jurisdictional matter.””).

The Third Circuit and District Court (hereinafter “Courts”) overlooked the fact I invoked my right to amend the complaint once as a matter of right under FRCP 15. Though the Court argues my plea to enjoin the case against me as moot. This is capable of repetition and evading review, and has created manifest injustice against me as well as other lawyers and professionals who have legitimate claims for which they should not be punished for making in violation of the First Amendment right to petition, merely because the claims are against the government or government agents. This disparately favors government agents in violation of the Equal protections Clause in their private and official capacity, making it impossible to correct misconduct by just decrees.

I must be granted leave to amend the complaint as a matter of right under FRCP15 (a), 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. See, *Mayle v. Felix*, 545 U.S. 644, 663 (2005). The Supreme Court in *Foman v. Davis*, 371 U.S. 178, 182 (1962) held the “outright refusal to grant the leave [to amend the complaint] without any justifying reason appearing for the denial is not an exercise of discretion; it is merely abuse of that discretion and inconsistent with the spirit of the Federal Rules.” This Court abuses its discretion by denying my asserted right to amend the complaint. 3DI 98.

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 Appellate Court abused its discretion by ignoring the evidence averred showing bad faith and harassment including but not limited to Court staff prevented service of my pleadings by writing on the praecipe, instructing me to cross off local counsel's address and for misleading me in hopes I miss a deadline to appeal an order I had not yet received. The DE Supreme Court sent Court of Common Pleas Judge Kenneth S. Clark to attack me to compel me to forgo my Kelly v Trump, the court fired witnesses, sealed documents in my favor without providing me notice and an opportunity to be heard to conceal evidence in my favor in both Kelly v Trump, and the Disciplinary proceeding sending additional Delaware Supreme Court arms and agents to cause me to forgo Kelly v Trump, Defendant Swartz lied in an attempt to fix the proceeding and cost me additional money time and resources. Defendants violated not only my Constitutional first Amendment rights to petition, religious belief, speech, association and exercise of belief, the court denied me fair notice by violating its own disciplinary rules, denied me the right to self-represent, a fair opportunity to be heard, the right to call witnesses. DI 2, 3DI 98, Exhibit A-D

I sought claims for emotional distress, violations of procedural due process, Equal Protections claims, First Amendment violations of **private right to petition**, religious belief, exercise of belief, speech and association, loss of employment opportunities, or other economic harm, and harm to my reputation during Kelly v Trump. (DI 2)

New claims arose during the law suit which 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 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 respectfully request this Court vacate the District-Order, and remand the case back to the Delaware District Court for review, granting leave to amend the complaint in the amount of 30 days from the date of the order or longer period to allow me to consult with opposing counsel in good faith since I believe the courts and the government are in peril. I believe the courts are our hope of a hero to prevent or reverse an economic crash, which appears to be designed to eliminate the government down the line. I hope the court may use this case to safeguard the Constitutional limits which preserve these United States from demise.

Court overlooked the fact I have colorable claims against the Delaware Supreme Court and its members in both their professional and personal capacity, under an Ex Parte Young

theory as well as equitable claims for prospective and other relief. In *Ex Parte Young*, 209 U.S. 123, 28 S.Ct. 441, 52 L.Ed. 714 (1908).

Delaware brought a disciplinary case against me to conceal and cover up its violation of federal laws and my Constitutional rights, and to punish me for the exercise of Constitutional rights including but not limited to the First Amendment right to petition the courts for disparate treatment by its own members based on religious-political-or poverty animus and procedural due process violations. DI 2-4 My religious beliefs in Jesus outlined in my petitions are the source of Defendants adjudication of disability. They indicate my religious beliefs confuse Defendants. They cite my belief in the Bible as a source of the disciplinary proceeding at Number 7 of the petition. They cite my protected private speech outlined in my private petitions outlining my private religious beliefs and exercise of religious beliefs in the letter dated August 23, 2023 as the source of concern of disability.

The baseless allegations the panel cites, that I allegedly “lack competence to practice law and endanger prospective clients, the public and the orderly administration of justice” is to cover up my petitions to the courts for the governments’ violation of the Constitution and federal law, including its own violations. The State Court intentionally secretly sealed my petitions in violation of my First Amendment right to petition to conceal material evidence in my favor to cover up its own violations of my procedural and substantive due process rights. This concealment is also a procedural due process violation.

The Court asserts my legitimate arguments are not cogent, in order to cover up its own misconduct, while further covering up State misconduct by adjudicating me disabled. It may not be convenient to uphold justice. It is easier to orderly administer standardized injustice than to uphold the 1st Amendment applicable to the State via the 14th to accommodate individuals whose

religious beliefs or arguments are not standardized to the common norms. Nevertheless, the asserted Constitutional limits supersede eliminating freedom for convenience, productivity and administration of court business. Freedoms are not for sale, or none are free. We are for sale products to bargain favor with foreign and private government partners. My license to practice law was not exchanged for the freedom to belief in Jesus Christ or other Constitutional liberties.

This Appellate Court improvidently cites to the mere allegations that my religious beliefs in the petitions are not clear, unfocused [to the Defendants' aim] and confused the Defendants. My religious beliefs need not be clear, nor do they need to understand them for me to assert my First Amendment right to genuine religious belief without a government incited substantial burden but for the exercise of religious belief and other First Amendment rights. Moreover, they are relevant to this matter, *Kelly v Trump*, and the disciplinary proceedings even if Defendants do not find my religious belief in Jesus Christ not money as savior and God reasonable. *Matthew 6:24*.

This Court improvidently cites the false allegation my pleadings "were non-complaint with the Court rules." There is no rule I violated during *Kelly v Trump*, or the Delaware Disciplinary proceeding since my asserted 1st Amendment invoked rights to religious belief and 5th amendment right against self-incrimination supersede the compelled mental examination despite my invoked objections on Constitutional grounds of religious objection and interference in my access to the courts in the exercise of the 1st Amendment right to petition in *Kelly v Trump* supersede state rules. It is my religious belief the field of mental health, psychology, psychology and behaviorists teach the way to certain damnation in the fires of hell by teaching physical, chemical, environmental conditions also known as temptations may be manipulated to control a person's no longer free will in contravention with the teachings of Jesus Christ.

Moreover, the Defendants were non-compliant with disciplinary rules 9 and 12, preemptive federal law and the preemptive Constitution limits which restrain their conduct within the purview of superseding federal laws.. The allegation my defense of religious beliefs contained in my speech “were confusing and unfocused and irrelevant to the issues at hand” are to cover up the very real issues that were relevant to whether the disability proceeding was brought in retaliation for my exercise of the right to petition the State over the course of about 20 years, and my right to private religious-political belief, private-religious exercise of belief, private right to associate based on religious-political belief without being restrained by a mere license to practice law, and right to equal protections, procedural due process and to be free from collusion to intimidate me to cause me to withdraw my petitions in Kelly v Trump in violation of 1985 and 1988, the First Amendment applicable to the state pursuant to the 14th Amendment, other federal law, and state claims for intentional or reckless infliction of emotional distress, defamation and other claims.

Defendants made a motion by short letter despite my objection to appointed counsel in violation of my First Amendment right to petition. I certainly was permitted to draft a letter, dated December 18, 2022. Albeit, I also drafted motions. DI 1-DI 58.

This Court errs as a matter of law and as a matter of fact by claiming the “Delaware Supreme Court's order adjusting her status, claiming she was denied notice, discovery, an impartial judge, an ability to present evidence and witnesses, and the like are beyond the scope of this appeal.” I asserted these claims in legal and factual arguments below, including in my motions of reargument. They are material to the District Court’s clear error of fact, clear error of law and this appeal to prevent manifest injustice against me, and others by creating case law

which will chill the exercise of professionals' religious beliefs under the threat they may no longer buy and sell and die of want.

This case presents a unique important Constitutional question as to whether a disciplinary proceeding brought to punish petitions against the government, in violation of the US Amend I right to petition, and right to speech on subject matter grounds, or other Constitutional exercise and the Equal Protections Clause is subject to voidability. Defendants seek to discipline Colleague Richard Abbott for petitioning against the County and Courts. Are the courts above the law, or will this Court rule judges may be corrected within the purview of the Constitutional limits 1. Cases and controversies and 2. impeachment, without vindictive retribution for correction.

This case presents a unique important Constitutional question as to whether a disciplinary proceeding brought in violation of the Equal Protections Clause based on disparate treatment with religious-political animus, place of origin animus too since two judges demeaned me by telling me by one Judge Slight telling me to go back to PA and a second Judge Court of Common Pleas Judge Smalls called me a Philadelphia lawyer, and political animus regarding my run for office without violating my religious beliefs by organized fundraising or signatures, and

The Delaware Supreme court may not restrain me in following my chosen professions on the basis of fact determinations concerning their fitness made in proceedings in which I was denied the traditional procedural safeguards of confrontation and cross-examination. See, Amend I, VI, and XIV, regarding procedural due process. *Also See, Greene v. McElroy*, 360 U.S. 474, 492 and 493(1959) ("the right to hold specific private employment and to follow a chosen profession free from unreasonable governmental interference comes within the "liberty" and "property" concepts of the Fifth Amendment," and so by extension the 14th Amendment), *Dent v.*

West Virginia, 129 U.S. 114; *Schware v. Board of Bar Examiners*, 353 U.S. 232; *Peters v. Hobby*, 349 U.S. 331, 352 (concurring opinion); cf. *Slochower v. Board of Education*, 350 U.S. 551; *Truax v. Raich*, 239 U.S. 33, 41; *Allgeyer v. Louisiana*, 165 U.S. 578, 589-590; *Powell v. Pennsylvania*, 127 U.S. 678, 684”). The US Supreme Court extended the 6th Amendment asserted right of confrontation in noncriminal matters. *Mattox v. United States*, 156 U.S. 237, 242-244; *Kirby v. United States*, 174 U.S. 47; *Motes v. United States*, 178 U.S. 458, 474; *In re Oliver*, 333 U.S. 257, 273, *Southern R. Co. v. Virginia*, 290 U.S. 190; *Ohio Bell Telephone Co. v. Public Utilities Commission*, 301 U.S. 292; *Morgan v. United States*, 304 U.S. 1, 19; *Carter v. Kubler*, 320 U.S. 243; *Reilly v. Pinkus*, 338 U.S. 269. Nor, as it has been pointed out, has Congress ignored these fundamental requirements in enacting regulatory legislation. *Joint Anti-Fascist Committee v. McGrath*, 341 U.S. 168-169 (concurring opinion).

The Delaware Disciplinary procedure was so lacking in notice or opportunity to be heard before the Delaware original disciplinary proceeding as to constitute a deprivation of due process in the Delaware form and that there was such an infirmity of proof as to give rise to the clear conviction that this court could not, consistent with its duty, accept as final the conclusion on that subject in that the Delaware Supreme Court covered up material evidence by sealing pleadings to my defense, firing two material witnesses to my defense, denying me the write to subpoena them or to perform discovery,

I was denied the reasonable opportunity under the circumstances to conceal the fact the Delaware Supreme Court fired two witnesses material to my defense. Moreover two members of the Delaware Supreme Court retired from the Delaware bench in hopes to evade service. It is notable I sought to substitute President Biden for President Trump to dissolve his continuation of former President Trump’s misconduct in the establishment of government religion by partnering

with churches in government business, eliminating the freedom by compelled force for me as a party of one.

This Court must hold that judges must uphold and not violate the Constitutional laws that protect claimants including me and Richard Abbott, Esquire without exhibiting partiality and bias towards itself, members and the appearance of the courts' members.

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

C. ARGUMENT

1. 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.

2. 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

The 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 by DI 81, 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 the original complaint I stated:

Per the Complaint I made many claims for relief including for damages and later in my motions to amend the complaint once as a matter of right for additional nominal and equitable relief. For example in the original complaint I pled:

"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.

187. 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.

188. 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

189. 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).

190. 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).

191. 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.);

192. 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).

193. 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.

194. 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.

195. 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.

206. 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.

SPECIFIC DELAWARE GOVERNMENT AGENT RETALIATION

213. 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*.

214. “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)

215. 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.

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

217. 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.

218. 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.

219. 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.

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

221. 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.

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

223. 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”).

224. 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.

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

226. 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.

227. 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").

228. 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.

229. 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.

230. 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.

231. 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.

232. 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.

233. 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*.

234. 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.

235. 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.

236. 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)

237. 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.

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

239. "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, *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").

240. "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."))

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

242. "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)).

243. 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.

244. 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.

245. 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.

246. 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.

247. “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).

248. 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.

249. “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).

250. 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.

251. 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 Court will take each request under consideration as received and act appropriately.” *Citing, the letter contained in US Ex-Ex-A-5.*

252. 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 14th 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

253. 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.

254. 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.

255. 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."

256. 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.

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

258. 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.

259. 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.

260. 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.

261. 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*.

262. 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*.

263. 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.

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

265. 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.”...

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

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

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

271. 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."

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

273. I have the freedom to chase after God's will instead of chasing after money.

274. 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...

305. 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.

306. 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.

307. 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.

308. 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.

309. 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.

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

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

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.”⁴² I made it clear to this Court, I pled defamation, Constitutional injury and

⁴² 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); *f v. Fauver*, 762 F.2d 325 (3d Cir. 1985) (“District court should have retained jurisdiction over correctional

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.

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).

3. 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.⁴³ (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.

⁴³ *Constr. Drilling, Inc. V. Chusid*, No. 03-3786, 2005 WL 1111760, at *3 (3d Cir. May 11, 2005) (The Third Circuit held, “A judgment may also be void if a court “acted in a manner inconsistent with due process of law.”); See Respondent’s Exhibits to the Hearing (“R-Ex”) Exhibits 35, 37 Part 2, 42, R 44

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

There was no opportunity to ask the Delaware Supreme Court to void its own decision in *Kelly v Trump* and the disciplinary matter or to seek equitable relief, money damages or nominal damages against itself and its agents and arms. I seek to sue the Delaware Supreme Court. They cannot decide the case against itself, because they are a defendant. The Delaware Supreme Court is partial to the state and itself. I am entitled to an impartial judge, in accordance with the 1st and 14th Amendment procedural and substantive Due Process protections.⁴⁴

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

⁴⁴ US Const. Amend I, V. (See, *Schweiker v. McClure*, 456 U.S. 188 (1982) reversed on other grounds; *Gibson v. Berryhill*, 411 U.S. 564, 570 (1973); *Ward v Village of Monroeville*, 409 US 57 61-62 (1972) (“Petitioner is entitled to a neutral and detached judge in the first instance.”); *In Re Murchinson*, 349 US 133, 136 (1955); *Tumey v State of Ohio*, 273 US 510 (1927); *Withrow v. Larkin*, 421 U.S. 35, 46 (1975); *McCool v. Gehret*, 657 A.2d 269, 277 and 280 (Del. 1995) (“excluding evidence [in my case emails] of efforts to influence a witness' testimony [to exclude evidence] constitutes reversible error.“Opinion testimony by a judge creates the appearance of partiality on behalf of a litigant, is greatly prejudicial to the adverse party...”); *Inc. v. Lopez*, CIV. No. 14-1223 (PG) (D.P.R. Oct. 27, 2015); *United Church of the Medical Center v. Medical Center Comm'n*, 689 F.2d 693, 701 (7th Cir. 1982); *Utica Packing Co. v. Block*, 781 F.2d 71, 77 (6th Cir. 1986); *Hammond v. Baldwin*, 866 F.2d 172, 177 (6th Cir. 1989).

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

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

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

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

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

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

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

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

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

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

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

5. 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 7th Motion”), wherein, I provided evidence the Delaware Supreme Court sealed my petitions, material to my defense in the disciplinary proceeding, without providing me notice or an opportunity to be heard to prejudice the case against me in the sham disciplinary proceeding. (D.I. 65, D.I. 65-2, D.I. 65-4).*

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

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

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

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

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

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

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

the First Amendment to fix the outcome, not only in the disciplinary proceeding, but also in *Kelly v Trump*.⁴⁵

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* § 2862.⁴⁶ "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.")

⁴⁵ *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)

⁴⁶ *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 valuing 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.

6. 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.⁴⁷

To worsen matters, the Delaware Supreme Court appeared to cause its arms to attack me to get me to forgo my lawsuit. ⁴⁸ 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**

⁴⁷ (Objxn-B-D, K-internal-exhibits-2-7, 27-29, DI 62-72.

⁴⁸ 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.⁴⁹

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

⁴⁹ *Obergefell v. Hodges*, 576 U.S. 644

religious belief.⁵⁰ 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.⁵¹ **(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.⁵² On November 1, 2021 the US Supreme Court denied my writ of certiorari.⁵³

⁵⁰ *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.")

⁵¹ Objxn-K-Internal-Ex-5-7.

⁵² Objxn-H

⁵³ 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.⁵⁴ 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).

⁵⁴ (*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.⁵⁵ The State has a history of ignoring my religious-political petitions, disparately treating me based on religious view point. ⁵⁶

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. ⁵⁷

⁵⁵ . Objxn-Ex B-H2, K

⁵⁶ 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.

⁵⁷ 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.⁵⁸ 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.⁵⁹ 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.*

⁵⁸ *Brady v. Maryland*, 373 U.S. 83, 87 (1963); , 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)

⁵⁹ 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.⁶⁰ 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.

⁶⁰ Objxn-Ex-N. Mark 13:11 “Whenever you are arrested and brought to trial, do not prepare beforehand about what to say. Just say whatever is given you at the time, for it is not you speaking, but the Holy Spirit.”

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

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

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

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

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

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

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

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

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

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

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

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

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

Kathleen's bad faith, or at best ignorant, attacks display her cold heartless indifference towards the substantial burden poverty has placed upon my defense of exercise of fundamental rights in this case.⁶¹ "[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).⁶²

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

⁶¹ *Abdul-Akbar v. McKelvie*, 239 F.3d 307, 317 (3d Cir. 2001)

⁶² *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."⁶³

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

⁶³ *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.⁶⁴ **(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.⁶⁵

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.⁶⁶

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

⁶⁴ DI 62-72

⁶⁵ . Objxn-K-Ex-31 See letters of recommendation on my behalf concerning my reputation.

⁶⁶ 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.⁶⁷

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

⁶⁷ 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.

7. Whether the court deprived me of the 5th Amendment right to a fair proceeding or violated 28 U.S. Code §§ 144 and 455, 29 CFR § 2200.68, or other applicable law by failing to recuse Judge Phipps given Defendants attacks against me are based on my petitions against Trump, Trump twice placed Phipp's on a list of nominees for US Supreme Court, and Trump will likely nominate Phipps' as Supreme Court justice should he be reelected and an opening occur considering the facts under objective standards, the probability of actual bias on the part of the Judge Phipps against me and in favor of Trump and my opponents is too high to be constitutionally tolerable

The Court committed reversible error by failing to recuse Judge Phipps and appointing another judge in his place.

Judge Phipps' conflict is so great a reasonable person would conclude bias or prejudice in my case under the facts so as to deprive me of a fair proceeding under the 5th Amendment.

Judge Phipps was placed on a list of potential nominees to the US Supreme Court by President Trump. Donald J. Trump ("Trump") is running to become President of the United States in 2024. I believe Trump will likely be reelected. Trump will likely nominate Judge Phipps again should a Supreme Court Justice retire.

The Delaware Office of Disciplinary Counsel state they brought the Disciplinary proceeding against me for suing President Trump. The Delaware Supreme Court cite my

religious beliefs contained in my Religious Freedom Restoration Act petition against President Trump for the reason for the discipline.

I seek to overturn Kelly v Trump in this civil rights case as void due to violations of procedural due process. In addition, this case is based on my lawsuit against the one who may benefit Judge Phipps, Trump, should Phipps rule against me and essentially for Trump, by demeaning my law suit against Trump.

Phipps has a personal stake in my law suit. He has an interest in safeguarding Trump in order to gain a potential seat at the US Supreme Court.

This temptation to gain the most powerful seat on the planet, a position at the US Supreme Court is so great as to create a reasonable person to include there is an appearance of bias or there is actual bias against me in this case and in favor of the Government.

Judge Phipps also has other conflicts of interest I incorporate herein by reference 3DI 142-143-144 and the video where I was on tv, with regards to the law school I attended Duquesne where Phipps taught as an adjunct, and attachments thereto showing conflicts of interests.

Judge Phipps may also be offended by my religious belief that Trump misleads people to hell. Judge Phipps may also be offended I drafted 5 proposals to impeach President Trump 1. Based on his violations of criminal law 18 USC 227 for encouraging the firing of NFL players for peacefully exercising their First Amendment right to petition against alleged disparate treatment against blacks within the criminal judicial system, 2. Violations of 18 USC 227 for encouraging economic harm to members of the press exercising their First Amendment Freedom, 3. An impeachment regarding the porn star activity by the President, 4 relating to kidnapping

babies at the border, and profiting private partners by overcharging payments to their commitment facilities, 5. A proposal relating to the war powers act, I incorporate herein.

No one is above the law or protection, even a peon like me, nor is anyone below the law's correction with mercy, not even the President or judges.

8. The court deprived me of the 5th Amendment right to a fair proceeding or violated 28 U.S. Code §§ 144 and 455, 29 CFR § 2200.68, or other applicable law by failing to recuse Judge Scirica given the conflict of interest Judge Scirica chairs the Committee on Judicial Conduct and Disability ("Judicial rules"). (DI 149). I made Constitutional arguments against the judicial rules, against regulating the US Supreme Court by a Code of Conduct, self-discipline or disciplinary rules, and made arguments against the State disciplinary rules and proceedings that mirror the rules Judge Scirica is charged to revise and approve

The Court committed reversible error in denying my 5th Amendment right to a fair trial to defend the exercise of my 1st Amendment rights of petitioning, speech, religious belief, exercise, and association, 28 U.S. Code §§ 144 and 455, 29 CFR § 2200.68 by denying my Motion to recuse Judge Scirica and a Motion for a rehearing for a different impartial panel or an en banc panel to recuse Judge Scirica.

Judge Scirica is the Chair on the rules of federal judicial discipline I seek to eliminate. He has a personal interest in ruling against me as I seek to overturn his hard work.

I also seek to amend my complaint to include Constitutional arguments against the DE disciplinary proceedings and certain Delaware Disciplinary rules. These rules mirror the rules Judge Scirica works on, and attacks his work. I seek to destroy the work of Jude Scirica in this Civil rights case.

In this Civil rights case, I alerted the Court of my concerns against Judicial discipline and the elimination of people judges. I truly believe preventing the regulation of the US Supreme Court and eliminating the corrupt disciplinary rules against federal judges and requiring life term appointments for all federal judges, with the ability to choose different appointments would aid

in preventing the schemed overthrow of the rule of law to eliminate it by automation by those who reign over people by the mark of the beast, business greed, with no unconditional love

I declared my belief regulating the Court violates the constitutional rights of citizens the court serves, including me as a party of one, and allows for the schemed overthrow to occur in the DE District Court prior to discovering the conflict between Judge Scirica and I. Regulating the Court through disciplinary rules guarantees the partiality of the Court to the interests of those who discipline them instead of the impartial application of the rule of law. (For example see DI 23, not attached), concerning my belief only the courts may prevent an economic crash and an overthrow of our government, DI-53,-55,56, 78, 95, 102, 104, 114, 127, 129, 131, 149-162, not attached). Favoritism towards those who serve the alleged professions' collective convenience, productivity or the individual judge's future or current seat or highly esteemed position creates unfair proceedings when conflicts arise. I seek to declare the disciplinary rules Judge Scirica drafts are unlawful by amending my complaint in the civil rights proceeding to make that argument . I included certain arguments against certain DE Attorney Disciplinary rules and the Attorney Disciplinary proceedings I incorporate herein by reference but reserve my right to include more arguments in this Civil rights proceeding should it be remanded. Judge Scirica denied me the opportunity to be heard on my arguments, by denying my right to amend to contest certain state rules. Attached hereto please find my Motion for ECF rights in the District Court below, which I incorporate herein by reference in its entirety, wherein I contested an additional, different Delaware Disciplinary rule I wish to include in a complaint Del. Law. R. of Disciplinary Proc. Rule 7(d).

The fact I argued on the record in this civil rights case my desire to eliminate or prevent disciplinary rules of federal judges and the United States Supreme Court creates a conflict of

interest with Judge Scirica so great as to deprive me of a fair proceeding. Even the appearance of a conflict requires a recusal and a new panel who is not swayed by Judge's brilliant mind and perceived expertise in a subject I disagree.

This conflict of interest between Judge Scirica and I relates to whether attorney disciplinary proceedings and certain rules and judicial discipline violate the Constitution by requiring officers of the court to defer towards business interests of the courts, attorneys or the professionals who are charged with discipline, even peers, at the threat of personal punishment instead of the Constitutional application to the rule of law in violation of the supremacy clause.

Lawyers and judges are tempted to adhere to the lesser regulatory laws to protect themselves instead of the Constitutional application of the rule of law to uphold the rights of those they serve, the parties, their clients, the public and their private exercise of fundamental right to religious belief in violation of the Equal Protections Clause of the 5th applicable to the Federal government and the 14th to States by disparately treating claimants whose beliefs conflict with the Disciplinary regulations' purpose.

Judge Scirica has a conflict of interest with my case I was not aware of until recently. Judge Scirica chairs the Committee on Judicial Conduct and Disability. (DI 149.)

I contest the federal judicial disciplinary rules Judge Scirica drafts on Constitutional grounds. I oppose the elimination of life time limits on US Supreme Court justices and believe district court and Circuit Court judges should have life time appointments to prevent them from the temptation to normalize injustice by partiality to the Disciplinary rules as opposed to the preempting Constitutional application of the law, on religious grounds as a party of one with religious beliefs in God's command against favoritism and for justice in the courts.

I seek to destroy what Judge Scirica works on the disciplinary rules as chains that eliminate freedom under the illusion of upholding it by beholding judges to serve what I believe is the mark of lawlessness that misleads humanity to hell, business greed at the cost of human sacrifice of life or liberty.

I strongly oppose regulating the courts to partiality to business by barter or exchange. This urges the courts to serve greed not humanity or the liberty that allows beautiful disorder and criticism which helps us improve and gain humility needed to escape the certain default for most of humanity loss of eternal life due to pride.

I noted on the Delaware record my desire to prevent regulation of the USSC and my hope I could eliminate judicial discipline of federal judges.

I seek to amend my complaint in the civil rights case to include Constitutional arguments against the state disciplinary rules and proceedings against attorneys. I incorporate some not all of my proposed arguments against rules I proposed to the Delaware District Court at DI 58, and two state motions, incorporated herein at 3DI-43-8, 3DI-43-9, 3DI 43-10.

I oppose attorney self-regulation and third party professional regulation through professional boards on Constitutional grounds, on 1st Amendment religious grounds, on grounds the rules violate the Constitutions' 5th and 14th Amendment right of Equal Protections and procedural due process.

Standardized compelled practice eliminates free will needed to protect Constitutional freedoms of clients and professionals who do not conform to the standards. Standards makes professional practices above the law by deference of the courts to the standards even when such

standards harm, oppress, kill, steal and destroy human life and health for the bottom line. The standards create partiality to profit, productivity not justice.

The conflict of interest between Judge Scirica's interest in carefully drafting federal disciplinary laws that mimic the disciplinary laws and disciplinary proceedings I seek to declare unconstitutional in the civil rights case, and in this case is prejudicial as a matter of fact, a matter of law as to create manifest injustice against me should the Order not be overturned.

"The Fourteenth Amendment's due process clause may sometimes demand recusal even when a judge has no actual bias." *Citing, Rippo v. Baker*, 580 U.S. 285, 137 S. Ct. 905, 197 L. Ed. 2d 167 (2017).

Recusal is required under the Fourteenth Amendment's due process clause because "objectively speaking, the probability of actual bias on the part of the judge or decisionmaker is too high to be constitutionally tolerable.' *Id.* In my case the probability that Judge Scirica would deny me the mere opportunity to be heard to contest the disciplinary rules he works on, or mirror the rules he works on, is too great as to cause actual in addition to apparent partiality to my claims and future claims, and past claims in other cases.

It is especially notable as two forums, the USSC and the DC ODC appeared to accept my argument the reporting requirements violate the 5th Amendment right against self-incrimination.

It was clear error of law for Judge Scirica and Judge Phipps to fail to disqualify themselves in this proceeding. A reasonable person would question the partiality of both Judge Scirica and Judge Phipps under the facts of this case. "[A} reasonable person, knowing the relevant facts, would expect that the [Judge Scirica and Judge Phipps knew of circumstances creating an appearance of partiality, notwithstanding finding that the judge was not actually

conscious of those circumstances. 28 U.S.C.A. § 455(a). *Liljeberg v. Health Servs. Acquisition Corp.*, 486 U.S. 847, 108 S. Ct. 2194, 100 L. Ed. 2d 855 (1988)

“The operative inquiry is objective: whether, ‘Considering all the circumstances alleged,’ *Rippo*, at 907, ‘the average judge in [the same] position is likely to be neutral, or whether there is an unconstitutional potential for bias,’” *Citing, Isom v. Arkansas*, 205 L. Ed. 2d 373, 140 S. Ct. 342, 343–44 (2019) *Citing, Williams v. Pennsylvania*, 579 U.S. 1 (2016).

Considering all of the circumstances a reasonable person would find no judge in the position of Judge Scirica could ignore the potential unconstitutional bias based on the fact I am attacking his personal, hard work regardless of the fact he may not have a pecuniary stake other than the esteemed position of drafting the rules that regulate his peers which I seek to argue are unconstitutional in another case and potentially this case to prevent standardization of the court to an extent to allow the automation of the Court like certain courts in China have become peopleless, per the attached article without an exhibit page.⁶⁸ Those whose exercise of individual not collective liberties which do not fall within the purview of the standards through

⁶⁸ *Isom v. Arkansas*, 205 L. Ed. 2d 373, 140 S. Ct. 342, 344 (2019) (At the same time, the Court has acknowledged that “[a]llowing a decisionmaker to review and evaluate his own prior decisions raises problems,” *Withrow*, 421 U.S. at 58, n. 25, 95 S.Ct. 1456, perhaps because of the risk that a judge might “ ‘be so psychologically wedded to his or her previous position’ ” that he or she will “ ‘consciously or unconsciously avoid the appearance of having erred or changed position.’ ” *Williams*, 579 U. S., at —, 136 S.Ct., at 1906 (*quoting Withrow*, 421 U.S. at 57, 95 S.Ct. 1456). And it has warned that a judge’s “personal knowledge and impression” of a case may sometimes outweigh the parties’ arguments. *In re Murchison*, 349 U.S. 133, 138, 75 S.Ct. 623, 99 L.Ed. 942 (1955).)

Liteky v. United States, 510 U.S. 540, 114 S. Ct. 1147, 127 L. Ed. 2d 474 (1994)(“Extrajudicial source is not the only basis for establishing disqualifying bias or prejudice; it is the only common basis, but it is not the exclusive one, since it is not the exclusive reason a predisposition can be wrongful or inappropriate. 28 U.S.C.A. §§ 144, 455”)

automation in the peopless courts in China are not free, but compelled to mob rule for the convenience of court business.

In *Laird v. Tatum*, 409 U.S. 824, 93 S. Ct. 7, 34 L. Ed. 2d 50 (1972), Justice Rehnquist held that “Supreme Court justice has a duty to sit where not disqualified which is equally as strong as the duty to not sit where disqualified. (Per Mr. Justice Rehnquist, on motion to recuse.) 28 U.S.C.A. §§ 453, 455.

The US Supreme Court held in *Williams v. Pennsylvania*, 579 U.S. 1, 14, 136 S. Ct. 1899, 1909, 195 L. Ed. 2d 132 (2016):

“Having determined that Chief Justice Castille's participation violated due process, the Court must resolve whether Williams is entitled to relief. In past cases, the Court has not had to decide the question whether a due process violation arising from a jurist's failure to recuse amounts to harmless error if the jurist is on a multimember court and the jurist's vote was not decisive. See *Lavoie*, supra, at 827–828, 106 S.Ct. 1580 (addressing “the question whether a decision of a multimember tribunal must be vacated because of the participation of one member who had an interest in the outcome of the case,” where that member's vote was outcome determinative). For the reasons discussed below, the Court holds that an unconstitutional failure to recuse constitutes structural error even if the judge in question did not cast a deciding vote.”

Accordingly participation and recusal of Judge Scirica in this civil rights case even if he was not the deciding vote is required as a matter of law, as a matter of fact creating manifest injustice against me by vitiating my fundamental rights including the First Amendment right to petition the courts to demand the courts uphold my fundamental rights instead of exhibiting unlawful partiality and deference to sister courts in violation of the 5th Amendment Equal Protections components by courts protecting their own interest and not the Constitutional preempting liberties of the people they swore an oath to serve. I argue the courts must not punish lawyers for petitioning to safeguard Constitutional laws that protect claimants and their own private acts, but must allow it to protect the impartial rule of law, prevent regulation and preserve these United States from schemed overthrow.

Judge Scirica and Judge Phipps abused their discretion by not recusing themselves committing clear error of law, error of fact, creating manifest injustice against me.

This law suit arises based on my private exercise of the 1st Amendment right to petition in a law suit against former President Donald J. Trump (“Trump”) to dissolve the establishment of government religion that created and continues to create a substantial burden upon my religious exercise. I incorporate herein by reference the pleadings I filed in *Kelly v. Trump* at DI 4. I am a Christian, who associates as a Catholic who places her faith in God, not the church or priest as God. See, 1 *Corinthians* 2:5, *Matthew* 23:8, *John* 14:1.

The State of Delaware admitted it placed my license to practice law on inactive disabled but for my private-exercise of the First Amendment rights to petition in *Kelly v Trump*, exercise religious belief, exercise of belief, association, my private First Amendment right of protected speech to outline my genuinely held religious beliefs in *Kelly v Trump*. See, DE Disciplinary petition at 7 at 3DI21-6, August 23, 2021 letter 3DI21-7. Though evidence shows they also colluded based on my private exercise of the right to petition concerning bar dues, and private right to petition both the Chancery Court and Delaware Supreme Court concerning procedural due process defects caused by its own members and agents. Id. See, A-4, *Appellant’s Motion for the Delaware Supreme Court to rein in its arms through its agents from unlawfully pressuring appellant to forgo or impede her case to protect her free exercise of religion by relief it deems just, and exhibits thereto*, Exhibit 55 of the brief below, the December 1, 2020 letter regarding due process concerns to the Master, and the October 19, 2020 letter to the Master regarding the fact I am pro se, not represented by counsel, and, A-5. *Appellant’s Motion for the Delaware Supreme Court to require the recusal of the honorable Chief Justice Collins J. Seitz, Junior in this matter, exhibits thereto, proof of payment of bar dues, emails to Mark Vavala confirming he*

did not incite the investigation, Letter from the Court in response to my request for exemption of bar dues for all attorneys facing hardship, Feb. 5, 2021 request for relief from bar dues, my concerns relating to recent US Supreme Court cases. Citing, (Apps. 1-B, 1-C, 1-D)

“[Judge Phipps and Judge Scirica’s] unconstitutional failure to recuse, in violation of due process, constitutes structural error not subject to harmless-error review, even if the judge in question did not cast a deciding vote on a multimember court.” *Williams v. Pennsylvania*, 579 U.S. 1, 136 S. Ct. 1899, 195 L. Ed. 2d 132 (2016). However Judge Phipps appeared to so participate making the violation even more grave.

“A multimember court must not have its guarantee of neutrality undermined, for the appearance of bias demeans the reputation and integrity not just of one jurist, but of the larger institution of which he or she is a part.” *Id.*

Under objective standards in my case, “ the probability of actual bias on the part of the [Judge Phipps and Judge Scirica] is too high to be constitutionally tolerable.” (*Rippo v. Baker*, 137 S. Ct. 905, 907 (2017), Citing *Withrow v. Larkin*, [421 U.S. 35, 47](#), [95 S.Ct. 1456](#), [43 L.Ed.2d 712](#) (1975); *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868, 872 (2009)). “The *Tumey* Court concluded that the Due Process Clause incorporated the common-law rule that a judge must recuse himself when he has “a direct, personal, substantial, pecuniary interest” in a case. *Ibi*” *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868, 876 (2009). In this matter, Judge Scirica;s personal interest in opposition to my claims is too prejudicial to my case to afford me a fair proceeding. US Amend I, V.

““A fair trial in a fair tribunal is a basic requirement of due process.” *Murchison, supra*, at 136, [75 S.Ct. 623](#)” *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868, 876

(2009). The Court cannot grant a fair proceeding with Judge Scirica's participation, and this Court violated due process by allowing Judge Phipps participation in the June 30, 2023 Orders.

"The Court asks not whether a judge harbors an actual, subjective bias, but instead whether, as an objective matter, the average judge in his position is likely to be neutral, or whether there is an unconstitutional potential for bias" *Williams v. Pennsylvania*, 579 U.S. —, —, 136 S.Ct. 1899, 1905, 195 L.Ed.2d 132 (2016) (" (internal quotation marks omitted))."); See, *Rippo v. Baker*, 137 S. Ct. 905, 907 (2017) ("we did not hold that a litigant must show as a matter of course that a judge was "actually biased in [the litigant's] case")

Justice Phipp's actual participation and Judge Scirica's involvement violated due process.

The "Federal Rules of Civil Procedure treat orders that are entered without due process as void, permitting reopening of the case. U.S.C.A. Const.Amend. 5; *Fed.Rules Civ.Proc.Rule* 60(b)(4). The panel's inclusion of Judge Phipps and Judge Scirica violates Due process. US Amend I, V.

9. The US Supreme Court errs as a matter of law by recognizing the deception of appearance of justice instead of actual justice as an important state objection somehow more important than the Constitutional application of the impartial rule of law by the wicked partial selfish interest of the state's own appearance, and if so whether this is not a legitimate reason for part of the statute or regulations of the judiciary under 28 U.S. Code §§ 144 and 455, 29 CFR § 2200.68, or otherwise. Since allowing partiality towards the state's appearance in light of fickle fads and popularity by the mob more than truth and justice creates a biased partial unfair forum in violation of the 5th Amendment procedural due process safeguards and equal protections component

The US Supreme Court appears to enslave the courts to the fickle fads of the public in *Williams-Yulee v. Fla. Bar*, 575 U.S. 433, (2015) decision instead of the impartial Constitutional application to the rule of law by holding, "States have a vital interest in safeguarding public confidence in the fairness and integrity of elected judges; the judiciary's authority depends in large measure on the public's willingness to respect and follow its decisions." This finding

creates injustice by legitimizing an illegitimate purpose by finding courts must appease dictates of the mob or the majority at the sacrifice of every individual liberty upon approval of the collective authority of public perceived opinions. Justice is not a matter of popularity. Justice is a matter of truth, leaving leeway for appeal should judges get it wrong. The USSC errs in *Williams v. Pennsylvania*, 579 U.S. 1, (2016) by thinking, “Both the appearance and reality of impartial justice are necessary to the public legitimacy of judicial pronouncements and thus to the rule of law itself.”

As citizens we are required to uphold the Constitutional positions of congress, the courts and Congress, even if the public disagrees. It is not for the public to decide based on mere appearance. As a Christian I believe Jesus Christ’s command not to judge based on appearance but rightly based on truth in *John 7:24*. I believe Jesus is God and Jesus is correct. The Courts err. Upholding justice is often not popular but is the sworn duty of the Court. The potential for actual injustice and the appearance of injustice must be to protect actual parties, not the fancies of the public or the alleged legitimacy of the courts, and certainly not the rule of law as this promotes sin, aka lawless lusts, to serve partial favor of the courts at the cost of sacrificing the people and their liberty they are charged to protect. 28 U.S.C.A. § 453

There is no social contract by citizens with the government. There is no meeting of the minds. There is a contract with every government employee to accept reduced Constitutional rights in order to uphold the liberties of those they serve, even those the government disagrees with. *Id.* Justice is never a matter of popular opinion. Injustice occurred when Jesus Christ an innocent man, God himself died on the cross because Pilate allowed the mob to reign instead of the impartial rule of law. (*John 19:4-6*) Not all laws nor all sins lead to eternal death. Jesus indicated those who handed him over committed a greater sin. (*John 19:11*) I commit a sin if I

do not correct the court to prevent the believed overthrow of the judiciary. I believe the US Supreme Court gives Congress case law to be used to impeach judges to actually cause public disrepute of judges for doing what they are supposed to do upholding everyone's constitutional rights, even those whose exercise of rights they disagree with. I have a duty to protect judges from harmful choices that may remove them from their seats based on fancies not truth but partiality towards fickle public opinion based on mere appearance.

I was really upset after I read the judicial nominee questions Judge Phipps responded to because he alleged a duty to mere men's precedent as if they were mini-gods not the Constitutional rule of law. I read a recent decision where USSC told lower courts it must obey it. So, I am realizing judges are stuck. Only lawyers have the power to tell judges they are wrong or upper Courts are wrong as advocates. Lawyers must be permitted to do so, even if the lawyer errs, to prevent actual injustices the courts may not consider without the aid of an attorney advocate. With that said, I am concerned about judges lobbying while acting as attorney advocates on behalf of case law they favor by teaching in schools and speaking at special interest groups where not all of the population agrees with judicial partial views by a judge or special interest groups. Ultimately, I think it is up to lawyers to advocate for justice, even if the courts disagree with them. Allowing regulation or discipline of federal judges creates injustice and should be stopped, while disagreement by attorney advocates should be permitted. Judges must not act as attorneys to grant themselves favor at the cost of prejudicing the public and lawyers in their private or professional capacity.

I am troubled by 28 U.S. Code § 455 (a) which provides:

“(a) Any justice, judge, or magistrate judge of the United States shall disqualify himself in any proceeding in which his impartiality might reasonably be questioned” shall be recused.

This section should be unconstitutional since it requires judges recuse by mere appearance, not actual conflicts of interests. I believe lawyers and parties sometimes lie or create the mere illusion and appearance of a conflict to fix the proceeding by blackballing judges who may rule against them. In the times of hacking data, judges may be set up too. I believe congress may use the deception of misconduct or a planted conflict to impeach justices set up to fall so they can win by cheating by clients conniving enough to create the mere illusion of impropriety which is not fair.

This Court is not God, and it gets the law sometimes. There is no improvement and no justice if lawyers are disciplined for upholding justice by correcting the court when they genuinely believe they are wrong or in danger. There are lobbyists who have been talking about eliminating people judges since 2018 when I ran for office because non-lawyers practiced law without licenses. I believe you are in danger. I believe if this Court remanded the case and I am granted permission to ask the District Court to prevent the danger by argue against regulating this Supreme Court and the lower federal courts, this Court may stifle schemes to not only sustain its seats but to prevent an overthrow of the government sometime after 2050.

VI. 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.

The proceeding involves questions of exceptional importance which to my knowledge have not previously been addressed by any Court. The answers the Court provides may promote

the impartiality of the federal courts and preserve the United States from an unnaturally schemed overthrow. The answers may also preserve not only my Constitutional liberties but the Constitutional liberties of the people from the government backed foreign and private partners elimination of all Constitutional protections under the threat of removing the ability of people to buy and sell but for their exercise of religious belief in Jesus's teachings which do not conform to the secular or religious belief of the government, or the government backed foreign or private partners.

The proceeding also involves the important question as to whether anyone with a license to practice law has any First Amendment private freedoms to 1) petition, 2) religious belief, 3) association as a Christian, Catholic, Democrat without removal of the association as a lawyer but for the exercise of the right to petition to safeguard religious beliefs contained in private speech the government finds repugnant, or speech to petition to correct government misconduct or mistakes without retaliation but for the exercise of the 1st Amendment right to petition or 1st Amendment right of private speech contained in petitions relating to grievances caused by government misconduct and mistakes based on subject matter, making the government above the law and lawyers below the law 4) Private speech outlining my religious beliefs in Jesus as God not money or mammon or professional collective gain as God which is the mark of lawlessness leading to damnation in hell, 5) and other private claims and rights from government infringements and violations, including, but not limited to, Equal Protections under the 5th and 14th, 6th Amendment right to self-represent, claims for a fair trial, claims for a right to pleadings in a case against me in Delaware Case Number 541, claims relating to a conspiracy under 1985 to cause me to forgo Kelly v Trump by Delaware supreme Court incited witnesses intimidation and threats, concealing evidence by sealing evidence in my favor to cover up procedural due

process and misconduct by the state court, preventing my ability to call witnesses by ignoring my motions where I asserted the right to self-represent, to perform discovery, by scheduling the hearing within fewer days required to subpoena witnesses 8 days as opposed to 10, required by the state disciplinary rules and other harm such as firing two court staff to conceal evidence necessary to my defense, the reciprocal proceedings and this case, and other claims.

This case relates to the important question as to whether judges are above the Constitutional application of the rule of law and whether a lawyers in exchange for their license to buy and sell as an attorneys are fictitiously deemed, despite no meeting of the minds, below the Constitutional application of the rule of law in exercising their private fundamental rights to petition, speak, believe, self-represent, associate, exercise of religious belief.

This case relates to the important question as to whether lawyers are below the Constitutional protections, and are in fact punished for upholding the Constitution by seeking to correct judicial misconduct and judicial mistakes to protect private rights, the public and the actual impartial rule of law.

This case relates to the important question as to whether federal judges should be corrected within the purview of the Constitutional limits without government compelled waiver of their 5th Amendment right in 1. Cases and controversies and 2. By impeachment, so as not to vitiate the 5th Amendment Equal Protections and right to a fair and impartial forum disciplinary proceedings or regulations of claimants would cause some claimants before the partial forums to suffer. This requires the court entertain and encourage and not chill attorney complaints to correct mistakes and misconduct by the judiciary.

Federal Judges affirmed they would “administer justice without respect to persons, and do equal right to the poor and to the rich,” even people whose religious-political beliefs judges

disagree with, find repugnant or illogical, including me in my private capacity, regardless of my license to practice law. 28 U.S.C.A. § 453

These are important questions to consider that warrants this Court's consideration, even if after remand to the DE District Court where the parties may analyze the important questions including whether the US Supreme Court should self-regulate or adopt a code of ethics in an actual case or controversy.

Dated: October 17, 2023

Respectfully submitted,
/s/Meghan Kelly
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US Bar 283696

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

Dated:

Oct 17, 2023

Meghan Kelly (printed)

Meghan Kelly (signed)

J IFP

No. _____
Application No. 23A144

IN THE SUPREME COURT OF THE UNITED STATES

Meghan M. Kelly, Petitioner

v.

United States District Court, Eastern District of Pennsylvania

**On Petition of Writ of Certiorari to the United States Court of Appeals for the Third
Circuit, Case Number 22-3372**

Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
Pro Se, not represented by
Counsel, Defending my private religious
belief in Jesus as God not money as God
Matthew 6:24
US Bar 283696
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Dated: December 26, 2023

QUESTIONS PRESENTED

I. Whether the Order below must be vacated due to clear error of fact, of law, creating manifest injustice given: The Eastern District Court abused its discretion based on a misunderstanding. The disbarment was not freely and voluntarily rendered. I was subjected to coercion and duress and I was not fully aware of the implications of submitting a letter regarding retirement. I was confused as to whether I was retired and the Court booby trapped me based on my known confusion, in addition to and in the alternative of

Whether the Order below must be vacated as depriving me of 5th Amendment Due Process before District-Court where I requested clarification of notice as to the subject matter of a hearing order date given:

1. I reserved the right to call witnesses of which I was deprived in the original forum,
2. I had numerous outstanding motions with Judge Diamond, including but not limited to a motion to correct the flawed record where the staff misfiled about 20 years' worth of evidence of State of Delaware and Delaware Courts depriving me of asserted fundamental rights outlined in part in 3DI-56 attached hereto, especially the 1st Amendment right to petition and right to religious belief applicable to the state via the 14th Amendment, was misfiled on the docket, two motions were filed as exhibits and another pro se's medical records
3. the District-Court denied me of clarification as to Notice as to what the substance of the hearing given there was multiple outstanding motions I required orders on to defend and not waive my fundamental rights,
4. The Court knew I believed I was retired before its Court

5. Instead of fixing the fatally flawed record below with 1000s of pages disheveled which deprived me of a full, fair and public record in contravention of my asserted 1st, 5th and 6th Amendment rights as a criminally like accused party, the Court entrapped me knowing I believed I was retired, cared about the two fired court staff I sought to call as witnesses, was under great duress due to poverty, lack of access to legal research, transportation and health causing me to collapse due to severe deadly dehydration relating to our bad healthcare wherein I asserted my right to tend to my health as a religious exercise to live and not die for the convenience, material gain or other vanity of men in place of God, and I was in fear of being deprived of access to other courts, causing irreparable injury in terms of loss of fundamental rights, including but not limited to 1st Amendment rights to petition, religious belief, exercise of belief, association, speech, 6th Amendment rights to call witnesses necessary to my defense, 6th Amendment right to self-represent or to choose the counsel of my choice Richard Abbott should he consider though he is free to say no to the terms per 13th Amendment, 13 Amendment right against involuntary servitude, 5th and 14th Amendment rights to a fair proceeding, notice, fair opportunity to be heard, equal protections, due process and other claims.
6. The Court knew my retirement from the PA bar in 2018 did not cause me to lose my active license to practice law before its own court, wherein I did not know.
7. The Court knew I thought I was retired before its court too by the 2018 act of retiring from PA, and

8. The Court requested I draft a memorandum on why my 2018 retirement in PA would still allow me to be barred before the court to get out of doing work to correct the docket in my case or review the outstanding other motions, to allow me to call witnesses and to deal with the complicated issues in my case, while not clarifying my request as to notice of the hearing by cancelling the hearing and rendering a more draconian order by entrapment I did not freely or voluntarily agree to;
9. Requiring the Order be vacated.

II. Whether Meghan Kelly (“Kelly”) has standing to ask the US Supreme Court to prevent regulations or disciplinary rules binding the US Supreme Court and its members 1) to prevent the elimination of the impartial rule of law by the elimination of the independence federal judges require 2), to uphold the 5th Amendment Equal protections component as applied to Kelly as a party of one with her unique religious beliefs or exercise of religious beliefs against partiality in the courts and justice as a command by God in *Amos* 5:15, 3), to prevent compelled violations of her religious beliefs and 4) given the unique facts of this case, including but not limited to evidence Kelly provided plans to use standardization and regulations to eliminate people judges and people staff (as outlined in her Motion for additional time and record below in this case and her civil rights case) to eliminate the rule of law that restrains businesses from enslaving, oppressing, killing, stealing or destroying human life, liberty or health unrestrained by love written in the hearts of men or the just rule of law.

III. Should the Court deny Kelly First-party standing, whether Kelly has Third Party standing based on her special or close relationship with the right holder(s) the US Supreme court members and Federal courts to prevent regulations or elimination of life time appointments

during good behavior given she is an active member of the US Supreme Court whose religious exercise of beliefs includes upholding the impartiality of the courts, she made arguments against regulating the US Supreme Court in this case and the right holder the members of the US Supreme Court or federal courts face obstacles to suing on their own behalf because they may not be the judge in their own case, but may consider the Constitutional rights violated by Congressional or self-regulation of its members or the federal judiciary not limited to such regulations creating courts that violate the 5th Amendment Equal Protections clause against partiality towards Kelly and other claimants by such regulations making the courts partial to the rules that control their judicial positions as opposed to the Constitutional application of the rule of law which protects Kelly's and other claimants Constitutional rights and claims.

IV. Whether Congress or third parties may commandeer the court to draft disciplinary rules or obey rules in violation of their 5th Amendment right against self-incrimination by required incrimination through regulations that impede the federal judiciary's impartial application of the rule of law violating the separations of power, making the federal judiciary branch incapable of placing checks on the other two branches without the fear of reprisal or removal.

V. Whether Congressional commandeering of the US Supreme Court to consent to incriminating rules by forced waiver of the 5th amendment right against self-incrimination violates the 13th Amendment against involuntary bondage to regulators by commandeering the court to the dictates of the regulators or forcing them to draft rules that will be used to incriminate judges in compelled violation of the 5th Amendment right against self-incrimination by government compelled forced not free choice.

VI. Whether regulations and disciplinary rules standardizing the Federal courts or the practice of law impede and infringe upon Kelly's First Amendment exercise of religious belief, exercise of religious belief, association, speech, and petition in defense of Constitutional rights and other claimants whose exercise of fundamental rights do not conform to the standards.

VII. Whether we need people judges to uphold Kelly's exercise of First Amendment rights including but not limited to religious beliefs which do not conform to the majority or the standardized exercise of fundamental rights or whether automation or allowing nonjudges such as out of state title companies, banks, charities, churches, not for profits or businesses to be the judge of her and the people suffices.

VIII. Can the Courts prevent nonlawyers from practicing law and non-judges from judging without government authority given no State or Federal Courts attorney disciplinary rules allow the US Attorney General, the State Attorney General or the Office of Disciplinary Counsel to prevent non lawyers and nonjudges from allowing entities or automation to replace licensed attorneys or sworn in judges, given Kelly ran for office because title Companies practiced law without a license, messed up on the chain of title, and took advantage of her deceased colleague Dick Goll, and it appears to continue and will get worse as Kelly believes real estate chain of title will assist in an agenda to allow private entities to recoup resources to control the people and the government to eliminate the government if left unstopped by the courts.

IX Whether we need unregulated people judges to uphold Kelly's Constitutional exercise of First Amendment rights contained in the speech in her petitions which do not conform to standardized religious belief, exercise of belief or religious-political association, since her religious beliefs are so unique they cannot be automated or boxed into standards.

X. Whether eliminating life time appointments of US Supreme Court judges eliminates the impartiality of the judges by tempting them to be partial to who maintains, reappoints or otherwise controls their seats as opposed to the impartial application of the rule of law. And further, whether federal Appellate and District Court judges' term of years tenure should be replaced with life time terms unless retirement, appointment of another position or impeachment so as not to make unfair partial forums partial towards those who maintain their position.

XI. Whether Congress may commandeer the Supreme Court to draft rules requiring they waive the 5th Amendment right against self-incrimination, and possibly setting them up for **ex post facto** character evidence, despite good behavior, given disciplinary rules allow ex post facto evidence as to character and conduct in attorney and judicial disciplinary cases. So, there is a similar risk federal judges may be threatened and extorted to bend their will to the dictates of those who behave like mobsters by threats instead of using their minds in cases or controversies or impeachment.

XII Whether regulating federal judges, including district court and appellate judges, by disciplinary rules and requiring term limits makes federal judges partial to the regulations and those who wield the power to regulate as opposed to the impartial application to the Constitutional rule of law violating my religious beliefs as a party of one against partiality.

XIII. Whether Courts must allow lawyers to correct judges and courts within the purview of the Constitution 1. in cases and controversies or 2. Impeachment without retaliation in order that the courts may uphold the constitutional rule of law and guide otherwise misguided parties "as to what the law is" to improve and uphold the administration of justice. Marbury

XIV. Where federal judges may only be corrected within the purview of the Constitution's limits of 1. Cases and controversies, and 2. Impeachment to preserve the Constitutional checks by the only branch that safeguards our Constitutional liberties from being sacrifice to serve fickle mob lusts through the vote by the other two branches.

XV. Whether the Third Circuit abused its discretion in bad faith, in clear error of law, and clear error of fact as to cause manifest injustice against me by its orders dated June 30, 2023 in dismissing my case while simultaneously denying my motions for a stay, motion for time, motion to vacate an order limiting my motion for an extension of time to three pages given the voluminous reasons time is required and limit on filings under the threat of sanctions given my Motion for reconsideration of Order dated January 17, 2023, with regards denial of waiver of costs, to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, and compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights and invocation of the 13th Amendment, motion to correct the record given the lower court misfiled 1000s of papers and placed another pro se claimants health records, and other motions, given the two orders deprived me of the Constitutional First Amendment right to petition under a motion for a rehearing under FRAP 40 on these orders and the order denying Kelly's motion to recuse Judge Scirica and Judge Phipps as to deprive me the opportunity to petition and fair opportunity to be heard in violation of procedural due process, denying my Motion to stay this case until the civil rights proceeding is concluded with no possibility to appeal, under the extraordinary circumstances where I face irreparable injury in terms of loss of private Constitutional rights, including but not limited to First Amendment rights to petition, speech, religious belief, exercise

of religious belief, association, other claims and am threatened with potentially 6 needless additional law suits where my exercise of Constitutional rights face further restraint to :

1. Prevent loss of fundamental rights and claims in this case and the civil rights case,
2. Prevent potentially 6 needless lawsuits;
3. prevent duplicity of potentially conflicting decisions in parallel disciplinary cases and in this case and the civil rights.
4. prevent potentially needless unaffordable costs relating to duplicated litigation on the same issues from becoming a substantial burden upon my access to the courts, creating an obstacle so great as to deny me access to the courts to defend my license and exercise of fundamental rights, given my poverty and religious objection to debt, and invocation against involuntary servitude, especially given the original disciplinary order prevents me from working in the profession of my free choice
5. prevent a government compelled violation of my religious belief against indebtedness in order to exercise my right to petition the Court in defense of the exercise of fundamental rights and license(s) by increase in needless, duplicative material costs, time and lack of access or limited access to resources including research;
6. prevent government compelled involuntary servitude in violation of my asserted 13th Amendment right in exchange with access to the courts to defend my licenses and liberties from being taken away but for my religious beliefs in Jesus reflected in my speech contained in my private petitions,
7. prevent the risk of loss of my fundamental rights to religious belief, religious exercise of beliefs, political and religious speech, association and the right to privately petition to the courts to address grievances to safeguard my exercise of religious belief

without state persecution but for disagreement with my religious-political speech contained in my petitions, before the Delaware Courts.

8. prevent the chilling of the exercise of First Amendment liberties by the public or other professionals who may fear reprisal in the form of the loss of their license or threat of character assassination b being deemed mentally disabled but for their exercise of individual liberties merely because the State disagrees with their First Amendment beliefs, or their petitions or their attempt to hold the government, including government agents of both state and federal government to the limits of the Constitution.
9. prevent harm to my health and life. My health has diminished. I require time to maintain my health and life, in light of my specific permanent weakness related to a past surgery in my youth, which Defendants and all courts in related litigation have been apprised of, even the Delaware Chancery and Supreme Court. Without time to accommodate my weaknesses my health will diminish further, jeopardizing my life. (Citing, US Amendments I, V, XIII).
10. Given there is a reasonable probability that four Justices will consider the issue sufficiently meritorious to grant certiorari or to note probable jurisdiction; (2) a fair prospect that a majority of the Court will conclude that the decision below was erroneous; and (3) a likelihood that irreparable harm will result from the denial of a stay.
11. The public, the Court and the Defendants are not prejudiced by a stay pending conclusion of the civil rights case.

12. In addition, in my other appeal and on the record below in this case, I indicate my belief the courts are in danger. I believe my appeal for the Third Circuit matter may stifle the plans to eliminate courts, before a far worse scheme is implemented. I must be afforded an opportunity to provide evidence of my belief. It is the mere opportunity to be heard I seek to protect not the guarantee.
13. The public is harmed if a stay is not granted.
14. The balance of the equities require a stay to prevent the loss of my fundamental rights because I had the courage to imperfectly defend them in the Delaware Courts.

XVI. Whether considering the factors outlined in XIV above the US Supreme Court must grant a stay in this case should the case be remanded, and whether this Court may reverse the decision to safeguard my First Amendment right to petition to prevent the irreparable loss in term so loss of Constitutional rights forever in the state of Delaware and other irreparable harm.

XVII. Whether this Court should resolve the split in the Third Circuit and Fourth Circuit concerning whether a claimant may appeal an order denying recusal of a judge prior to a final determination on the merits, in light of the dissent brilliantly distinguishing Supreme Court case Order on this issue at *Martin v Knox*, 112 S.Ct. 620.

XVIII. Whether the Appellate Court abused its discretion in denying my Motion to recuse Judge Phipps and Motion for a rehearing to recuse Judge Phipps so as to deny me a fair proceeding in violation of the 5th Amendment right to procedural due process, given this reciprocal disciplinary law suit arises based on my Freedom Restoration Act Law suit against President Trump to alleviate a substantial burden upon my exercise of religious belief by dissolving a course of conduct I argued established government religion, when Judge Phipps was twice nominated to the US Supreme Court, I moved to recuse him in the civil rights case, the

state's false allegations testified in his head without an opportunity to cross examine them in this separate suit when the temptation to rule against me with the very real prospect of a reward in terms of appointment to the US Supreme Court in light of the fact there is a high likelihood of a vacancy and Phipps' appointment in light of the threats and pressures to force justices to be impeached or retire tempting an ordinary person should they be placed in Phipps' position to be unduly prejudiced against me and for opponent, especially since President Trump is popular and is likely to be reelected, and given Phipps' ruled against me in the civil rights case and this case.

XVIX. Whether the Appellate Court abused its discretion in denying my Motion to recuse Judge Scirica and Motion for a rehearing to recuse Judge Scirica so as to deny me a fair proceeding in violation of the 5th Amendment right to procedural due process, given he too ruled against me in the civil rights case, allowing a different parties testimony which I did not have the means to contest due to the threat of sanctions testifying in this case, and given I opposed Delaware Disciplinary rules and Delaware disciplinary proceedings on the record, which reflect the federal judicial rules Scirica drafts, and I seek to render those rules unconstitutional in both the civil rights case and this case, given the common person would be insulted and rule against me given I oppose Judge Scirica's rules and seek to overturn his hard work.

XX Whether Justice Scirica or Phipp's participation violated due process rendering the orders they rendered void or voidable requiring the orders below be vacated. US Amend I, V.

XXI Whether Third Circuit Court of Appeals abused its discretion by failing to file either of the two amended notices I filed in response to the August 7, 2023 order by Judge Diamond in the District for the Eastern District of PA Court filed in bad faith to increase costs needlessly as to cause me to forgo access to the courts as to deny me the First Amendment right

to petition by preserving the record should the case be remanded or reopened essentially vitiating my Constitutional rights and other claims I seek to protect.

XXII. Given I filed an amended notice by mailing the same and emailing the same on August 7, 2023 to the District Court, which it did not file, but gave to the Third Circuit, wherein I never received official filed notice or a letter of rejection, when it is customary for Courts to send back rejected documents, just a verbal request from District Court staff to change the heading to Eastern District Court and they would file it despite filing my initial notice with the heading Third Circuit Court of appeals, when neither the Eastern District Court, nor the Third Circuit Court filed the first notice, and the Third Circuit indicated it docketed the notice by allowing me to file it, while setting up a booby trap by creating a new case Number where Solicitor appears to be opposing counsel to create the burden to my access to the courts my Amended Notice was meant to prevent vitiating the rights I sought to preserve should the case be remanded or reopened.

XXIII. Whether the Third Circuit's denial of my motion to exempt costs, taxes and any other fee must be overturned in order not to violate my First Amendment rights to petition, religious beliefs against debt misleading people to certain damnation in hell by making mammon God in violation of Jesus Christ's teachings in Matthew 6:24, my invocation of the 13th Amendment, and my poverty making fees and costs obstacles to my access to the Courts below, and other courts as to deprive my of the First Amendment right to petition to defend Constitutional rights thereby vitiating my Constitutional rights and claims forever, especially my protected right to religious belief in Jesus Christ as God not money or material gain as God without government persecution.

XXIV Whether Kelly's Special appearance as capable of repetition yet evading review under current case law allows other lawyers to specially appear before the US Supreme Court without fear disciplined attorneys' hope of a hero will be their attacker who will attack them more quickly under Rule 8 should they exercise their First Amendment right to petition attorney discipline orders on Constitutional defects or other Constitutional grounds, thus chilling the First Amendment right and other liberties of Citizen lawyers or whether the courts should create a new rule to safeguard Constitutional rights from citizen lawyers who should not be compelled to sell freedom for a license to buy and sell. See the Bible's reference referring this to the mark of the beast.

XXV If this court seeks to discipline Kelly in response to her request for help whether they should place her license on inactive disabled in the Eastern District of PA Court to prevent its own court from initiating a law suit against Kelly, and prevent the initiation of 6 more needless lawsuits based on the bad faith of Appellant to render an order to get out of correcting over 2,000 pages of misfiled documents showing relevant information of Delaware or other reciprocating Court's mistreatment or condoning mistreatment of Kelly based on the her religious beliefs, place of origin, or exercise of Constitutional protected rights, including another pro se claimants medical exhibits, to prevent her from not having enough stamps, paper to continue this appeal, the appeal and hopefully remand in the civil rights case, and the appeal in Kelly v PA ODC so as to deprive her of 5th Amendment fair access to the courts to exercise her First Amendment right to petition to prevent the vitiation of her constitutional rights and other claims forever.

XXVI Whether Federal Disciplinary proceedings violate case and controversy requirements.

XXVII Whether Congress violates separation of power issues by enacting 28 U.S. Code § 144, 28 U.S. Code § 455, 29 CFR § 2200.68, or other regulatory or disciplinary rule or requiring self-regulations by creating the danger of the deception manipulated marketed by third party distortion of appearance to commandeer the court without a case or controversy which pressures the court to be concerned with the lie of appearance instead of actual justice. Whether Procedural Due process and Equal Protections arguments are sufficient to require recusal of judges or overturning of decisions based on unfair partial participants of the court which the appellate court, and the entire forum wherein a party requests recusal not the alleged partial participant must determine of failure to recuse makes the proceeding constitutionally defective.

XXVIII Whether attorney disciplinary rules and statutes violate the constitution and whether judges' powers in an actual case and controversy to correct or even discipline attorneys is sufficient.

XXIX Whether this court may include any other issue on the record or before this court that I addressed on the record below, or in this appeal or that is pressing before this court to preserve the judiciary and the rule of law that binds these United States from schemed dissolution or other harm in the interest of justice to afford any relief this court deems just and fair, especially a grant of time for an opportunity to research and draft additional pleadings should this court require or to allow this to be the only pleading given my poverty and limited resources with leave for the court to consider the important issues with a waiver of my opportunity to be heard in person or in paper further.

LIST OF PARTIES

The parties are listed on the caption.

CASES DIRECTLY RELATING TO THIS CASE

Kelly v Swartz, et al, Delaware District Court No. 21-1490, and Third Circuit Court of Appeals Matter No 21-3198. US Supreme Court filings *Kelly v Swartz et al* 22A747, *Kelly v Swartz et al*. 22-6783, *Kelly v Swartz et al*. 23A100.

Kelly v Trump Chancery Court No. 2020-0809, Delaware Supreme Court No. 119-2021, US Supreme Court No. 22-5522

Kelly v Democrats Delaware Chancery Court No 2020-0157.

The Original disciplinary case in Delaware Supreme Court matter No. 22-58 and IMO Meghan Kelly Number 541 regarding to appointment of counsel where I was denied copies or access to the filed pleadings. US Supreme Court application 22A476 *Kelly v DE Office of Disciplinary Counsel*.

Reciprocal disciplinary case Eastern District of PA matter No 22-45, Third Circuit Court of Appeals No. 22-3372.

Reciprocal Disciplinary case I believe is stayed Delaware District Court No. 22-341.

Reciprocal Case in the Third Circuit Court of Appeals 22-8037. Reciprocal disciplinary case before the US Supreme Court *Kelly v Third Circuit Court of Appeals* No. 22-6584 and application No. 22A478.

PA Supreme Court No 2913 DD3, US Supreme Court filing *Kelly v Pennsylvania Office of Disciplinary Counsel* US Supreme Court Numbers 22A981, 22-7695

DC and the US Supreme Court have refrained from discipline, DC based on jurisdiction.

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Appendix A Order dated July 26, 2023 denying

- 1) Motion by Appellant Meghan Kelly for Reconsideration of Order Dated June 20, 2023 denying the recusal of Judge Phipps and Judge Scirica and Pursuant to FRAP Rule R. 2, 35, 40 for a en ban rehearing of Motions denied by this Court on June 30, 2023:
- 2) Motion filed by Appellant Meghan M. Kelly to Expedite DI 49-50 Motion for Reconsideration of Order Dated 6/20/23 denying the Recusal of Judge Phipps and Judge Scirica and Pursuant to FRAP Rule 2 for an en banc rehearing Consider Motions denied by this Court on 6/30
- 3) Motion by Appellant Meghan M. Kelly to Reopen Appeal;
- 4) Motion by Appellant Meghan M. Kelly for Reconsideration of Order dated June 30, 2023;
- 5) Motion by Appellant Meghan M. Kelly for Reconsideration of Order Dated June 30, 2023 denying Motion for Extension of Time to File Brief on Appeal
- 6) Motion by Appellant Meghan M. Kelly for rehearing on papers/reconsideration of Order dated June 30, 2023 regarding 3 motions to vacate Order dated May 19, 2023 with regards denial of waiver of costs by threatening me with costs, to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, and compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights and compelled violation of my invoked 13th Amendment right against involuntary servitude,
- 7) Indirectly denying Motion for a rehearing on denial of a stay and all outstanding motions not addressed.....1

Appendix B Order dated June 30, 2023 denying

- 1) Unopposed Motion by Appellant Meghan M. Kelly to Vacate order dated 05/19/2023;
- 2) Unopposed Motion by Appellant to Amend Correct Motion to Vacate to Include Pursuant to Fed. R. App. Proc R 27(b) and Rule 40;
- 3) Motion by Appellant to for Leave to Exceed Word Limit for Corrected Motion to Vacate Order dated May 19, 2023;
- 4) Motion by Appellant to Correct the Record, Specifically District Court Docket Item, DI 12 under Rule 10 (e)(2)(c) and Rule 27;
- 5) . Motion by Appellant for Extension of Time to File Brief and Appendix for 120 Days to appeal the lower court's order placing license on disbarred as retired but for religious beliefs, religious political beliefs, and religious political speech contained in petitions;
- 6) Motion by Appellant Meghan M. Kelly to stay of this proceeding including briefing, with the allowance of 30 additional days, when the stay is lifted at the conclusion of case 21-3198.

Appendix C Clerk Order dated June 30, 2023 dismissal for failure to prosecute

Appendix D Order denying recusal of Judge Phipps and Judge Scirica

Appendix E Clerk Order threatening sanctions for placing misfiled docket items below and relevant other documents to refer to by reference in my attempt to reduce the appendix, and limiting my motion for an extension of time to 3 pages in bad faith given my religious objections

to debt, poverty creating an obstacle to my access to the courts and invocation of the 13th Amendment.

Appendix F Clerk Order dated **February 1, 2023** denying Motion for reconsideration of Order dated January 17, 2023, with regards denial of waiver of costs, to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, and compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights, “to be referred to the merits panel once briefing is complete”

Appendix G Clerk Order dated January 17, 2023, denying Motion by Appellant to exempt costs due to utter poverty and due to foreseeable costs creating a substantial burden upon access to the courts and forced violation of religious beliefs by threat of indebtedness

Appendix H Order refusing to docket the Amended notice of appeal filed with the Eastern District Court, causing the Eastern District Court of PA not to docket the first and second notice I filed with the Eastern District of PA that were not returned.....1, 70

Appendix H-1 22-3372 3DI 62, transcript, Amended Notice of Appeal filed in District Court dated 8/7/23, attached Order dated 8/7/23 denying Motion for permission to use electronic filing, email to Appellee which staff previously indicated was acceptable for filing and previously filed before court changed its mind, with a mailed original copy sent per the attached envelop.....1, 70-85

Appendix H-2 Amended Notice of Appeal to include Notice of Appeal to a Court of Appeals from an appealable Order of the United States District Court for the Eastern District Court for the Eastern District of PA Docket Number 33 Case No. 22-45, stamped DI 34, dated 8/11/23, filed 8/14/23., attached order denying ECF access, transcript, exhibit containing documents found in H-1, with envelop for the 8/11/23 second amended notice of appeal which unlike the first one was docketed.....1, 70-85

Appendix H-3 Electronic Notice **IFP Granted for Notice of Appeal**.....1, 70-85

Appendix H-4 Electronic Notice “**No feed paid, no IFP filed**” Appeals Clerk (fdc) Modified 8/15/2023 (lisad) by District Court.....1, 70-85

Appendix H-5 Order by Eastern District Court, dated 2/8/23 granting In forma pauperis status, DI 29.....1, 70-85

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Appendix K Letter to Honorable Judge and Panel Leader Paul S. Diamond, dated October 22, 2023, regarding I had no transportation. I requested PA Office of Disciplinary Counsel for a stay. I seek to preserve my life and health. I explained I had surgery as a youth which forever harmed my life and requires time to sustain my life and health as I face severe dangerous dehydration a week each month and longer if I am not afforded time to rehydrate, rest, eat and exercise. I have religious objections to healthcare and believe people will be thrown into the fires of hell for exploiting my weakness for profit as they did when they wrongly took one of my

organs, should they not repent. I indicated to Justice Diamond I collapsed due to severe dehydration as I filed documents by bike in another case. My bike's tire got flat and I live miles from the post office. I asserted my right to live, and incorporated this as evidence of why a stay is necessary in my case.

Exhibit A and B thereto emails and pictures of flat tire sent to opposing counsel in other cases

Exhibit C thereto Letter to PA Office of Disciplinary Counsel Anthony Sodroski, dated September 3, 2022, requesting his stance on a stay given I had 6 other potential law suits, and an appeal to the US Supreme Court, faced poverty creating a substantial burden to my access ti the courts, people talked about shooting me, and in fact someone did shoot two bullet holes into the home of a friend due to speech they found repugnant incited by government incited unhealthy backlash for those not supporting Republicans, Trump or candidates with shared views

Exhibit D thereto, Response from PA ODC, Anthony Sodrowski indicating he does not agree to a stay

Exhibit E thereto, Exhibit 43 which includes

1. Newspaper article I drafted published in the Coastal Point, Representative candidate says health is wealth, dated July 20, 2018, Coastal Point, Guest Column, *Representative candidate says health is wealth*, By Meghan Kelly, Esq., Candidate Delaware House of Representatives, 38th District,
2. "Your Health is your Wealth You are Priceless. Not a price tag! Kelly seeks Federal Consideration of Health Care Proposal,
3. Meghan Kelly's teaching certificate, which goes to credibility. I learned psychology and behavior theories like BF Skinner's. I also am licensed to teach health so I know something about health.
4. Meghan Kelly's redacted law school transcript to show she took a course Health Care Finance and the course Law and Medicine while attending Duquesne School of Law.
5. Evidence of surgery that requires I drink water, rest and eat so I do not faint or die due to dehydration when I have my period. I lose five pounds every month. This is still a challenge. I must assert my right to live because many people serve Satan by not wanting to be inconvenienced to care to adapt to safeguard my life, or the lives and health of others. Health care record.
6. Meghan Kelly's redacted undergraduate college transcript to show she took relevant courses related to
 - a. History of Western Medicine
 - b. Economics
 - c. Medieval Philosophy
 - d. Psychology courses

7.Delaware State Police, Camden public alert, two bullets when into the home of my friend Gregory Layton former newspaper reporter at the News Journal because of his political speech incited by Former President trump's incitement of violence against dissidence to the Republican party, platform or Trump

8. Pictures of substance thrown at my car in retaliation for the religious-political speech contained on the stickers I designed on my vehicle.....10, 70 -85

Appendix L Petitioner Meghan Kelly's Petition for a rehearing on the 11/13/23 order denying petition for a rehearing submitted 10/18/23, denied on 11/13/23 to consider intervening causes of substantial or controlling effect concerning my arguments and other claims not previously considered which will vitiate my rights should the court not hear this rehearing in US Supreme Court case No.22-7695, Related Application No. 22A981, Meghan M. Kelly, Petitioner V Office of Disciplinary counsel, aka Pennsylvania Disciplinary Counsel On Petition for Writ of Certiorari to the Supreme Court of Pennsylvania, Western District of PA, Case Number 2913 DD3.....32-33, 34

Exhibits to Appendix L PDF labeled Emergency filing meg Multiple exhibits in electronic format only wherein Meg does not attach all exhibits contained therein

- Letter To Donald Baker dated December 4, 2023
- News Article posted in Desert News, *Senate Judiciary Committee issues subpoenas to private citizens connected to Clarence Thomas*, By Eva Terry, dated Thu, November 30, 2023 at 8:28 PM EST
- Exhibit 1 Certificate of Receipt of December 1, 2023 filing of Second Petition for a rehearing, postal tracking, pictures of boxes dropped off, US Police receipt
- *PETITIONER MEGHAN KELLY' SECOND PETITION FOR A REHEARING ON DENIAL OF A WRIT OF CERTIORI LIMITED TO INTERVENING CAUSES OF SUBSTANTIAL OR CONTROLLING EFFECT CONCERNING MY ARGUMENTS AND OTHER CLAIMS NOT PREVIOUSLY CONSIDERED WHICH MAY VITIATE MY RIGHTS SHOULD THE COURT NOT HEAR THIS REHEARING*, dated Nov. 30, 2023
- 124th Affidavit, dated 11/24//23, wherein I discuss denials of other documents which appeared in deprivation of my 1st Amendment right to access to the courts by PA Supreme Court and the United States Supreme Court including the attached motion at
- Exhibit B, *Petitioner Meghan M. Kelly's Motion for an exemption from the requirement to serve 10 paper copies of pleadings with this Court pursuant to Rule 12(2), 29(1), and 39(2), by the filing of one paper copy, and in addition to, or in the alternative of, permission to serve the United States Supreme Court electronically without a paper copy for future filings, due to costs relating to printing, mailing and transporting pleadings to the Post Office, creating a substantial burden upon my access to the Court's to defend my exercise of fundamental rights, and forced violation of religious beliefs by the threat of indebtedness*
- Letter denying motion despite case indicating the court has jurisdiction to grant the relief, *Snider v. All State Administrators*, 414 U.S. 685 (1974), albeit it denied it under the facts of that case.
- Petitioner Meghan M. Kelly's Supplemental Brief to provide additional information not previously available on how private partnerships with the UN is schemed to be used to eliminate

judicial authority in open and by stealth, Petitioner's belief the courts are in danger especially with the debt ceiling approaching November 17, 2023 with no agreement to date, and the convening of Congress October 19, 2023 to attack Justice Thomas and the integrity of the court by subpoenaing witnesses to be used against Justice Thomas and the Court, submitted Nov. 6, 2023.....32-33, 34

3rd Circuit Docket Item 56 (3DI 56) for the case below No. 22-3372 **Appellant Meghan Kelly's Motion for Reconsideration of Order dated June 30, 2023 denying stay under Rules 2, 40, 1st, and 5th Amendment asserted rights to prevent irreparable injury**, and exhibits thereto including,

3DI 56-3 Ex A and B Order denying Stay and Order Dismissal by Third Circuit in this case (pg 18-22)

3DI 56-4 Ex C, Motion to Reopen July 10, 2023 Third Circuit Docket Items (hereinafter "3DI") 3DI 53, 3DI 54, 3DI 55 in 22-3372 incorporated in full, attached in part) (pg 23-39)

3DI 56-4 Ex D, (Initial Civil Rights Complaint in DE District Court Kelly v Swartz, et al. 21-1490, though I moved multiple times to amend to include new and additional claims, parties and to shorten it, not included herein) (pg 40-136)

3DI 56-4 Ex E Email to Delaware Supreme Court regarding swearing in violates religious belief, sadness years later when Court disregarded my request to affirm for disobeying Jesus Christ (pg 137-140)

3DI 56-5 Exhibit F Motion before DE Supreme Court in disciplinary matter to be excused from the notary, declaration and swearing in requirements so as not to violate my religious beliefs with two scriptural examples on how two dads violated this command which led to sin, death and their likely damnation in the fires of hell for compromising what is right to please people or for what is profitable at the cost of losing their souls in hell if they did not repent before they died. Repent does not mean saying sorry and making amends. It means be made clean and sin no more, and misguided are those who turn back to their sins without repentance. Forgiveness is revoked and the wrath of God losing eternal life not salvation remains. (pg 141-157)

This contains an exhibit from an England case from 1678 where a man because of his religious beliefs could not swear before the Court. Jesus teaches let your yes be yes and no be no anything else is evil. He says from the evil one, but it makes people evil to be at risk as being too disgusting to live to be destroyed in hell by compromising doing what is right to loyalty to contracting your soul to hell to gain the hope of the word here. Other people's souls are not for sale. They are free not products to exploit for material gain under the lie of the common good, public welfare, welfare of the state, public welfare or other deceit that misleads humanity to harm and loss of eternal life on judgment day. (pg 157)

3DI 56-6 Exhibit G Letter to DE Supreme Court Justice, The Honorable Henry DuPont Ridgely, dated October 1, 2012, regarding Delaware state judges exhibiting and teaching lawyers to have place of origin animus against DE attorneys associated with other states, with specific

examples of discrimination based on birth in Pennsylvania or association with, and disparate favoritism based on mob marketed reputation not truth and money brought in which creates injustice based on deception and appearance in place of truth. See Jesus's teachings in John 7:24 "Judge correctly not based on appearance (pg 158-160)

3DI 56-7 Exhibit H, I bumper sticker I created based on correcting judicial bias and other prejudice, exploitation of outsiders based on sex, race, religion or origin (pg 161-170)

3DI 56-7 Exhibit I Three newspaper article I drafted and one where I was in based on political ideas to revise laws. (pg 171-180)

3DI 56-8 Exhibit J first petition to Delaware Judge concerning exemption from appointment in family law cases due to religious objections, request for removal on future appointments (pg 181-183)

3DI 56-9 Exhibit K Second request to please remove my name from family court appointments as violative of my religious beliefs in God's teachings in the Bible, especially Malichi and Jesus Christ's teachings (pg 184-186)

DI 56-9 Exhibit L Lawsuit for which the original discipline arises Kelly v Trump Chancery Court Case No. 2020-0809, DE Supreme Court Case No. 119-2021, US Supreme Court Case No. 21-5522 (pg 187-310)

DI 56-10 Ex M Kelly v Democrats and Department of Elections, Complaint, Case No. 2020-0157, Title, PLAINTIFF'S CASE FOR CHRIST, PLAINTIFF'S COMPLAINT AGAINST DEFENDANTS FOR THEIR VIOLATION OF THE EQUAL PROTECTIONS CLAUSE, IN THIS CLASS OF ONE, UNDER THE 1ST AMENDMENT APPLICABLE TO THE DEFENDANTS VIA THE 14TH AMENDMENT, FOR DEFENDANTS UNLAWFUL APPLICATION OF 15 DEL.C. § 3103, CONDITIONING PLAINTIFF'S RIGHT TO RUN TO OFFICE, ON THE EMILINATATION OF OTHER FUNDAMENTAL RIGHTS, AS APPLIED TO PLAINTIFF (pg 311-368)

DI-56-10 Exhibit N, Petition to US Supreme Court for exemption on signature and fee requirements to remove the compelled violations of my religious belief in exchange the exercise of another fundamental right, dated, Exhibit page of O (pg 369-377)

DI 56-10-11 Exhibit O Picture of Republican Rep Steve Smyk and I, He rescued me from attacks from Rep. Ron Gray along with Senator Coon's body guards and Officer Hughes of the Georgetown police now retired (pg 378-379)

DI 56-12 A 4 wrongly sealed Motion to Reign in the courts arms and exhibits thereto filed in Kelly v Trump, *Kelly's Motion to the Delaware Supreme Court to rein in its arms from unlawfully pressuring me to forgo or impede my case to protect my free exercise of religion*, and exhibits thereto, , including December 1, 2020 letter to Master Patricia Griffin of the Chancery Court regarding my belief I received disparate treatment by the court's staff based on religious belief, political association or poverty; emails, Internal Exhibit, Oct 19, 2020 letter to Patricia

Griffin regarding I am acting as a party not as an attorney, DE-Lapp threatening email, Internal Exhibit, letter dated May 21, 2020 (pg.380-417)

DI 56-13 A-5 wrongly sealed motion to recuse Justice Seitz prior to learning the entire incited the state attacks against me during Kelly v Trump, *Kelly’s motion for the Delaware Supreme Court to require the recusal of the Honorable Justice Collins J. Seitz*, and related exhibits thereto, proof of payment of bar dues, emails to Mark Vavala confirming he did not incite the investigation, Internal Exhibit Letter from the Court in response to my request for exemption of bar dues for all attorneys facing hardship, dated February 5, 2021; attachment relating my concerns relating to recent US Supreme Court cases I disagreed with. (pg 418-451)

DI 56-14 Ex P, 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, in Kelly v Swartz, et al. Civil rights case No. 21-3198 (pg. 452-506)

DI 56-14 Ex Q Appellant Meghan Kelly’s Petition for a Panel Rehearing on denial of above referenced opening brief in Ex. P, in the civil rights case (pg 507-520)

DI 56-14 Ex R Respondent’s reply to ODC’s Corrected Response to Respondent’s Objections to the Report and Recommendation of the Board on Professional Responsibility, in the original Delaware Disciplinary matter DE Case No. 541, 11537 B Board Matter and Supreme Court No 2022- 58 (pg. 521-552)

DI 56-15 Proof DE Supreme Court Sealed pleadings in my favor sent to appellee, Email from file and serve representative confirming dates the DE Supreme Court sealed my pleadings during Kelly v Trump to conceal evidence in my favir in Kelly v Trump to overturn the case on procedural due process defects, and necessary for the civil rights case, the disciplinary cases and reciprocal cases to prejudice me in favor of the court and the state participants who incited the insidious attacks against me in Kelly v Trump (pg 553-557)

DI 56-16 Respondent Meghan Kelly’s Motion for leave to exceed the word limit in her Motion for Reconsideration of Order dated June 30, 2023 denying stay under Rules 2, 40, 1st, and 5th Amendment asserted rights to prevent irreparable injury (558-566)
.....4, 7, 10, 20, 21, 22, 23, 35, 115-132.
133-143

19th Affidavit regarding delay in docketing by the US Supreme Court again, wherein I state “On Monday, March 27, 2023, the Supreme Court received a different emergency application from me. Today is March 31, 2023. The Court has been in physical possession of the paper copies of that emergency application for about 5 entire days, but it is not even noted as docketed or rejected at this time. See the attached for a copy of this email, and the exhibits thereto. Delays in docketing pleadings prejudice me by rendering me without time to know whether I should file a petition. If the Court denies a stay and an interim stay within the next few days, it forecloses my right to Petition in the Delaware case...” and exhibits thereto,

- Exhibit A Emails delay in docketing and the irreparable injury I face at delays
- Exhibit 1 Proof submission 3/21/23, second application to justice Jackson disparately deleted
- Exhibit 2 Different electronic proof of electronic submission rejected from filing but not deleted
- Exhibit B Letter dated July 21, 2021 in *Kelly v Trump* where I expressed concerns to the Delaware Supreme Court concerning the elimination of fiat currency in the letter
- Exhibit C Fed Now Central bank eliminating small banks and the human component down the line
- Press Release by Federal reserve dated March 15, 2023 indicating FedNow would be unleashed April 2023
- BlackRock Delaware entity information
- Artesian and other water sources information
- Wireless entity information stocks
- Exhibit E letter indicating March 28 2023 application to Justice Jackson were removed and returned from the docket for case Numbers 22A747 and 22-6783
- Appellant Plaintiff Meghan Kelly's Application to the Honorable Justice Alito to place exhibits back on the Docket to prevent the deprivation of her 5th Amendment Equal Protections and procedural due process right to a full and fair opportunity to be heard without selective, arbitrary, disparate, unfavorable treatment towards her as applied, and to preserve her 6th Amendment right, No. 22-6783, No 22A 747
- March 28, 2023 letter returning second letter, with note March 13 letter not docketed until March 28, delays deprived me of access to other courts as I alleged, irreparable injury occurred and worsens.....4, 31, 32, 33-69, 89

26th Affidavit regarding relief by US Supreme Court would be too late to grant me protection and access to its courts in other cases

- Exhibit A, Third Circuit update by letter dated April 18, 2023 per their order requesting updates
- Exhibit B Docket No 22A747 and 22-6783 conference was moved but still too late
- Exhibit C April 17, 2023 letter by US Supreme Court
- Application to withdraw petition before judgment and application since relief is too late opportunity to exercise asserted right to access to other courts already vitiated with the 3rd Circuit expedition and pending due dates an impossibility for me
- Exhibit D Feb 7, 2023 Letter, writ of cert postmarked Jan 30, 2023 and received Feb 2, 2023 returned because I filed the petition for more pages first and not with the petition which broke my heart
- Exhibit E PA Retirement dated 5/16/18
- Exhibit F Eastern District Court for the District of PA proof showing I thought I was retired and noted it in its pleadings

- Exhibit G Order setting me up indicating retirement in PA makes me retired in Eastern District Court which is untrue, Court setting me up knowing the law and the fact I did not have easy access to it especially since I turned in my tags as car insurance was unaffordable at the time along with gas
- Exhibit H letter confirming I was not disciplined by its court, email confirming I was not disciplined
- Exhibit I Letter Oct 10, 2022 letter status of motions and advising the court of my needs to sustain my life and health and my assertion of my religious right to live not to harm my health of life for the wicked vanity, convenience and material gain of those who commit human sacrifice for moth and rust, the mark of the beast, noting collapsing at the post office and being rescued by a stranger with water from my bike
- Exhibit A email my transportation bike got a flat
- Exhibit B email to opposing counsel and pictures of the bike
- Exhibit C Sept 3, 2022 Letter to where PA ODC Anthony Sodroski requesting a stay to prevent irreparable injury.
- Exhibit D PA ODC response by Anthony Sodroski unreasonably opposing my request for a stay
- Exhibit E proof and assertion of my belief people will be thrown into the fires of hell for not respecting my assertions of health and life and my religious objection to healthcare and mental healthcare, and proposal of improving are terrible healthcare, transcripts, bad treatment record that weakened me for life
- Exhibit F Police showing someone tried to shoot and kill my friend and his wife by two bullets entering their home as they sat at the table and they went over their head for their political beliefs, this is not normal
- Picture someone threw substance at my car for my political religious speech contained on the stickers on my car
- Proof submission to Eastern District Court
- Opinion by Third Circuit, delay in docketing made it too late for me to petition DE order. I needed time given my meager resources, and use of those resources for one thing at a time.
- Exhibit K eye injury I was scared I might go blind, in the petition for more time Alito denied it despite injury to my health.
- Exhibit L E-mail
- Cert of Service.....31, 32, 33-69

77th Affidavit update, dated 9/6/23, filed in DE District Court 21-1490 Docket Item (hereinafter “DI”), 192 with exhibits thereto including

- Exhibit 1 docket Petitioner’s Motion to Correct an error in Kelly’s petition for writ of certiorari in Kelly v PA ODC No. 22-7695, dated 9/6/23
- Exhibit A thereto, the Federal reserve reduced the limit of reserves to 0 instead of the normal 10 percent setting up banks to crash

- Exhibit B Great Narrative excerpts about eliminating paper money, and eliminating the rule of law’s restraints on central banks control of money and debt
- Exhibit C Senator Whitehouse’s complaint and Attorney Rivken’s Rebuttal
- Exhibit 2 Email to Robert Meek and opposing counsel with copies of the November 6, 2023 filings dated Sept. 6, 2023
- Exhibit 3 Proof of Mailing the Sept. 6, 2023 supplemental brief to opposing counsel sheet for Kelly v PA ODC, 22A478.....31, 32, 33-69

93rd Affidavit, regarding my belief in law that requires payment to judges and their staff in a shut down under the circumstance present with focus on attached draft to sue Yellen and Biden to require court pay be funded.....4.

107th Affidavit, wherein Meg disagrees with Justice Scalia and assertions of political questions and believes the court may use words to prevent the use of weapons and wealth to be used to control a no longer free but for sale slave cattle people. Our only hope of a hero to prevent the overthrow of our government sometime after 2050 are the courts, but they cannot save us if they are eliminated or compromised by regulations.....4-5, 9

108th Affidavit, regarding nonlawyers lawyering in DE, where non-lawyers practice real estate law without a license manipulate and mess up on the dead clouding title. I believe this will be used to recoup real property to entities not bound by the law, UN’s partners and the UN.....28

116th Affidavit update, dated 11/15/23, filed in DE District Court 21-1490 Docket Item (hereinafter “DI”), 252 with exhibits thereto

- Receipt of November 6, 2023 11 boxes of the supplemental brief stating “Received Supreme Court Police Office November 6 P 7:19
- Email to Emergency Supreme Court Clerk Robert Meek, dated November 15, 2023 regarding I submitted and mailed out an Emergency Application to reopen 22-7695 to consider Supplemental Brief filed 11/6/23 in order not to deprive me of 1st Amend right to petition fully & fairly in accordance w/5th Amend before eliminating 1st Amend rights to religious beliefs & license
- Attachment of Emergency Application to reopen 22-7695 to consider Supplemental Brief filed 11/6/23 in order not to deprive me of 1st Amend right to petition fully & fairly in accordance w/5th Amend before eliminating 1st Amend rights to religious beliefs & license
- Petitioner Meghan M. Kelly’s Supplemental Brief to provide additional information not previously available on how private partnerships with the UN is schemed to be used to eliminate judicial authority in open and by stealth, Petitioner’s belief the courts are in danger especially with the debt ceiling approaching November 17, 2023 with no agreement to date, and the convening of Congress October 19, 2023 to attack Justice Thomas and the integrity of the court

by subpoenaing witnesses to be used against Justice Thomas and the Court, submitted November 6, 2023, excluding the exhibits thereto

- PDF of US Police Office's receipt dated Nov. 6, 2023
- PETITION FOR A REHEARING ON DENIAL OF A WRIT OF CERTIORI LIMITED TO INTERVENING CAUSES OF SUBSTANTIAL OR CONTROLLING EFFECT CONCERNING MY ARGUMENTS WHICH MAY VITIATE MY RIGHTS SHOULD THE COURT NOT HEAR THIS REHEARING, dated 10/10/23, filed 10/18/23 with US Supreme Court
- Petitioner Respondent Meghan Kelly's petition for writ of certiorari to appeal the Pennsylvania Supreme Court dated February 28, 2023, submitted May 30, 2023
- Email to Lisa Dolph DE Supreme Court Clerk regarding an update on public status
- 114th Affidavit exhibits thereto,
- Exhibit 1 thereto US Supreme Court docket Sheet dated 11/13/23 showing the Nov 6, 2023 Supplemental Brief was not docketed to be considered,
- Exhibit 2 News Article US Supreme Court passed a code of ethics,
- Attached code of ethics, dated November 13, 2023
- Exhibit 3 Newspaper articles regarding Congress's censorship of Congress person Rashida Tlaib's representative viewpoint in deprivation of a segment of her constituents' representation,
- Exhibit 4 and 5 concerning the creation of the Federal Reserve, 16th Amendment and Income Tax in 1913, the creation of the IRS in 1953 regarding beliefs contained in affidavit
- E-mail to Robert Meek Nov 6, 2023 email request that Robert Meek present the emailed version to the justices and my request they be submitted in an expedited fashion so as not to deprive me of the opportunity to be heard
- 92nd Affidavit regarding meg's concerning about preserving the checks and balances by preserving the pay of the court in a shut down and thoughts on a lawsuit against Biden and Yellen to preserve their pay with belief of an overthrow
- Certificate of Service of Application with postage receipt.....31, 32, 33-69

124th Affidavit, regarding unaccountable Nov 6th Supplemental Brief, and other documents the US Supreme Court did not file, and PA Supreme Court filings not docketed

- Exhibit A filings in red not accessible to me on the electronic filing system
- Exhibit B , Petitioner Meghan M. Kelly's Motion for an exemption from the requirement to serve 10 paper copies of pleadings with this Court pursuant to Rule 12(2), 29(1), and 39(2), by the filing of one paper copy, and in addition to, or in the alternative of, permission to serve the United States Supreme Court electronically without a paper copy for future filings, due to costs

relating to printing, mailing and transporting pleadings to the Post Office, creating a substantial burden upon my access to the Court's to defend my exercise of fundamental rights, and forced violation of religious beliefs by the threat of indebtedness submitted to the US Supreme Court but not docketed and letter of return

- Exhibit C Petitioner Meghan M Kelly's Motion for permission to use electronic filing before this Honorable Court, even if my active license to practice law is suspended, in representing myself, in appeals of State Disability Proceedings and in a potential Disability proceeding before this Court, and in all proceedings I act pro se in, including civil rights proceedings and for a waiver of the paper original requirement, to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, and compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights was similarly rejected for filing per the attached letter.
- Exhibit D undocketed Petitioner Meghan Kelly's Motion for Leave to file Different in Forma Pauperis Motion to waive costs due to utter poverty, and due to foreseeable costs creating a substantial burden upon Petitioner's access to the courts and forced violation of her religious beliefs by threat of indebtedness
- Exhibit E undocketed Petitioner Meghan Kelly's Motion to exempt costs and waive Court fees under Supreme Court Rules 38 and 43 eliminate people lawyers and people judges by creating a foundation of immunity from debt or responsibility
- Letter to the US Supreme Court invoking the 5th Amendment wherein the US Supreme Court indicated they did not want any more boxes and to stop sending them reciprocal discipline or disciplinary documents. The Court indicated my invocation of the 5th was sufficient.
- Law review article where the US Supreme Court accepted multiple petitions for rehearing and sua sponte accepted previously denied petitions by reopening cases
- Email to opposing counsel.....31, 32, 33-69

127th Affidavit regarding Supplemental brief properly filed in accordance with Rule 25.6.us Supreme Court on 11/6/23. As of 11/20/23 case manager I have not received acceptance or a letter outlining the deficiency and opportunity to cure in accordance with case law. Discovered another petitioner appeared to be denied access to the courts by the US Supreme Court in contravention to the 1st Amendment based on viewpoint of speech contained in petitions, I attached as exhibit to 127th Affidavit hereto.....31, 32, 33-69

133rd Affidavit regarding the Petition for a rehearing on the Supplemental brief for the PA matter, and exhibits thereto relating to removal of items I filed on the docket and deprivation of access to the courts fully and fairly by changing the pleadings or not docketing them

Exhibit 1 email to US Sup Ct staff and opposing counsel missing 127th Affidavit and 127th importance

Exhibit 2 Docket showing 127th affidavit is missing

Exhibit 3 electronic filing view my side of Dec 7 filings for a rehearing on the Nov 13, 2023 Order.

Application to place exhibits back on the docket US Supreme Court Case No. 22-6783, Application No. 22A747, Kelly v Swartz et al, Appellant Plaintiff Meghan Kelly's Application to the Honorable Justice Alito to place removed exhibits back on the Docket to prevent the deprivation of her 5th Amendment Equal Protections and procedural due process right to a full and fair opportunity to be heard without selective, arbitrary, disparate, unfavorable treatment towards her as applied

Part 2 Second different motion for an interim stay in US Supreme Court Case No. 22-6783, Application No. 22A747, Kelly v Swartz et al

Exhibit 5 Email Dec 9 and attachments thereto showing removed items in my pleading an emergency application to Justice Alito to expedite consideration of an application in Kelly v Swartz, et. al, Case Number 22-6783. in the record, the first exhibit 1 shows the pleadings as I filed them in papers and electronically, the second docket page at Exhibit 2 shows 6 items removed. The third docket page at Exhibit 3 shows Clerk Meek appeared to make partial not complete adjustments in response to my request. Also attached an email by Attorney Yin Toa Zoa providing evidence documents were changed, removed or not docket in violation of the 1st Amendment access to the courts based on viewpoint of speech contained in her petitions, to correct court staff which relates to Kelly v Trump and my assertions before this US Supreme Court that it is bound by the Constitution and must uphold the Constitution by curing defects by its own agents to uphold the law and the courts not to destroy the courts or its staff (emphasis intended)

Exhibit 6 1 copy of Dec 2023 filing returned by letter dated Dec 5, 2023

Exhibit 7 Allstate alleviated warranty concern

Exhibit Appellant's Motion to withdraw her Petition before Judgment and Application to Justice Jackson, since relief if granted will be too late in US Supreme Court No. 22-6783, Application No. 22A747 Kelly v Swartz, since my right to access to the US Supreme Court was already vitiated for the original disciplinary proceeding due to delays in docketing (Emphasis intended).....31, 32, 33-69

Exhibits on Agenda to Eliminate people in the law to eliminate the government that restrains entities from getting as much as they can for as little unrestrained from the just rule of law from oppressing, killing, stealing or destroying human life, liberty or health for the bottom line, and exhibits therein including

- Obituary of Richard Goll, a Delaware attorney who was exploited by an out of state real estate company practicing law without a license
- Newspaper Article I drafted in the Coastal Point on a proposition on how to resolve the fact non attorneys are practicing law without a license
- Article by the Venus project *How can laws be eliminated* regarding a new system to replace governments after 2050
- Excerpts from the Book *Shaping the Fourth Industrial Revolution* By Klaus Schwabb, Founder of the World Economic Forum and Chairman with Nicolas Davis, Copywrite 2018, Published in the United States by Currency, an imprint of the Crown Publishing Group, a division of Penguin Random House LLC.....
- Excerpts from the Fourth Industrial Revolution by Klaus Schwabb.....

- Article by World Government Summit Could an AI ever replace a judge in court?, dated 2017
- Article Robot justice: China’s use of Internet courts By Tara Vasdani This article was originally published by The Lawyer’s Daily (<https://www.thelawyersdaily.ca/>), part of LexisNexis Canada Inc
- Excerpts from The Great Narrative for a Better Future, by Klaus Schwabb and
- and Exhibit 43 which includes
 1. Coastal Point, Guest Column, Representative candidate says health is wealth, By Meghan Kelly, Esq., Candidate Delaware House of Representatives, 38th District,
 2. Document, “Your Health is your Wealth You are Priceless. Not a price tag! Kelly seeks Federal Consideration of Health Care Proposal,
 3. Meghan Kelly’s teaching certificate, which goes to credibility. I learned psychology and behavior theories like BF Skinner’s. I also am licensed to teach health so I know something about health.
 4. Meghan Kelly’s redacted law school transcript to show she took a course Health Care Finance and the course Law and Medicine while attending Duquesne School of Law.
 5. Meghan Kelly’s redacted undergraduate college transcript to show she took relevant courses related to
 - a. History of Western Medicine
 - b. Economics
 - c. Medieval Philosophy
 - d. Psychology courses

6. Evidence of surgery that requires I drink water, rest and eat so I do not faint or die due to dehydration when I have my period. I lose five pounds every month. This is still a challenge. I must assert my right to live because many people serve Satan by not wanting to be inconvenienced to care to adapt to safeguard my life, or the lives and health of others.).....4, 33-69, 93-94, 95

Exhibits showing belief of danger based on partnerships between not only church and state but government backed and condoned foreign and private partners inciting private attacks based on perceived religious or political association or beliefs, including, Email to Bo at the Delaware Department of elections, forwarding an email to Jesse Chadderon at the democrat’s office where I was concerned about a neighbor threatening me for my sign because he previously threatened to ram my car if I park it on my parents side lot, and he allegedly threatened to use his gun should someone at the board of the development come onto his property to inspect it without authorization, pictures of substance thrown at my car, Police report concerning 2 bullets shot into the home of Greg Layton hitting the wall above the dining room table as he and his wife sat there but for his political beliefs incited by Trump-religion, some of my signs I created which caused outrage and attacks, excluding Impeach [Trump] Serve your country not your seat, excluding Impeach [Trump] No one is above the law, No one is below the law and signs I created 4, 28

Letter dated April 26, 2023 and some exhibits not all exhibits thereto including:

Letter to Chief Justice Colm F. Connelly from Meghan Kelly regarding Running motion to allow complaint to be amended to reflect the facts, witnesses eliminated by state, concealed the fact they retired during proceeding, did not allow me to gather discovery from them to hide this fact. (Attachments: # 1 Exhibit Table of Contents of Exhibits and electronic data, # 2 Exhibit A doctored up praecipe Oct 5 2020 I did not know she wrote on it, # 3 Exhibit B ltr to DE Supreme Court, July 12, 2021 regarding staff told me to cross off, # 4 Exhibit C Praecipe with address crossed off, # 5 Exhibit D Praecipe with switched address sheets, # 6 Exhibit E Letter to Master Patricia Griffin regarding I am not an attorney advocate in the case, # 7 Exhibit F Letter to Assigned Vice Chancellor,, # 8 Exhibit G Ltr October 30, 2020, regarding removal, immunity remove, # 9 Exhibit H Letters to Courts requesting waiver of notary requirements, President Trump has covid 19, # 10 Exhibit I Letter from the Court notary requirements, # 11 Exhibit J Letter to Master regarding disparate treatment by court based on religion, political association and poverty, # 12 Exhibit K Letter to Master regarding Chancery Court staff misled me to almost miss the appeal deadline., # 13 Exhibit L Email to David Weiss and opposing counsel regarding Dr. Bunting, Judge Smalls regarding out of state animus and other concerns.....19-20. 90

Meghan Kelly’s waiver of a speedy trial not filed, but drafted during the Delaware Disciplinary proceeding wherein I outline how lawyers infringe and do not preserve right while violating superseding Constitutional laws to enforce laws that violate the same or otherwise harm the public for profit, essentially human sacrifice for material gain which I believe is anti-Christ lawless lust not the impartial rule of law to preserve and protect life, liberty and health as opposed to harm it to create need to serve greed.....30-31

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<i>Brief of the Southern Baptist Theological Seminary, the Ethics & Religious Liberty Commission, the International Mission Board, and Dr. R. Albert Mohler, Jr. as amici curiae in Support of Petitions before the US Supreme Court by the Little Sisters of the Poor Home for the aged, Denver Colorado, et.al, Petitioners v. Sylvia Matthews Burwell, Secretary of Health and Human Serviced, et. al, No.15-105, 2015 WL 5013734 (US).....</i>	19
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**IN THE SUPREME COURT OF THE UNITED STATES
PETITION FOR WRIT OF CERTIORARI**

Petitioner respectfully prays that a writ of certiorari issue to vacate the Orders below and Grant relief this court deems just pursuant to 28 U.S.C. § 2106 and avers as follows:

OPINIONS BELOW

The orders of the Third Circuit Court of Appeals to review the merits of appear at multiple dates: including a denial of a motion to reopen the case to consider my motions for rehearing under FRAP Rule 40, with denial of motions for reargument on a plethora of other motions for reargument, including but not limited to the June 30, 2023 Orders at Appendix (“App”) A, dated 7/26/23, including denial of rearguments of stay, time, vacating order dated 5/19/23, recusal of Scirica and Phipps, and denial of reargument to vacate order dated 6/30/23; 6/30/23 Order denying 1. motion to vacate order dated 5/19/23 limiting motion for time to 3 pages, 2. Motion to correct record, 3. Motion for time, 4. Motion for stay and 5. Other two motions at App B; 6/30/23 Order dismissing the case for failure to prosecute at App C; 6/20/23 Order denying recusal of Judges Phipps and Scirica at App D; 5/19/23 Order limiting Motion for an extension of time to 3 pages and threat of sanctions for violating page limit and order at App E; 2/1/23 Clerk Order postponing consideration of my motions to exempt costs and taxes based on religious belief against debt, poverty creating a substantial burden to access to the courts in the exercise of my First Amendment right to petition to safeguard not merely my property interests in licenses to practice law but my Constitutional liberties, life and eternal life, invocation against the 13th and other arguments at App F; 1/17/23 Clerk Order denying motion to be exempt from costs at App G; 8/8/23 Clerk Order staying action on amended notice of appeal of District of Court’s 8/7/23 order denying Motion for ECF action, which caused the

Court not to file the amended notice of appeal docketed by District Court for the Eastern District Court of PA. (App. H, H1-H-5) There is no opinion to publish.

JURISDICTION

The jurisdiction of this Court is invoked under 28 U.S.C. § 1253, 28 U.S.C. § 1254, 28 U.S.C. § 1651, 28 U. S. C. § 2101 and 28 U. S. C. § 2106.

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

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

STATEMENT OF THE CASE

I. Meg Kelly makes a special appearance in order to assert her 1st Amendment right to petition while reserving her claims and defenses of violation of her right to notice, fair process and fair opportunity to be heard in contravention of Due process applicable to Federal Courts via the 5th Amendment

I file this by making a special appearance so this Supreme Court may not reciprocate in an order passed without **notice** under the circumstances, given the Eastern District Court (“District-Court”) had notice of multiple jurisdictions placing my license to practice law on disabled. While I contest any allegation of mental disability, the Third Circuit who has declared me disabled separately by order may not deem me disabled while ignoring the Constitutional law’s protections this Court has created to safeguard lawyers from disbarment for an adjudication of disability under *Theard v. United States*, 354 U.S. 278 (1957).

Despite the fact the Appellee (“District-Court”) indicated disbarment was not punishment, the District-Court knew I thought I was retired. Due to poverty, and other limitations, I did not have access to the law or even access to a vehicle to drive to the law library for a time the Court entrapped me into disbarment through the District-Court’s Order dated 11/17/22 requiring a memorandum why the 2018 retirement of my PA state license would not cause me to be retired or lose my bar before the District-Court. The District Court knew or

should have known I did not understand and had no notice the District-Court would enter an Order disbaring me in response for its request as to why my retirement from PA in 2018 would cause me to no longer be an active member before its own Bar. The Court knew I was under great duress because I cared about the two Chancery Court staff the Delaware Supreme fired by forced retirement to conceal their testimony in any proceeding in defense of my Constitutional rights, licenses and other claims. Former court staff member Katrina Kruger was a fitness instructor at my former gym. I used to see her every day and the Delaware Supreme Court participated in firing her under forced retirement to conceal her testimony in contravention of US Amend VI applicable to the state via US Amend XIV. I care about former DE Court staff member Arline Simmons too. When I petitioned the court it was to safeguard my rights not destroy those who violated them. I did not want her to lose her job to cover up lawless conduct of the court that snowballed into worse constitutional and legal deprivations of my rights under state and federal law. I reserve my right to plead lack of notice by specially appearing and denial of a fair proceeding. US Amend I, V.

“A State cannot exclude a person from the practice of law or from any other occupation in a manner or for reasons that contravene the Due Process Clause of the Fourteenth Amendment” or the 5th Amendment applicable to the federal government. *Citing, Schware v. Board of Bar Examiners*, 353 U.S. 232 (1957). My Due process rights were violated in this case and in the original Delaware Disciplinary case.

I provided copies of orders adjudicating me disabled to the District-Court. The DE order and reciprocating orders of disability were rendered but for my religious beliefs contained in my speech in my Religious Freedom Restoration Act and establishment of government religion complaint in *Kelly v Trump* where my religious beliefs and the government substantial burden

upon my exercise of religious beliefs but for the establishment of government religion by the president's course of conduct outlined in US Supreme Court Appeal No 22-5522 are in issue.

This US Supreme Court held *Harkness v. Hyde*, 98 U.S. 476, 479 (1878), "Illegality in a proceeding by which jurisdiction is to be obtained, (in my case notice of discipline, order, or the subject of the cancelled hearing and fairness) is in no case waived by the appearance of the defendant for the purpose of calling the attention of the court to such irregularity; nor is the objection waived when being urged it is overruled, and the defendant is thereby compelled to answer."

Judge Diamond tried to get out of correcting the voluminous thousands of pages his staff misfiled when the case manager was out, including another pro se party's health records, attaching two of my motions on the bottom of a separate pleading, and filing things out of order with missing documents evidencing almost 20 years of disparate treatment by the State of Delaware and Delaware Courts in retaliation for my exercise of the First Amendment rights to petition, religious belief, exercise of belief, speech, and association in contravention of the Equal Protections component by political-religious or poverty animus against me and partiality to the selfish interest of those within the government for their individual convenience, productivity, avoidance of costs, profit, position, marketing business or caseload speed at the cost of liberty, life, and health which lawless people claim is for the common good, public good or welfare. (App. 3DI 56) I believe this argument used to eliminate the Constitutional law's restraint upon government and government backed private and foreign partners, government agents, based on human sacrifice of life or liberty under the deception of the welfare of the people will be used

after 2050 when a schemed overthrow is planned to eliminate the rule of law should the courts not stop it.¹

Justice Story explained, “It is easy to understand that the defendant may be at liberty to impeach the original justice of the judgment by showing . . . that it was procured by fraud [or judicial partial whims and temptations for avoidance of work and convenience at the cost of human sacrifice, sacrificing my liberty, health or life.]” *J. Story, Conflict of Laws 2d ed. § 607* (1841) (quoted with approval in *Hilton v. Guyot*, 159 U.S. 113, 190 (1895)).

Wherefore, I pray this Court does not punish me for asking for help in this special appearance. I am scared. People have talked about shooting me but for my religious-political beliefs or presumed beliefs. I also have health limitations where I require time in order not to harm my health or die I have asserted in all of my cases. I assert my right to live as a religious exercise, and my religious belief that people go to hell for trusting in or telling others to trust in or participate in healthcare examinations, treatments or professionals. It makes men and their professional work above the law when they harm, kill, steal or destroy human life or health like a

¹ See, App. Exhibits on Agenda to Eliminate people in the law to eliminate the government that restrains entities from getting as much as they can for as little unrestrained from the just rule of law from oppressing, killing, stealing or destroying human life, liberty or health for the bottom line, and App. Exhibits showing belief of danger based on partnerships between not only church and state but government backed and condoned foreign and private partners inciting private attacks based on perceived religious or political association or beliefs) See, *Caperton v. A. T. Massey Coal Co.*, 129 S. Ct. 2252, 2259 (2009) regarding the requirement of impartiality by the courts as opposed to partiality to selfish convenience or gain eliminating asserted Constitutional law’s limits upon government and government private and foreign agents through partnerships to render oneself above the law. Also see, 19th and 93rd Affidavits regarding economics and debt to be used to eliminate the courts by the lie of self-regulation by eliminating the courts and the rule of law that creates the governments to be controlled by those who control the resources or the channels to access them in a digital slave system that teaches a lie of freedom by eliminating laws after 2050. Look at Exhibit to the 93rd aff with focus on 14th amendment arguments to void debts designed to overthrow the government, and temporary relief under 31 U.S.C. § 5112 (k) and additional arguments. I do not want the courts to draft the law. I want the courts to say what the law is in the form of limiting the other two branches to prevent slavery and require they coin lawfully not in violation of US Amend XIII or my religious belief as applied as a party of one. US Amend I. See, *2052: A Global Forecast for the Next Forty Years* by Jørgen Randers, Published by Chelsea Green Publishing, 2012. *The Report from Iron Mountain on the Possibility & Desirability of Peace* by Leonard C. Lewin, published in 1967 (during the Johnson Administration) by Dial Press, The New World Order, by H.G. Wells, published by Secker & Warburg in January 1940. Also see App 107th Affidavit.

doctor did to me in my youth. I have sincere religious objections to deferment to science, experts or professionals and believe people sin against God by making man and man's creation God in place of God. *Romans* 1:25 ("They exchanged the truth about God for a lie, and worshiped and served created things rather than the Creator—who is forever praised. Amen.").

I assert my First Amendment right to exercise my religious belief against human sacrifice to live for God not the vanity of man even medical knowledge. I have religious objections to evaluations and healthcare and mental healthcare, which is scary to share since Justice Jackson's husband is a doctor. So, this Court obviously may and most likely does disagree with my private religious beliefs. The question is will you safeguard my individual liberty to believe differently from this Court and to exercise my religious beliefs according to the dictates of my conscience, even if every judge on this court finds my religious belief in Jesus as God, not money, man or man's technology, product, studies aka science or professional service God repugnant. Should anything happen to me and I should die it is not by free choice.

During *Kelly v Trump* the Delaware Supreme Court sealed pleadings in my favor where I asserted the Delaware Chancery, Supreme Court and its arms or agents committed procedural due process violations. The Court sent agents and its arms to threaten me to compel me to forgo my appeal to the US Supreme Court. Later the Delaware Supreme Court through Staff-Attorney Robinson signed off on terminating two material witnesses and colluded to prevent me from subpoenaing them in the Delaware Disciplinary proceeding despite my motion of my intent to do so, while preventing me 10 days required in order to subpoena the hidden witness by rescheduling the hearing to 8 days to evade discovery. US Amend VI, Del. Law. R. of Disciplinary Proc. Rule 12 (h). If the DE Courts will sacrifice their own people for their vanity, the mere appearance of justice while committing great injustice, I fear for my safety in the

exercise of my religious belief in Delaware and in the world. My freedom to believe Jesus without government incited persecution may forever be eliminated in Delaware if the courts do not save me and others from the elimination of free exercise of religion in exchange with the ability to buy and sell. *See, Revelation 13:17* (“And that no man might buy or sell, save he that had the mark, or the name of the beast, or the number of his name.”)

I incorporate herein by reference any District-Court Item (“DI”) or Third Circuit Court Docket Item (“3DI”) or any other document I refer to even if not attached hereto in its entirety, the entire records below especially since the papers were mis-docketed and all Exhibits contained in the Appendix, attached exhibits contained in the individual appendix items and any other document referred to herein or attached hereto.

II. Original Order disciplining me and infringing on my license to buy and sell as an attorney but for the exercise of fundamental rights based on State’s religious-political animus violates my 1st Amendment private exercise of rights to religious belief, exercise of beliefs, association, speech, petition, and access to the courts and the 5th and 14th Amendment right to Equal protection and must be vacated and not reciprocated as unconstitutional

This reciprocal case arises based on an order placing my Delaware License to practice law on inactive disabled in retaliation by Delaware for my exercise of private fundamental rights, which initiated the reciprocal lawsuit brought by the Eastern District Court through Judge Diamond against me concerning my license to practice law.

The State of DE placed my DE license to practice law on disability inactive but for my religious beliefs contained in my private speech in my private religious freedom restoration act

petitions in *Kelly v Trump*, and other petitions to safeguard my genuinely held exercise of religious beliefs from a government incited substantial burden. US Amend I, XIV.²

I am a Christian lawyer who was attacked by the state by the request of the Delaware Supreme Court members through its arms and agents to cause me to forgo my lawsuit against former President Donald J. Trump (“Trump”) to punish me for my exercise of the private 1st Amendment rights to petition, private-speech contained in the private-petitions, affiliation, private religious beliefs and exercise of religious beliefs and in retaliation for my 1/7/2021 and 2/5/2021 petitions to exempt bar dues for all attorneys facing economic hardship.

I filed a private Religious Freedom Restoration Act, 42 USCS § 2000bb (1-4) (“RFRA”) lawsuit *Kelly v Trump* in the Chancery, No. 2020-0809, Delaware Supreme Court, No. 119-2021, and the United States Supreme Court, No. 21-5522, as a private party to protect my private-First Amendment 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 Donald J. Trump and current President Joseph R. Biden from enforcing executive orders creating a union of government-religious entity partnerships, 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

² (3DI-56, See A-4, A-5 Complaints *Kelly v Trump*, *Kelly v Democrats* and *Kelly v Swartz*, and petitions to run for office without exchanging one fundamental right for the relinquishment of another by compelled violation of my religious beliefs therein)

Or. No. 13831, May 3, 2018, and Biden's enactment of Ex. Or. No. 14015, Feb. 14, 2021 ("executive orders").³

These executive orders allow money or support to be transferred between government agents and religious organizations to perform government business. I believe the money or support in the bought or bartered for, not free union of church and state, is one reason why religious-political attacks seemed to have increased in recent years, including government incited religious-political attacks against me. 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, to perform government business under the guise of charity.

I believe Jesus teaches people commit lawlessness in the eyes of God for teaching business is charity, help, good or love. It violates God's command of loving one another by driving out unconditional love from the hearts of men replaced with the love of money and material gain, or productivity extracted from others. *Matthew* 6:1-4. It also makes mammon God and savior which causes people who seek to gain the world now to lose their eternal soul in hell. *Matthew* 16:26. I believe many of the churches mislead people to hell as they exploit need to serve greed by collections and fundraising from others under the lie of giving from self. This is the reflection of the image of the dead, those without eternal life should they not be born of spirit by living on bread alone like the world. *John* 3, *Matthew* 4:4, *Citing Deuteronomy* 8:3. Also see Acts and distinguish secular government from spiritual governance, and please note the Bible is not the Word of God. The father, son and holy spirit is the word, including the holy spirit

³ See 3DI-56 initial complaint and US Supreme Court brief in *Kelly v Trump* at Case No 21-5522 on docket

contained in people, including people in the bible.⁴ Jesus teaches you cannot serve God and money. *Matthew* 6:24 Only those who do God's will are saved from death. *Matthew* 7:21–23. So, I believe those misled by the government-church business partnerships to exploiting the needy to serve the greedy will go to hell on judgment day should they not repent by committing deceptive lawlessness under the color of the law in an unfair, partial forced slave economy. I believe Jesus teaches people commit lawlessness (“sin”) for giving charity seen or for giving to get like fundraising for elections, car washes or girl scout cookies leading to loss of eternal life in hell should they not repent. *Matt* 6:1-4.⁵ It is no small sin to mislead others to believing a lie as truth, to believe business is freedom when it makes rights for sale to those who unjustly barter favor in contravention of 8 U.S.C. § 201. The lie of the public good creates injustice by government partiality towards material gain at the cost of sacrificing a free people and their individual Constitutional rights under the deception of the common good, welfare or material gain. Jesus teaches those who worship by business are not welcome in his father's house. *John* 2:16.

“The Establishment Clause prohibits government from establishing a religion in the sense of *sponsorship, financial support, or active involvement of the sovereign in religious activity.*” *Kalman v. Cortes*, 723 F. Supp. 2d 766, 769, (2010)

⁴ In *Matthew* 28:19 Jesus commanded, “Therefore go and make disciples of all nations, baptizing them in the name of the Father and of the Son and of the Holy Spirit.” Jesus did not say the Bible. Even if Bibles cease to be or are distorted my God still is. See, *Exodus* 3:14 ““God said to Moses, “I AM WHO I AM. This is what you are to say to the Israelites: ‘I AM has sent me to you.’”). God still is even if no Bibles or Torahs exist in paper form. The Word of God is written on the hearts of man to accept and reflect or to reject in perish in hell to be no more without eternal life. See, *Jeremiah* 31.

2 Corinthians 3:3 (“You show that you are a letter from Christ, the result of our ministry, written not with ink but with the Spirit of the living God, not on tablets of stone but on tablets of human hearts.”)

⁵ 3DI-56, Affidavit 107 with focus on arguments against fundraising in the exhibits thereto, where I sought an exemption from signatures and see requirements in order not to violate my religious belief to run for office.

I reasonably believed the Executive Orders violated the establishment clause, especially Trump's E.O. 13798 which permits churches to back candidates and parties using the donations from parishioners to serve the political vanity of men which I believe is blasphemy by making man God's anointed instead of Jesus. I believe the executive orders also violates Jesus's teachings in *Matthew* 6:1-4, and 6:24 misleading people to hell under the guise of salvation, which caused me foreseeable emotional distress. I love people. It is a religious exercise of my belief to love others. I do not want them to be misled to harm or hell. *See Bible Isaiah* 9:16 ("For the leaders of this people cause them to err; and they that are led of them are destroyed [in the fires of hell on judgment day as too corrupt to live into eternity in heaven]").

President Trump also incited religious-political persecution against me as a party of one and other people for their projected religious beliefs based on not supporting him in his formal government position, or his Republican party, or the religious organizations which supported his presidential candidacy, including me as a party of one, (as a Christian, Catholic, Democrat who exhibited opposition to Trump by drafting 5 proposed articles of impeachment which I contacted all 541 federal law makers to impeach on), substantially burdening my free exercise of religious belief, **by a course of conduct which I argue also establishes government-religion**, causing people to attack me, **talk about shooting me**, throw things at my vehicle, actually shooting two bullets in the home of Delawarean Greg Layton based on political beliefs, kill, harm or attack others based on religious or political belief substantially burdening my free exercise of religion, speech, and political-religious affiliation, as I outlined in *Kelly v Trump* to this Supreme Court at pages 23-25, including but not limited to:⁶

⁶3DI-56, See App. K, Exhibit C thereto

- “1. appointing a personal spiritual advisor, and alleged Christian leaders to advise the President, creating the religious backing and the appearance of Godly guidance supporting Defendant’s government authority;
2. holding up a Bible in front of a church for a photo op after people were gassed in response to their Constitutional exercise of affiliation and speech at a protest;
3. hypocritically claiming “Biden will hurt the Bible;
4. persecuting people who exercised their freedom to worship or not by the dictates of their own conscience, not government-religious commands, by demeaning those who omitted the word God in the pledge of the allegiance;
5. improperly sharing his alleged prayer to God, while acting under the color of the law;
6. creating the illusion there is a war on Christmas, by liberals like me;
7. repeating the government-religious belief that he may be the chosen one by God, contributing to the government-religious belief Trump is anointed by God;
8. moving the US embassy in Israel to Jerusalem for a religious group, Evangelicals;
9. sponsoring and inciting private persecution towards liberals by churches and its parishioners, by buying loyalty by barter or exchange, even by praise, for a little something down the line, such as bailouts, or power to persuade politicians, at the cost of teaching some preachers and parishioners to persecute non-Trump supporting liberals like me, and including me;
10. tweeting fabrications making it appear democrats like me are attacking the church including the tweet. ‘DEMS WANT TO SHUT YOUR CHURCHES DOWN, PERMANENTLY. HOPE YOU SEE WHAT IS HAPPENING. VOTE NOW;’
11. signing another Executive Order, Ex. Or No. 13831, May 3, 2018, which increases the temptation for government employees, including the President, to back religions financially or otherwise, in hopes to receive their government backing and government support in return under E.O. 13798; and
12. using his son to glorify him as the savior of Christianity, when I believe Jesus the Christ is the savior under Christianity. Eric Trump said his “father ‘literally saved Christianity...there is a full war on faith on the other side, (meaning my democrat side). (Eric continued), ‘The Democrat Party, the far left, has become the party of atheists, and they want to attack Christianity”

The state of Delaware attacked me based on my religious beliefs contained in my speech in my private petitions based on affiliation associated with a license to practice law, affiliation as a democratic, as a Christian and as a Catholic, who does not defer to the Pope or the Church but God through the father, son and holy spirit. This is 4 violations of the 1st Amendment pursuant to the 14th Amendment applicable to the state. My private petitions to alleviate a government incited substantial burden upon my religious exercise contained in petitions relating to bar dues and in a religious freedom restoration act lawsuit, without disparate treatment, collusion by the

government to cause me to forgo my private petitions in *Kelly v Trump* US Case No. 21-5522, witness tampering, and other insidious attacks by the state including but not limited to sending Court of Common Pleas Judge Clark to attack and threaten me at a grocery store is a right all people residing in the United States must be free to exercise without government retaliation based on viewpoint of speech, including licensed professionals. US Amend I, XIV, 42 USC §1985

A license requirement by the Court that compels me to waive my asserted Constitutional rights to private religious beliefs, the exercise of the right to petition to uphold and assert this freedom to exercise religious belief without government incited persecution alleged for my protected speech containing my religious beliefs in petitions to alleviate a substantial burden upon President Trump's establishment of government religion in exchange for the license to buy and sell or otherwise be associated as a lawyer must be found unconstitutional. US Amend I, XIV. "Such license requirements are struck down...when they affect the "enjoyment of freedoms which the Constitution guarantees *Lakewood v. Plain Dealer Publishing Co.*, 486 U.S. 750, 777 (1988). "[T]he constitutional principles ...**forbid the judiciary**, as well as the legislature, of a State **to interfere with the free exercise of religion**. Pp. 190-191. " *Kreshik v. St. Nicholas Cathedral*, 363 U.S. 190 (1960).

I must not be compelled to violate my religious belief in order to regain my license as State Court's opinion requires. Nor should I be punished for my exercise of the right to access to the courts to exercise my private First Amendment right to petition the courts to defend my religious beliefs because the original disciplinary Court finds my citations to the Bible and religious beliefs contained in my speech in my private petitions illogical. Per *Thomas v. Review Board*, 450 U.S. 707, 714 (1981), even if the courts find my faith in Jesus illogical "religious

beliefs need not be acceptable, logical, consistent, or comprehensible to others in order to merit First Amendment protection.").

“To be sure, a state may not condition the grant of a privilege, [a license,] or benefit upon the surrender of a constitutional right.” *Citing, Western Southern Life Insurance Co. v. State Board of Equalization*, 451 U.S. 648, 657-58, 664-65 (1981)

State held my religious beliefs contained in my petitions in *Kelly v Trump* is the reason for declaring me mentally unfit to practice law. *See, Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 682. (“Courts have no business addressing whether sincerely held religious beliefs asserted in a RFRA case are reasonable.”); (See e.g. 3DI 24-11-3DI 24-12, regarding religious belief and citations to bible as source of DE discipline)

The State labels my religious belief contained in my speech in my petitions to be a disability. The United States Supreme Court held in *Trinity Lutheran Church of Columbia, Inc. v. Comer*, 137 S. Ct. 2012, 2019 (2017); “The Free Exercise Clause “protect[s] religious observers against **unequal treatment**” and subjects to the strictest scrutiny laws that **target the religious** for ‘**special disabilities**’ based on their “**religious status**.” *Citing Church of Lukumi Babalu Aye, Inc. v. Hialeah*, 508 U.S. 520, 533, (1993); (“In *McDaniel v. Paty*, 435 U.S. 618 (1978), ‘for example, we invalidated a state law that disqualified members of the clergy from holding certain public offices, because it “impose[d] **special disabilities** on the basis of . . . **religious status**.”’)

The State Court applies discipline in an unconstitutional manner while treating other attorneys who exercised the same rights for which I am punished more favorably without state discipline so long as they align with the government’s belief in money and material gain.

I have been selectively targeted based on subject matter of speech contained in my petitions, without a compelling state interest more important than the protection of my Constitutional rights, which if left unprotected makes other professionals no longer free under the threat of government retaliation.

The object of the application of the state's discipline is to "infringe upon or restrict [my] practices because of their religious motivation, the law is not neutral," as violating the Equal Protections clause as applied to me a party of one. *Lukumi Babalu Aye, Inc. v. City of Hialeah*, 508 U.S. 520, 533-534 (1993), US Amend I, XIV.

The United States Supreme Court held in *Church of the Lukumi Babalu Aye, Inc. v. City of Hialeah*, 508 U.S. 520, 543, 546, 561 (1993),

"The principle that government, in pursuit of legitimate interests, cannot in a [selective manner impose burdens only on conduct motivated by religious belief] is essential to the protection of the rights guaranteed by the Free Exercise Clause. ...A law [as applied to me as a party of one] burdening religious practice that is not neutral or not of general application must undergo the most rigorous of scrutiny. To satisfy the commands of the First Amendment, a law restrictive of religious practice must advance ""interests of the highest order,"" and must be narrowly tailored in pursuit of those interests....A law that is religion neutral on its face or in its purpose may lack neutrality in its effect by forbidding something that religion requires or requiring something that religion forbids. "

A lawyer's right, my right to pursue my profession constitutes a property protected by the due process clause of the 5th and 14th Amendment, and of which I cannot be deprived for any whimsical, capricious or unreasonable cause, including the government's disagreement with my Constitutionally protected religious-political beliefs.

The State placed my license to practice law on disabled to chill my 1st Amendment rights to religious belief, exercise, speech, association and petition but for their religious-political-poverty animus. Conditioning my ability to petition under the threat of government compelled

religious violations and loss of other Constitutional rights such as access to other courts to exercise the 1st Amendment right to petition prejudices me. I must not be compelled to violate my religious belief against debt in order to regain my licenses, safeguard my Constitutional liberties or preserve my other claims. Nor should I be punished for my exercise of the right to access to the courts to defend my religious beliefs because courts and the original disciplinary Court finds my citations to the Bible and religious beliefs contained in my speech in my private petitions illogical.

“The doctrine that a government, state or federal, may not grant a benefit or privilege on conditions requiring the recipient to relinquish his constitutional rights is now well established.” *Citing, Jones v. Board of Education*, 397 U.S. 31, 34 (1970); (internal quotes omitted) Nor may the government “prohibit any kind of expression because it does not like what is being said.” *Id.* at 35-36.

The United States Supreme Court in *Kennedy v. Bremerton School Dist.*, No. 21-418, at *15 (June 27, 2022) held, “Where the Free Exercise Clause protects religious exercises, whether communicative or not, the Free Speech Clause provides overlapping protection for expressive religious activities.”

In that case, the Court granted a professional coach the right to exercise private religious belief and speech, indicating the state’s punishment violated the Coach’s first Amendment right applicable to the state pursuant to the 14th Amendment, despite his association as a government employee or agent.

This case must be extended to me to prevent the state, federal government and additional governments’ including Judge Diamond of the Eastern District Court of PA punishment of me, but for the exercise of my exercise of my religious belief, as outlined in my speech in my

petitions, no matter how repugnant or illogical my religious beliefs appear to the state and Federal government.

My private religious beliefs may not be deemed a disability preventing me from buying and selling but for my religious beliefs, nor may the petitions I submitted in good faith to assert my 1st Amendment right to access to the courts via the 5th and 14th amendments without insidious disparate denial based on religious-political or poverty animus

There is no legitimate interest in restraining my license to practice law to 1. conceal government violations of the law or to punish me for the exercise of Constitutionally protected rights. This Supreme Court held in *Illinois Elections Bd. v. Socialist Workers Party*, 440 U.S. 173, 185 (1979) held, “even when pursuing a legitimate interest, a State may not choose means that unnecessarily restrict constitutionally protected liberty,” *Kusper v. Pontikes*, 414 U.S. 51, 58-59 (1973), and we have required that States adopt the least drastic means to achieve their ends. *Lubin v. Panish*, *supra*, at 716; *Williams v. Rhodes*, *supra*, at 31-33.”

Infringing upon Constitutional liberties to cover up state misconduct to protect the deceptive appearance of the Court by covering up its actual infringement on my asserted constitutional rights is not a legitimate state interest, and even if it was it unnecessarily violated my Constitutional rights, without considering the least restrictive means.

The freedom to associate as a professional with a license to buy and sell must not eliminate every other individual Constitutional liberty by government backed compelled force to gain the necessities of life including but not limited to Equal Protections, Notice, opportunity to be heard, fair proceeding, and other Due Process, First Amendment rights to speech, petition, access to courts, belief, and exercise of belief, 6th Amendment right to cross examine witnesses, and other liberties.

The doctrine forbidding unbridled discretion was violated. The decision makers rely upon no more than their purely subjective ideas of public welfare, peace, safety, health, decency, good order, morals or ethics. *See Shuttlesworth v. City of Birmingham*, 394 U.S. 147 (1969).

The US Supreme Court held in *Gentile v. State Bar of Nevada*, 501 U.S. 1030, 1054 (1991)

“At the very least, our cases recognize that disciplinary rules governing the legal profession cannot punish activity protected by the First Amendment, and that First Amendment protection survives even when the attorney violates a disciplinary rule he swore to obey when admitted to the practice of law.....We have not in recent years accepted our colleagues' apparent theory that the practice of law brings with it comprehensive restrictions, or that we will defer to professional bodies when those restrictions impinge upon First Amendment freedoms.”

The restrictions on my license to practice law must not be deferred to in this case because the reason to punish me violates the Constitutional rule of law which protects my exercise of First Amendment rights applicable to the state via the 14th and the federal government via the 5th without favoritism to the courts and government especially when the courts itself through its members and staff violate the law and punish me to cover up and conceal lawlessness by the judiciary under the deception of upholding the impartial rule of law.

The Court's staff prevented service to local counsel and misled me in hopes I would miss the filing deadline based on religious-political associations. The Court then sent its agents to attack me to cause me to forgo my petitions. I petitioned the court to prevent further infringement of my asserted 1st Amendment right to access to the courts applicable to the state via the 14th Amendment. The Court then secretly sealed my petitions regarding insidious disparate treatment by the Court in deprivation to my access to the courts during *Kelly v Trump* without providing me with notice or an opportunity to be heard. Then, the Court fired two staff during the RFRA lawsuit or days after I filed the civil rights suit to conceal their testimony and

to cover up instead of correct them to improve and uphold the administration of Justice. I was denied 14th Amendment procedural due process in DE case and the DE disciplinary proceeding which occurred after I filed the civil rights suit as I describe in more detail below. The Court prevented me from cross examining my accusers by denying my motions to call them. US Amend 6, XIV. The State concealed evidence in my favor and fired two court staff by forcing them into retirement to conceal their testimony in my favor. In *Greene v. McElroy*, 360 U.S. 474, 475 (1959), this US Supreme Court held, “this court will not hold that a person may be deprived of the right to follow his chosen profession without full hearings where accusers may be confronted and cross-examined” Therefore the denial of my asserted 6th Amendment right to cross examine Arline Simmons a Chancery Court staff was a structural error in the originating DE disciplinary proceeding.

The Delaware Supreme Court members concealment of the Court’s misconduct by concealing evidence material and necessary to my case is not a **legitimate purpose** narrowly tailored to meet a government purpose. Colluding to fix the partial, unfair sham disciplinary proceeding to punish me for my protected private religious beliefs contained in my speech violates the First Amendment, 14th Amendment Due process and my Equal protections under the law as a party of one, based on religious-political animus ⁷ Then the state brought a disciplinary proceeding against me after I filed a civil rights law suit for the state’s violations of my Constitutional rights and other claims related to *Kelly v Trump* to defame my name and

⁷ See, *In re Hey*, 192 W. Va. 221, 227-28 (W. Va. 1994) (“It is the same approach we have taken in considering the impact of disciplinary rules on lawyers’ speech. See *Committee on Legal Ethics v. Douglas*, 179 W. Va. 490, 497, 370 S.E.2d 325, 332 (1988) (“the Free Speech Clause of the First Amendment protects a lawyer’s criticism of the legal system and its judges, but this protection is not absolute”); *Pushinsky v. Board of Law Examiners*, 164 W. Va. 736, 266 S.E.2d 444 (1980) (Bar admission process may not inquire into an applicant’s beliefs, advocacy, or associational activities). That is: the State may accomplish its legitimate interests and restrain the public expression of its judges through narrowly tailored limitations where those interests outweigh the judges’ free speech interests.”)

credibility to cover up the State Court's own misconduct. The state denied me the asserted right to call one of the fired staff as a witnesses and other asserted and not waived rights as discussed below.

I believe collectively we can do no good by conditionally compelled caring. I believe only individually do we have the power to do any good by unconditional love. While the freedom to associate is protected under the 1st Amendment applicable to the states via the 14th Amendment. All other freedoms should not be eliminated by associations or the individual liberty of speech, belief, exercise of belief and petition are not protected in exchange to buy and sell as an associated professional.

III. DE Court's violated my 1st Amendment right to access to the Courts applicable to the state pursuant to the 14th Amendment to prevent petitioning to require the courts adhere to the law to cover up the courts' mistakes or misconduct, then sealed my petitions A-4, A-5 in secret without notice or opportunity to be heard and fired two court staff to prevent testimony incriminating the courts

This reciprocal case arises based on my petitions in *Kelly v Trump* to the Chancery Court and the Delaware Supreme Court to correct judicial misconduct or mistakes. I petitioned the Chancery Court to stop its staff from disparately treating me based on disdain for my religious-political beliefs or poverty. The staff wrote on a subpoena, dated 10/5/20 confusing the court and I, and directed me to cross off local counsel's address on a subpoena for an amended complaint dated 10/12/20 to prevent service to local counsel. Then the staff member misled me to cause me to miss an appeal date. (App. Letter dated 4/26/22 letter and attachments thereto); See, *Isaacs v. Caldwell*, 530 S.W.3d 449, 455 (Ky. 2017) ("Nothing in the civil rules or statutes governing the initiation of a civil action....permits the clerk to withhold issuance of the summons")

The Chancery Court would not accept any documents from me without notarized signature. Since Trump had covid at the time, I drafted a letter requesting relief from the notary requirements under the impression it may endanger my health, the court's health and the notaries who sign off on Trump's signature. The Delaware Supreme Court sent back a letter indicating the courts waived notary requirements for all during the pandemic. The DE Supreme Court copied the Disciplinary Board member in the letter, attached hereto, dated 10/21/20. Id.

Chancery Court and DE Supreme Court agents and members sought to impede and obstruct my access to the Courts in *Kelly v Trump*. The First Amendment prohibits state officials from retaliating against Claimants, such as myself, for exercising their right of access to the courts. "Retaliation by public officials against exercise of First Amendment rights is itself violation of the First Amendment." US. Amend. 1. *Zilich v. Longo*, 34 F.3d 359 (6th Cir. 1994).

The representatives at the Chancery Court demeaned me apparently based on poverty, association or religious beliefs. I petitioned Chancery Court Master Patricia Griffin for her help from disparate treatment. In addition, the DE Supreme Court through ODC impermissibly interfered with *Kelly v Trump* by contacting Judge Clark.

In mid-April, Judge Clark appeared to threaten me at BJ's, a store, located in Millsboro, Delaware, as if I was on trial for standing up for my faith in Jesus, solely based on my exercise of seeking relief in court based upon alleviating the government sponsored burden the establishment of government-religion Trump created upon my free exercise of religion. The ODC and Judge Clark clearly violated my right to access to the courts to defend my religious beliefs and exercise of belief, by seeking to use their government power to obstruct my case, showing partiality to the Defendant, the President of the United States. "Supreme Court's two-step Saucier analysis governs whether a government official is entitled to qualified immunity,

considering: (1) whether the facts alleged by the plaintiff show the violation of a constitutional right, and (2) whether the right at issue was clearly established at the time of the alleged misconduct.” *Werkheiser v. Pocono Twp.*, 780 F.3d 172 (3d Cir. 2015).

Judge Clark and the State knew or should have known that seeking to use the cloak of government authority, as a respected, fair judge, to chill or condemn or interfere with my ability to bring this case without government retaliation or pressure violates My 1st amendment right to petition, speech, religious belief, association, and exercise of belief. My right to a fair, unobstructed trial to alleviate a substantial burden upon my free exercise of religion is a constitutional right. I was 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. I am permitted to believe differently than the government through its agents, even if what Jesus teaches seems foolish to the world. 1 *Corinthians* 1:18, 2:14-16. Id.

“Government official's conduct violates “clearly established” law, so that the official is not entitled to qualified immunity, when, at the time of the challenged conduct, the contours of a right are sufficiently clear that every reasonable official would have understood that what he is doing violates that right.” Id. I desired fair access to the courts, without government persecution based on my exercise of redressing a grievance to alleviate the burden upon my free exercise of religion from Government sponsored religious persecution directly caused by government establishment of government-religion and government-religious views. I objected to disparate treatment based on religious affiliation, and reserved the issue for appeal on due process, first amendment and equal protection grounds in the civil rights case. Id.

During *Kelly v Trump* I received a threatening letter from DE-Lapp with information only the DE Supreme Court was privy to. (3DI 56 at A-4, A-5) I later realized it was the DE

Supreme Court who participated and caused the attacks. The Court copied the Board in a letter in response to a waiver of notary requirements. (Civil rights case DI 58 in 21-3198, prior to Chief Judge Colm F. Connelly's Order, attached hereto Letter 4/26). In addition, only the Supreme Court and Disciplinary counsel's uncle knew of my requests for exemptions from bar fees. I received 2 more letters from DE-ODC, for a total of three threatening letters prior to my petition in *Kelly v Trump* was denied at USSC. I filed my civil rights law suit before the Delaware Disciplinary proceeding began. (3DI 56 at A-5) After the civil case started, the USSC rejected my petition in *Kelly v Trump*. It was weeks later the Delaware Disciplinary proceeding initiated.

During the State disciplinary case suit additional violations of my Constitutional rights, federal law and common law arose, compelling me to move more than thrice to amend my complaint with no grant. Per the Brief, Reargument and State reply, I placed on the record below and attach hereto at App. 3DI56 additional facts, legal claims arose or were discovered since I initiated the civil rights case.

During *Kelly v Trump* the Delaware Supreme Court incited the Delaware Disciplinary Counsel, DE-Lapp another arm of the Court and Court of Common Pleas Judge Kenneth S. Clark to attack me to cause me to forgo my case. Judge Clark threatened me in a store BJ's in an attempt to cause me to forgo my case *Kelly v Trump*.

I petitioned the Delaware Supreme Court regarding the state attacks to cause me to forgo my 1st Amendment right to petition, I attach hereto as A-4. I discovered Judge Seitz incited the petition. So, I moved for his recusal as outlined in the attached exhibit A-5.

After *Kelly v Trump* was over I discovered the entire Court incited the state attacks against me. I also discovered the Delaware Supreme Court through staff attorney Robinson fired

the Court staff I complained about, and secretly sealed A-4 and A-5 during *Kelly v Trump* to conceal incriminating information against the Delaware supreme Court and necessary for my claims and defense in all lawsuits relating to this matter. I care about the staff. I did not want them to get punished. I merely sought to preserve my right to religious exercise of beliefs. After the case I noticed the DE Supreme Court did incite the attacks by copying the Disciplinary Board in a letter dated 10/2/20 attached to the 4/26/22 letter as an Exhibit hereto.

I was denied access to the Delaware Courts in *Kelly v Trump* in contravention of the 1st Amendment applicable to the states pursuant to the 14th Amendment. Delaware Judges and federal judges should be corrected within the purview of the Constitutional limits of a 1. A case or controversy or impeachment without waiver, and must uphold and not chill the check placed on the judiciary through parties petitioning to correct Court's staff misconduct or mistakes by vindictive punishment but for requiring the Court uphold the rule of law as opposed to partial whims.

IV. Judges should be corrected within the purview of the Constitutional limits of a 1. A case or controversy or 2. impeachment without waiver, and must uphold and not chill the check placed on the judiciary through parties petitioning to correct Court's staff misconduct or mistakes by vindictive punishment but for requiring the Court uphold the rule of law as opposed to partial whims

This reciprocal case arises based on my petitions in *Kelly v Trump* to the Delaware Chancery Court and the Delaware Supreme Court to correct judicial misconduct or mistakes, and to safeguard my exercise of religious beliefs substantially burdened by President Trump by the establishment of government religion exhibited by a course of conduct including but not limited to the passage and enforcement of certain executive orders.

If this US Supreme Court determines the DE State Court may not violate the Constitution by chilling the Constitutional check upon itself by vindictively punishing me for petitioning to

correct, not destroy the court to preserve Constitutional rights and claims based on the perceived Court agents' religious-political poverty animus than the basis for the reciprocal Order is eliminated. And this Court must overturn the District-Court Order infringing on my license. Otherwise the Courts do not uphold the Constitution by favoring justices' personal interest in marketing their work and preserving their pay by preserving their government positions in violation of the Equal Protections Clause and the rule of law, especially in my case where the State Court sealed the petitions to hide its misconduct on appeal to this court in *Kelly v Trump*, 21-5522.

Allowing the Constitutional check upon the Court in a case and controversy upholds justice and proves the Courts and justices are not above the law, but are bound to the Constitutional application of the rule of law without bias and favoritism to the personal interest of judges in marketing themselves and maintaining their personal pay in violation of the 5th Amendment Equal Protections component.

Since the Constitution applies to the Courts, Appellee and the DE State Court must not chill claimants, specifically me, for asserting my rights from infringement by the court to serve personal egos or material gain. *Salazar v. Buono*, 559 U.S. 700 (2010)

The deception that an ethics code or regulating US Supreme Court justices would uphold the Constitution by granting fair access will eliminate the Constitutional protections of claimants and allow for the elimination of the courts and permit the overthrow of the government down the line. These proposed disciplinary and ethics rules make the courts unfair since the rules focus is not on justice but preserving the deceptive fickle appearance of the courts and judges' positions for pay not freedoms which are not for sale, affording even judges limited Constitutional freedoms too. Judges merely may not violate the Constitution in asserting their individual

liberties. Should judges violate the Constitutional restraints and checks built into the Constitution, the Court must not violate the Constitution further by removing the check created to protect me and the people in a case and controversy either by retaliation against me and creating attacks by outside court agents such as Court of Common Pleas Judge Kenneth S. Clark who threatened me in a grocery store but for not only my religious beliefs contained in my petitions but for my exercise of the First Amendment right to petition the court to correct misconducts and mistakes or seeking an impartial forum to uphold the Constitution in the face of clear violations of the Constitution and the rule of law based on malicious intent of religious-political-and poverty animus.

I also assert even judges be allowed to make mistakes with the limit that they be corrected under Article III by appeals which includes cases and controversies or distinguished cases where parties and advocates may in good faith show how the courts erred as applied or per se. Should the parties fail, the courts may reconfirm with sound mind the position based on justice not ease or convenience. Judges are not held to perfection as God. Allowing mistakes without reprisal in the form of self-discipline or third party discipline affords judges the unobstructive authority to courageously do what is right instead of allowing professionals, science and experts to be above court correction by favoritism to marketing and making money while sacrificing the Constitutional rights and claims of those we serve by deference to professional boards including judicial and attorney boards.

Moreover attorney discipline and judicial disciplinary proceedings lack a case and controversy and are repugnant to the fair norms of an impartial judiciary since attacks may be based on lies, or deceptive appearance by third parties who secretly or wrongly openly complain as Senator Whitehouse did with an agenda to bend the law to their bias as opposed to the

impartial application of the Constitution to the rule of law in violation of the 5th Amendment Equal protections component towards me as a party of one and others. Upholding impartial justice in the courts is a religious command by my God, and coincidentally is also required by the constitution to protect my right as a party of one for an impartial fair forum. See, *US Amend* I, V, XIII, XIV; *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"); *Exodus* 23:6, ("You shall not deny justice to the poor in their lawsuits."); *Deuteronomy* 16:19, ("Do not deny justice or show partiality. Do not accept any bribes, for a bribe blinds the eyes of the wise and twists the words of the righteous "); *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."); *James* 2:1, ("do not show favoritism."); *James* 2:9, ("But if you show favoritism, you sin and are convicted by the law as transgressors."); *Proverbs* 18:5, ("Showing partiality to the wicked is not good, nor is depriving the innocent of justice."); *Proverbs* 24:23, ("These also are sayings of the wise: To show partiality in judgment is not good."); *Malachi* 2:9, ("So I in turn have made you despised and humiliated before all the people, because you have not kept My ways, but have shown partiality in matters of the law."); *Job* 34:19, ("who shows no partiality to princes and does not favor the rich over the poor, for they are all the work of his hands?"); *Job* 13:10, ("Surely He would rebuke you if you secretly showed partiality.").

As applied the Attorney disciplinary proceedings and judicial disciplinary proceedings violate my 5th and 14th Amendment right to a fair proceeding and procedural due process as applied, since the judges fear reprisal and violate laws I assert for my protection to cover up misconduct out of fear of sanctions.

Moreover the attorney disciplinary proceeding and judicial disciplinary proceedings violate equal protections as applied to me as a party of one by tempting judges to be partial towards profit, positions and productivity which serve their private individual interest instead of the supreme preempting Constitution to the application of the rule of law. US Amend I, V, XIII.

The Court must make a decision in a case and controversy, even if it should disagree with my position. That way the Court says what the law is not bureaucrats who have partial interest. This issue may not be in your hands if you do not courageously look at yourself and your staff to care for and correct and protect your positions by humbly allowing Art III cases brought in good faith.

On 10/19/23, Congress announced its intent to take action in a committee to subpoena witnesses to attack Justice Thomas and this Court by compelling regulations that will endanger this Court and the impartiality it requires to uphold and not violate the parties it serves in discerning the rule of law in each case. Congress has taken concrete steps towards attacking the integrity of this US Supreme Court and its justices without a case or controversy or impeachment to pressure the court to become partial towards those who misuse ethics code or regulations to force their will and fix their cases by eliminating judges by threats or stealth.

I strongly oppose the inappropriate personal **publicly made** attacks by government agents in other branches including Senator Whitehouse's complaints and threats of sanctions or implicit threat of impeachment against US Supreme Court Judges and those who may be subpoenaed without a case or controversy in a judicial Article III forum, where any incriminating information will be used to impeach or control a no longer free or independent judiciary.

Arguably every case this Supreme Court decides affects each of us personally and individually with benefits and detriments with each new opinion. Does that mean there is a

conflict of interest depriving claimants of a fair proceeding under the 5th Amendment procedural Due Process component Does that mean justices should live in a box and not associate with loved ones, friends, or the public it serves. Thus, must we imprison the ones who are charged with safeguarding our freedom in our Democratic Republic. I think not. It is sufficient that claimants may assert violations of their right to a case or controversy in an actual proceeding without additional threats of sanctions by a disciplinary code to preserve justice and the courts by improvement not destruction.

Congress's improper attacks against Justice Thomas and the integrity of the court by subpoenaing witnesses to be used against Justice Thomas and the Court places the rule of law in danger by reign like mobsters by Congressional and also Executive threats to justices to serve the lobbyists (not the people) to serve themselves and their seats. Congress and the President make a mockery of the profession. I chose to serve God as an exercise of my religious belief by upholding by requiring impartiality in the courts, not the lawless vanity of men in high ranking positions of power like misguided congress people. *Matthew 23:23, Amos 5:15, US Amend. I*

The Courts are in danger of having no effect in a scheme to eliminate the courts to eliminate the laws to restrain those who control the resources from controlling to eliminate the government including these United States. I seek to preserve the Courts not destroy them when I petition to correct judges or staff within them. I seek to preserve my rights and the rights of others to buy and sell which should not be eliminated but for their religious belief in Jesus as God, not money as God or for some other Constitutionally asserted rights.

V. The Court must find US Supreme Court may only be disciplined or checked within the purview of the Constitutional limits of 1. a case and Controversy under Art. III, and 2. by impeachment, without waiver 1. to preserve my right, as a party of one, and other claimants right under the 5th Amendment Equal protections component and procedural Due Process component to an impartial forum not partial towards an ethics code or towards regulations to maintain justices' seats but partial towards upholding the

Constitutional rule of law as applied to cases, and 2. Courts must not violate the Constitution by impeding and chilling the checks upon its own branch via punishing me in terms of petitioning this Court concerning denial of access to the courts by appellant, itself, and the original disciplinary forums to uphold the Constitutional law and improve the administration of justice not destroy the courts or individual judges.

In 2018 I ran for local DE office because non lawyers were practicing real estate law without an attorney license messing up the chain of title and harming the public while taking advantage of attorneys including my esteemed deceased friend Dick Goll, Esq.

In 2018, I learned lobbyists schemed to reduce to eliminate people lawyers and people judges which are required to protect individual liberties who do not conform to the majorities through standardized algorithms, like my unusual exercise of religious beliefs in Jesus which do not conform to any churches, though I associate with a religion and church. I place my faith in God not in man as commanded by the bible.⁸

I believe one way to prevent the schemed intentional overthrow of the government is to protect the courts from elimination by limiting correcting judges to 1. Cases and controversies and 2 impeachment without waiver to safeguard my 5th Amendment right to an impartial forum as I argued in my motions to recuse Scirica and Phipps below, as a party of one as applied. I have Constitutional and religious objections to attorney and judicial regulation that I provided in part on the docket below and more heavily in the civil rights case, albeit I do not have much space to plead it.

This US Supreme Court must hold that its members and the members the federal judiciary may only be disciplined or checked within the purview of the Constitutional limits of 1. a case and Controversy under Art. III, and 2. by impeachment, without waiver to preserve my

⁸ See attached, 108th Affidavit, and attached Exhibits to eliminate people in the law

right and other claimants right under the 5th Amendment Equal protections component and procedural Due Process component to an impartial forum not partial towards an ethics code or towards regulations to maintain justices' seats but partial towards upholding the Constitutional rule of law as applied to cases, without waiver of individual justices' 5th Amendment right against self-incrimination so as not to be set up to eliminate judges schemed to fall by people who will lie to win, (especially Justice Kavanaugh who had 83 complaints against him made public in the 10th Circuit); and, relating to activity that will punish judges ex post facto since all lawyer and judge disciplinary rules have no statute of limitations in any state or federal court in this nation that I am aware of.

Neither this United States Supreme Court nor the Eastern District of PA Court below may violate the Constitution by impeding and chilling the checks upon its own branch via punishing me in terms of petitioning this Court concerning denial of access to the courts by appellee, itself, and the original disciplinary forums to uphold the Constitutional law and improve the administration of justice not destroy the courts or individual judges by petitioning the Court for its agents' violations of my 1st Amendment rights to petition, religious belief, exercise of belief, speech, and association applicable to the state via the 14th Amendment, Equal protections and Due process via the 14th and 5th Amendments and other claims, including claims outlined in part in A-4 and A-5 contained on the docket and placing my license on inactive disabled but for the exercise of my rights outlined in a. See also Article 1 Section 9 and Article 1 Section 10.

I also realized more clearly now lawyers should not self-correct because lawyers' profit when laws harm the public or violate constitutional rights because that brings them business. We are the representation of the public in cases. Yet, we have conflict of interest in that we work for money, and clients' rights are not for sale. They become for sale when lawyers are blinded by

their desire for money and their training that they do not see clearly how some laws and practices violate the rights of those they represent. This blindness and dumbness Jesus the Christ speaks of dumbed down by desire, standardized training, education or experience is what I believe is the mark of the beast by those not saved by their desires and death in hell by learning to repent by unhardening their heads and hearts to lay down their desires by doing what is right, not what is profitable, convenient or productive. Sacrificing the lives, liberty, and health of others for material gain even knowledge under the pretty word, science, expert, professional, public interest, or common good is the common bad when convenience and the selfish desire for profit eliminates rights the Constitution demands we protect and do not infringe. I desire judges judge without threat to their seats outside the purview of the Constitution's clear limits.

Per the attached Meghan Kelly's waiver of a speedy trial not filed, but drafted during the Delaware Disciplinary proceeding incorporate herein by reference I note conflicts that harm the public by attorney self-regulation under the lie more bad work is better when it is more harm to the public.

The disciplinary proceedings violate Art III and separation of powers by allowing the professionals partiality towards self in Board proceedings in lawyer, dentistry, healthcare and other matters, which harm the public for selfish marketing to make money and sustain the positions or partial favor of those serving on boards.

VI. Collateral Estoppel does not apply, US Supreme court staff's delay in docketing an interim stay of civil rights case prevented appeal of original DE Order despite asserted 1st and 5th Amendment rights to fair access to the courts to prevent foreseeable deprivation of my access to the courts and the underlying fundamental rights I sought to defend, assert and preserve and no willfully lose.

I have additional religious and Constitutional objections to certain Delaware Disciplinary rules and the federal disciplinary rules and judicial rules authored by Chairperson 3rd Circuit Appellate Judge Scirica and Constitutional arguments against lawyer disciplinary proceedings

and disciplinary proceedings against federal judges too that I am preventing from asserting at this time, and yet I and the public have an important interest in maintaining fair impartial courts not controlled by partial selfish interests that inhibit their ability to uphold the impartial Constitutional application to the rule of law.

I sought to assert some of these claims in the DE original disciplinary proceeding and the PA Office of Disciplinary case before this court, but this Court's staff deprived me access to the courts in contravention of the 1st and 5th Amendments, I outline in the attached Appendix L, *Petitioner Meghan Kelly's Petition for a rehearing on the 11/13/23 order denying petition for a rehearing submitted 10/18/23, denied on 11/13/23 to consider intervening causes of substantial or controlling effect concerning my arguments and other claims not previously considered which will vitiate my rights should the court not hear this rehearing in US Supreme Court case No.22-7695, Related Application No. 22A981, Meghan M. Kelly, Petitioner V Office of Disciplinary counsel, aka Pennsylvania Disciplinary Counsel On Petition for Writ of Certiorari to the Supreme Court of Pennsylvania, Western District of PA, Case Number 2913 DD3, Exhibits to Appendix L, 19th Affidavit, 26th Affidavit, 77th Affidavit, 116th Affidavit, 124th Affidavit, 127th Affidavit, and 133rd affidavit I incorporate in their entirety by reference and attachment hereto.*

A. US Supreme Court staff deprived me of access to the courts to appeal the original disciplinary matter by delays in. This Court deprived me of access to the courts in related cases which affect this case and my ability to petition effectively and fairly US Amend I, V

I was denied access to the United States Supreme Court to appeal the original DE Disciplinary Order by delays by US Supreme Court in docketing my application for an interim stay to Justice Jackson in the related civil rights case by more than two weeks See US Supreme Court Case No. ("No."), No. 22A747, note the date 15 days later was not noted on the docket wherein the court started to make notations in another matter, also see No 22A981 (regarding

application to assert US Amend I, V, VI amendment right to a full, fair and public proceeding and record in these criminal like proceedings for exhibits not docketed, that Robert Meek appeared to remedy after the fact. Please note the notation of an alleged order shown on the docket was not visible at the time I filed and mailed the request for emergency relief. So the date of the order is suspect. Another claimant similarly situated alleged the same event happened to her to deprive her of access based on viewpoint of the petitions, to correct mis filings or errors of the US Supreme Court staff, which this court held in case law is permissible pleadings to file for the judge not the staff to consider)

I timely filed a resubmission of Justice Alito's denied application for an interim stay. The staff at the US Supreme Court delayed in docketing despite calls and emails concerning the irreparable injury I face in terms of loss of not only the 1st Amendment right to access to courts in other cases, including the original disciplinary case, but the underlying rights I sought to preserve and not lose, including but not limited to the 1st Amendment right to religious belief, exercise of belief, affiliation, speech and petition, 6th Amendment right to cross examine accusers, 6th Amendment right to self-represent, Equal Protections pursuant to the 5th and 14th, Amendments protections of Procedural Due Process, notice, opportunity to prepare and present my case and other norms that were violated in my original DE disciplinary proceeding. (19th, 26th, 77th, 127th and 133rd Affidavit)

In Case No. 22A747, I filed an application for resubmission of Justice Alito's rejected application of an interim stay to Justice Jackson on March 13, 2023. No one at the court confirmed receipt despite contacting the emergency clerk, Robert Meek without delay to expedite this important imperative matter. On March 21, 2023 I sent another application to Justice Jackson. It was not **until 15 days** later on or about March 28, 2023 that the original

pleading was docketed and the second one was rejected, and wrongly removed from the docket despite Danny Bickle indicating the staff would contact me if they had both to see which they should file. I indicate the later.

The Third Circuit in bad faith expedited consideration of my appeal knowing I asserted I needed time in order not to deprive me of access to the courts in other cases.

On April 1, 2023, I realized the US Supreme Court would not grant relief until it was too late. I filed a Motion to withdraw my petition and application for an interim stay with the Honorable Justice Jackson. I required a stay from the proceeding below to afford me time and resources to fight, not merely file the Delaware Disciplinary appeal. The Delaware Disciplinary appeal was due by or before April 8, 2023 with this Honorable Court. The US Supreme Court was not even scheduled to convene until April 13, 2023 to review the petition before judgment. April 13, 2023 is after the Delaware Disciplinary due date, and is after the Third Circuit's conference dated April 11, 2023. April 13, 2023 was too late for this Court to grant me relief.

I was denied access to petition this Court in another case, the Delaware Disciplinary law suit, due to the delays in the United States Supreme Court's docketing or the grant or denial of my appeal and the application for an interim stay pending this United States Supreme Court's final determination. US Amend I, V.

The Third Circuit's denial by Judge Phipp's of my requests for accommodations in the form of time or a stay in the Civil rights case to safeguard my access to other courts including the First Amendment right to petition the Delaware Disciplinary petition also substantially burdened my access to other courts so as to deny me the First Amendment right to petition the Delaware Disciplinary case too. 3DI 56

I filed documents in good faith requesting emergency relief to expedite the case before the United States Supreme Court. The United States Supreme Court did not docket or respond to my petitions in an emergency expedited manner as I hoped.

B. US Supreme Court staff tampered with and removed exhibits necessary for a full and fair opportunity to be heard with regards to my application for an interim stay and petition for a stay in the civil rights case which deprived me of foreseeable access to other courts since I petitioned for a stay to prevent such an actual deprivation to preserve the underlying fundamental rights not merely my interest in my licenses

The US Supreme Court staff tampered with my filings relating to the interim stay in the Civil rights case depriving me of a full and fair opportunity to be heard as a party of one in violation of the 5th amendment Equal protections component in the exercise of my First Amendment rights in the interim civil rights appeal.

The staff at the US Supreme Court removed my submitted documents as shown in the 133rd Affidavit at Exhibit 5 Email to the court dated 12/9/23 and attachments thereto showing removed items in my pleading submitted 3/3/23 in an emergency application to Justice Alito to expedite consideration of an application in Kelly v Swartz for an interim stay pending the US Supreme court's decision on a stay, et. al, Case Number 22-6783. The first exhibit 1 shows the pleadings as I filed them in papers and electronically. The second docket page at Exhibit 2 shows 6 items removed. The third docket page at Exhibit 3 shows Clerk Meek appeared to make partial not complete adjustments in response to my request.

I submitted *Application to place exhibits back on the docket US Supreme Court Case No. 22-6783, Application No. 22A747, Kelly v Swartz et al, Appellant Plaintiff Meghan Kelly's Application to the Honorable Justice Alito to place removed exhibits back on the Docket to prevent the deprivation of her 5th Amendment Equal Protections and procedural due process*

right to a full and fair opportunity to be heard without selective, arbitrary, disparate, unfavorable treatment towards her as applied.

The US Supreme Court's staff's delays in docketing deprived me of my asserted 1st and 5th Amendment right to access this court fairly to appeal the original disciplinary matter I averred in the attached 19th, 26th, 77th so as to deprive me of the fair and full opportunity to be heard even before the current case in other courts and before the US Supreme Court in the first interim application and appeal of the civil rights case *Kelly v Swartz*, 21-3198.

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

“Congress, the Executive, and the Judiciary all have a duty to support and defend the Constitution.” *Salazar v. Buono*, 559 U.S. 700 (2010)

“There is no ‘de minimis’ defense to a First Amendment violation.” *Doe v. Indian River Sch. Dist.*, 653 F.3d 256, 259, (3d Cir. 2011), *Citing, Elrod v. Burns*, 427 U.S. 347, 374, (1976) (“The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.”); *see also Abington School Dist. v. Schempp*, 374 U.S. 203, 225 (1963) (“[I]t is no defense to urge that the religious practices here may be relatively minor encroachments on the First Amendment.”).

The delay in docketing vitiated my right to access to the court to petition the original disciplinary case by making relief moot.

“The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.” *Mullin v. Sussex County*, 861 F. Supp. 2d 411, 415, 2012 U.S. Dist. LEXIS 67571, *1

I went to the courts to alleviate a substantial government incited burden against me that caused physical, social and economic threats against me including people who talked about shooting me which I reported to the police though they did not create a report, throwing things at my car and other threats. The Court increased and caused additional religious economic persecution instead of alleviating it based on disdain for my religious belief in Jesus.

“Government official's conduct violates “clearly established” law, so that the official is not entitled to qualified immunity, when, at the time of the challenged conduct, the contours of a right are sufficiently clear that every reasonable official would have understood that what he is doing violates that right.” *Werkheiser v. Pocono Twp.*, 780 F.3d 172 (3d Cir. 2015), (explaining Supreme Court's two-step Saucier test)]

Court violations of my 1st Amendment rights to religious beliefs, exercise of belief, petitions, speech and association applicable to the Courts via the 14th Amendment clearly violates law.

The US Supreme Court's delays in docketing in the civil rights Interim application for a stay vitiated my access to the courts and deprived me of the 1st Amendment right to petition to appeal to void the original disciplinary case due to procedural due process violations.⁹

I was deprived of the 1st and 5th Amendment right to petition fully and fairly before the US Supreme Court by the editing and removal of my petitions by removing parts of them per the

⁹ See, *Stokes v. Delo*, 495 U.S. 320, 323 (1990) (“Delay or default by courts in the federal system must not be allowed to deprive parties...of the lawful process to which they are entitled. It is the duty of the courts...to adopt and follow procedures which ensure all parties expeditious determinations with respect to any request for a stay. Prompt review and determination is necessary to enable criminal processes to operate without undue interference from the federal courts, and to assure the proper functioning of the federal habeas procedure.”)

attached Exhibits I incorporate herein by reference 133rd Affidavit at Exhibit 5. Per an email the court indicated it was a glitch.

However, I discovered the staff at the US Supreme Court denied access to another lawyer based on viewpoint of speech in her petitions same as me per the attached 127th Affidavit I incorporate herein by reference in its entirety.

The US Supreme Court's staff deprived me of access to the courts in the PA Case, and the staff made judicial decisions which are left to the judges in error which caused irreparable injury in term of the loss of my fundamental rights not merely an infringement on my retired PA license

C. The US Supreme Court staff erred in denying me access to the courts, making judicial decisions and delaying in docketing and for not accepting or rejecting a timely filed Supplemental Brief necessary for consideration of a petition for a rehearing with reasons for rejection and opportunity to cure per case law should the court have rejected it in deprivation of my 1st, 5th and 6th Amendment asserted and not waived rights and deprivation of the opportunity to alert this US Supreme Court of a threat to the judiciary, the rule of law and the country

This US Supreme Court violated my 1st and 5th Amendments by denying me fair access to the courts again in another case, in a different case, Kelly v PA ODC, Case No. 22-7695.

On October 18, 2023, I filed a petition for rehearing in 22-7695.

The Court scheduled a conference to consider the rehearing on 11/9/23.

On November 6, 2023, I submitted *Petitioner Meghan M. Kelly's Supplemental Brief to provide additional information not previously available on how private partnerships with the UN is schemed to be used to eliminate judicial authority in open and by stealth, Petitioner's belief the courts are in danger especially with the debt ceiling approaching November 17, 2023 with no agreement to date, and the convening of Congress October 19, 2023 to attack Justice Thomas and the integrity of the court by subpoenaing witnesses to be used against Justice Thomas and*

the Court in *Meghan M. Kelly v Pennsylvania Disciplinary Counsel*, No. 22-7695 by hand delivering 11 boxes containing a Supplemental brief containing new and additional other grounds to overturn the PA Supreme Court Order, which previously could not have been asserted. (“Supplemental Brief”) (116th-Aff)

I also sent Clerk Robert Meek electronic versions of the Supplemental Brief via email on November 7, 2023, with an email on November 6, 2023 indicating I requested emergency immediate relief and was driving up to hand deliver the supplemental brief.

I averred material circumstances of substantial and controlling effect to the Petition No. 22-7695 that arose after the 10/18/23 submission of the petition for a rehearing in the 11/6/23 Supplemental Brief that must be considered simultaneously with the petition for rehearing in accordance with Supreme Court Rule 25.6 in order not to deprive me of the 1st Amendment right to petition and the 5th Amendment full and fair opportunity to be heard before vitiation of my fundamental rights and property interest in my retired PA license to practice law in deprivation of procedural due process. US Amend I, V. Should the court reject my good faith submission of the 11/6/23 Supplemental Brief, the US Supreme Court requires the clerk to provide me a letter noting a delinquency with time to correct any flaw, per *Becker v. Montgomery*, 532 U.S. 757, 767 (2001), given I filed the supplemental brief in good faith. That did not happen. I was denied access to the courts in submission of the supplemental brief. See, *Borough of Duryea v. Guarnieri*, 564 U.S. 379, 387 (2011) (“[T]he right of access to courts for redress of wrongs is an aspect of the First Amendment right to petition the government.”).

Since I filed a petition for a rehearing on 10/18/2023, I reasonably thought a supplemental brief as opposed to another petition for a rehearing was an appropriate means to

include material information necessary for this Court's determination at the conference since Rule 25.6 provides:

“A party wishing to present ...other intervening matter that was not available in time to be included in a brief may file... a supplemental brief, restricted to such new matter and otherwise presented in conformity with these Rules, up to the time the case is called for oral argument.

Nevertheless, the Court did not docket my Supplemental Brief despite timely filing it days before the submission with assurance by the police officer it would be filed prior to 11/9/23, per the docket sheet attached hereto. (116th Affidavit).

On 11/15/23, I filed an Emergency Application Emergency Application to reopen 22-7695 to consider Supplemental Brief filed 11/6/23 in order not to deprive me of 1st Amend right to petition fully & fairly in accordance w/5th Amend before eliminating 1st Amend rights to religious beliefs, other fundamental rights & license(s). The Court rejected this. (116th, 124th and 127th Affidavits)

On December 1, 2023 I filed a petition for rehearing of the November 13, 2023 order but misnamed it a Second Petition for a rehearing on the denial of the petition.

The Court rejected this and I had a day or two to draft something and file it with the US Supreme Court, which I did the attached pleading contained in App. L.

In the pleadings I strongly argue against regulating the US Supreme Court as violating my right to a fair not partial forum, biased towards regulators as opposed to the impartial application of the Constitution to the rule of law.

This delay in docketing prejudiced me and vitiated my First Amendment right to petition and 5th Amendment right to be heard fairly and fully. So, on November 15, 2023 I filed *Emergency Application to reopen 22-7695 to consider Supplemental Brief filed 11/6/23 in order*

not to deprive me of 1st Amend right to petition fully & fairly in accordance w/5th Amend before eliminating 1st Amend rights to religious beliefs & license.

The Court receive Application to Justice Alito to reopen the case on November 20, 2023 but returned it in error. In *Stokes v. Delo*, 495 U.S. 320, 323 (1990) this US Supreme Court held, “Delay or default by courts in the federal system must not be allowed to deprive parties, including States, of the lawful process to which they are entitled.”

Robert Meek indicated the application as returned due to lack of jurisdiction, a legal determination in conflict with prior US Supreme Court case law. .

The US Supreme Court held in *St. L. S.F.R.R. v. Spiller*, 275 U.S. 156 (1927), “Errors by court “due to mistake of the clerk **may be corrected after expiration of the term at which the judgment was entered.**” (“emphasis intended”)

Robert Meek indicated incorrectly this court did not have jurisdiction which is a determination which must be made by the Supreme Court justices not be clerks. See, *United States v. Finnell*, 185 U.S. 236, 249 (1902) (“The clerk is a ministerial officer, and, without statutory authority, can exercise no judicial functions. ”)

The US Supreme Court held in *Wetmore v. Karrick*, 205 U.S. 141, 142 (1907) “The judgment of dismissal of June 12, 1899, having been entered **improvidently through a mistake or oversight** as to an entry of record, the Massachusetts court **did not thereby lose jurisdiction**, and had the power to vacate the dismissal and restore the case to the docket after the term. The *Palmyra*, 12 Wheat. 1; *Alviso v. United States*, 6 Wall. 457. *Rice v. Railroad Co.*, 21 How. 82, distinguished. ” Also see, *Isaacs v. Caldwell*, 530 S.W.3d 449, 455 (Ky. 2017)

The US Supreme Court in *Wetmore v. Karrick*, 205 U.S. 141, 142 (1907), further held, “In almost every case in which the rule is laid down by this court that judgments cannot be

vacated after the term, **judgments of dismissal by mistake are excepted.**” See *Phillips v. Negley*, 117 U.S. 665 (1886) (“Final judgments at law cannot, by proceedings taken after the close of the term at which they were entered, be reversed or annulled for errors of fact or law by the court which rendered them; **except that clerical mistakes**, and such mistakes of fact not put in issue or passed upon as may be corrected by writ of error coram vobis (or on motion in place of that writ where such practice prevails), and a mistake in the dismissal of a cause, **may be corrected after that time:** ”); *Sibbald v. The United States*, 12 Pet. 488, 492, "no court can reverse or annul its own final decrees or judgments, for errors of fact or law, after the term in which they have been rendered, **unless for clerical mistakes**;" *Phillips v. Negley*, 117 U.S. 665, 674 (1886); *BANK OF KENTUCKY v. WISTAR ET AL* 28 U.S. 431 (1830) (Clerk and staff's clerical error allowed reform of judgment after the fact)

However, I am deprived of the First Amendment access to the courts when the courts do not docket colorable pleadings by mistake. I am prejudiced by an unfair deprivation of my fundamental rights outlined in the Supplemental Brief by denial of access to the courts. Accordingly, I sought to ask the Court to cure the defect on Friday December 1, 2023 by an in person filing but misnamed the pleading and the substance was not heard. Thus I filed a petition for a rehearing of the November 13, 2023 order timely submitted by a 4th drive to the US Supreme Court by submitting pleadings December 7, 2023, I attach in part in Exhibit L and the exhibits thereto, as well as Affidavits 77, 116, 124, 127 and 133 I attach hereto and incorporate herein in entirety.

The Court did not accept or reject my Supplemental brief in a timely fashion, nor did the court reject the Supplemental Brief by providing me with a letter or notice of the reason why it was rejected with opportunity to cure any defects in accordance to this court's past case law.

Instead a month and a half later the court noted on the electronic docket rejection, dated December 14, 2023. When I called for notice Case Manager Lisa Nesbitt indicated had no idea why it was rejected or who rejected it. She directed me to talk with Donald Baker, as she previously directed me to do. I previously called him in front of Peggy Naylor the law librarian on December 15, 2023, with the door at the court ajar so the Delaware bailiff may hear.

Donald Baker inappropriately indicated I seek relief from congress or the news people regarding my concerns when only the court may grant me relief. I asked Donald Baker for the letter outlining reasons why my supplemental brief was not timely docketed and why I was not afforded time to correct any alleged deficiencies. Donald Baker evaded answering my questions. He left me on hold, on and off again, read the docket as if to acknowledge he sought to cover up a mistake under the pretense he did not know what is going on.

After about an hour of wasting my time Donald Baker indicated I call Danny Bickle. I told him I already previously did, and Danny Bickle did not address my question.

The extreme delay in docketing my pleadings amount to a violation of due process and a total deprivation of my opportunity to be heard before I may be deprived of fundamental rights in a criminal-like proceeding.¹⁰

¹⁰ *US. v. Mohawk*, 20 F.3d 1480, 1485 (9th Cir. 1994) *Rheuark v. Shaw*, 628 F.2d 297, 303 (5th Cir. 1980); *Harris v. Champion*, 15 F.3d 1538, 1557 (10th Cir. 1994) (“See Way, 421 F.2d at 146-47 (conditionally excusing petitioner from having to raise issue of delay to “the very courts which are responsible, on the face of the pleadings, for the very delay of which he complains”); *Brooks v. Jones*, 875 F.2d 30, 31 (2d Cir. 1989) (“When the petitioner can substantiate his complaint that his right to appeal is being violated by inattention and time-consuming procedures, to require one more technical step would be to tolerate the frustration of the petitioner’s due process rights.”); *United States ex rel. Hankins*, 582 F. Supp. at 182 (“[W]here the [government] process is itself the basis for the claim[ed] denial of due process the issue has properly been presented” [to the judges]).” Id. (“The Supreme Court stated in *Bartone v. United States*, 375 U.S. 52, 54 (1963), “where state procedural snarls or obstacles preclude an effective state remedy against unconstitutional convictions, federal courts have no other choice but to grant relief in the collateral proceedings.” The Third Circuit in *Zicarelli v. Gray*, 543 F.2d 466, 472 (3rd Cir. 1977) emphasized the rationale of *Stone v. Powell*, 428 U.S. 465, 96 S.Ct. 3037, 49 L.Ed.2d 1067 (1976), and the necessity of a federal court to scrutinize whether the state system granted a fair opportunity to consider arguments that are raised in a petition for federal habeas corpus. *Ray v. Howard*, 486 F. Supp. 638 (E.D.Pa. 1980). ”)

In *Marbury v. Madison*, 5 U.S. 137, 147 (1803) this Court held, “ It is a settled and invariable principle, that every right, when withheld, must have a remedy, and every injury its proper redress. 3 Bl. Com. 109. ” I am prejudiced by the denial of access to the courts. Structural error includes deterrence of right to appeal. See, *Borough of Duryea v. Guarnieri*, 564 U.S. 379, 387 (2011) (“This Court's precedents confirm that the Petition Clause protects the right of individuals to appeal to courts and other forums established by the government for resolution of legal disputes. ‘[T]he right of access to courts for redress of wrongs is an aspect of the First Amendment right to petition the government.’”); *Stokes v. Delo*, 495 U.S. 320, 323 (1990) (“Delay or default by courts in the federal system must not be allowed to deprive parties, including States, of the lawful process to which they are entitled. ”)

I respectfully requested this court consider the Supplemental Brief to cure my invoked 1st and 5th Amendment rights from deprivations. I attach it hereto in part in the 116th Amendment. But this Court retains the physical copies and has not sent them back to me.

This Court previously appeared to deny my right to petition and access to the courts by not docketed a slew of other motions I attach hereto and incorporate herein including a petition it appeared to docket in another case. (77th Affidavit, 104th affidavit not attached, focus on exhibits in D therein, 124th Affidavit)

For one example, the US Supreme Court previously docketed a petition to excuse the paper copies requirement, held it had authority to grant it, but denied it based on the facts of the case. *Snider v. All State Administrators*, 414 U.S. 685 (1974). If the Court previously docketed a petition regarding exemption from additional paper copies, indicated it had authority to consider it, it arguably has authority to consider it and docket it in my case too. It was structural error to not docket the motion.

Nevertheless the US Supreme Court did not docket my similar filing I attach hereto as 124th Affidavit in Exhibit B. This Court did not docket a series of filings I believe should have been docketed included in part as attachments to the 124th Affidavit..

Similarly, the PA Supreme Court Clerk Nicole Traini did not docket a number motions I discuss and attached to the Supplemental Brief including the 5th and 7th Affidavits available at 21-1490 Kelly v Swartz. One concerns whether PA's denial of my asserted ADA claims relating to physical limitations where I require time not only for a fair proceeding but sought a religious objection where I assert my right to preserve my life and health as a religious exercise and asserted religious objections to professional examination and treatment violating my 1st Amendment right to access to the courts applicable to the state via the 14th Amendment and 14th Amendment right to a fair proceeding. I believe more people go to hell and harm others by blindly adhering to the science, experts and professionals in the medical profession than many other professions. I have sincere not fake, but genuine religious objections to making man and man's work by making science guide, master and God to preserve both my life and eternal life. I encourage studying and examining issues, but I sincerely believe people are misled into ignorantly harming others on their own way to hell for even teaching people to trust the experts, the doctors and the science. They may harm them to serve material gain even knowledge. I believe this makes fallible imperfect man and his work God and reflects the image of the evil one outlined in *Isaiah* 14, where he sought to be his own God.

The devil and misguided people teach getting it wrong is okay so long as you learned and did not know. My God teaches many are damned to hell the last day for getting it wrong and for not knowing, not caring to know in order to love one, even those outside of your own another not commit human sacrifice of life, liberty and health to serve your own at the expense of violating

the Constitutional rights of others. Slavery should not be permitted by non-government entities and the human sacrifice by selling products that kill, or produce them in a manner that slowly poisons people to death should be corrected not ignored. Because I believe people go to hell for blindly doing what they are trained to do, their job requires, or their narrow experience requires without thinking things out to care to love others they harm, I believe Court correction may save lives of innocent victims and the souls blind wrong doers.

Despite my good faith invocation of the right to a fair proceeding under the 14th Amendment the PA Clerk refused to docket my petition because my 1st Amendment rights to religious beliefs were “unusual.” This Court in *United States v. Finnell*, 185 U.S. 236, 249 (1902) held, “The clerk is a ministerial officer, and, without statutory authority, can exercise no judicial functions.”

Accordingly, it was improper for the PA clerk and this United States Supreme Court’s staff to deprive me of asserted fundamental rights by performing a judicial function. This error is structural. Just as it was structural error for this United States Supreme court’s staff to not docket the attached Supplemental Brief contained in the appendix as an Exhibit to App. L.

Nicole Traini, the Clerk of Court for the PA Supreme Court in Pittsburgh, PA indicated the clerks talk to one another. The PA Court inappropriately denied docketing my motions relating to my assertions for accommodations for my religious beliefs and health, which I averred in the Supplemental brief while attaching proof of the deprivation of my procedural due process applicable to the state via the 14th Amendment. I even asserted an ADA accommodation because I do not want to die for the vanity of lawless man whose evil eyes are focused on convenience, avoidance of costs, at the exchange of sacrificing of the lives and liberties they swore an oath to protect by upholding the constitution. See Matthew 6:22-23

concerning Jesus's teachings of the evil eye revealing a dirty covetous heart not full of love but yucky lusts for comfort and material gain indifferent of harm or human sacrifice of life, liberty or health of other people God loves. This is a type of lawlessness that leads to certain damnation in the fires of hell without repentance, even thinking this way is sin to God.

I believe it was wrong for the US Supreme Court staff to reject motions I filed by not docketing them, just like I believe it was wrong for the PA Supreme Court to not docket motions I filed merely because they thought my accommodations for time based on religious beliefs in part my exercise of the right to live without harm to health is a religious exercise and to prevent vitiating my access to the courts to fairly petition to defend fundamental rights but for the denial of the accommodation in the form of time, and exemptions of costs on religious grounds against compelled violations of one fundamental right in exchange for another when freedoms are not for sale despite the lies of the devil which misguided, lawless people aka children of the devil teach that you must buy or earn that which is free. Not everyone is a child of God. We are all born children of the devil, in need of salvation from death. *Psalm* 51:5 states that we all come into the world as sinners: "Behold, I was brought forth in iniquity, and in sin my mother conceived me." *Ephesians* 2:2 says that all people who are not in Christ are "sons of disobedience." *Ephesians* 2:3 also establishes this, saying that we are all "by nature children of wrath." Not all people are born again and made clean by repentance, but we all have a choice we must independently each make. See, *Deuteronomy* 30:19 ("I call heaven and earth to record this day against you that I have set before you life and death, blessing and cursing. Therefore choose life, that both thou and thy seed may live").

The PA Clerk did not docket the motions. Josh the case manager for the matter indicated the judges will not review items not docketed as filed. Similarly, the supplemental brief was not

docketed or rejected. It matters not that the US Supreme Court may choose to look at undocketed submissions. Just like Josh indicated they placed my undocketed PA Supreme Court motions in the sleeve of the file as opposed to returning them to me with a letter indicating why they were returned doesn't mean the PA Court will ever look at the. Similarly, the US Supreme Court will not review undocketed information especially in light of reviewing hundreds of filings at one conference. I was deprived of a fair opportunity to be heard in violation of procedural due process applicable to the US Supreme Court because it neither accepted or rejected the November 6th filing . It was not docketed as of the date of the conference despite the rules indicating it would be deemed considered so long as I submitted it prior to the date of finality. Rule 25.6.

I am concerned the US Supreme Court staff may be trying to insulate the lower courts from being bound by the Constitutional Rule of law to aide PA Courts and itself as a partial forum to rebut an argument contained in the unaccounted for Nov. 6, 2023 petition, *Petitioner Meghan M. Kelly's Supplemental Brief to provide additional information not previously available on how private partnerships with the UN is schemed to be used to eliminate judicial authority in open and by stealth, Petitioner's belief the courts are in danger especially with the debt ceiling approaching November 17, 2023 with no agreement to date, and the convening of Congress October 19, 2023 to attack Justice Thomas and the integrity of the court by subpoenaing witnesses to be used against Justice Thomas and the Court, dated 11/6/23, regarding denying the 1st Amendment right to petition by not docketing pleadings.*

I filed a bunch of motions with the US Supreme Court which I believe were not docketed in error as a matter of law I suspect to create precedent for the PA Supreme Court clerk's error, including a petition to exempt the paper copy requirement.

As I previously mentioned the US Supreme Court previously docketed a petition to excuse the paper copies requirement, held it had authority to grant it, but denied it based on the facts of the case. *Snider v. All State Administrators*, 414 U.S. 685 (1974) (“While we undoubtedly have authority to waive the application of particular rules in appropriate circumstances, we have during this Term denied a considerable number of similar motions. Typically in each of these cases the moving petitioner made generalized allegations of inability to afford payment of printing costs, but made no showing sufficient”) My case is distinguished from the case where the court denied the request to eliminate paper copies in order to assert the need is to protect my 1st Amendment right to religious belief in addition to access to the courts and other claims, which this claimant did not appear to do sufficiently. See, *Snider v. All State Administrators*, 414 U.S. 685 (1974) (“Petitioner Snider has filed a motion to dispense with the printing of the petition for certiorari as required by our Rule 39. He has filed no motion and affidavit”) If the Court previously docketed a petition regarding exemption from additional paper copies, indicated it had authority to consider it, it arguably has authority to consider it and docket it in my case too.

Nevertheless the US Supreme Court did not docket my similar filing I attach to the 124th Affidavit at Exhibit B and incorporated herein by reference please find, *Petitioner Meghan M. Kelly’s Motion for an exemption from the requirement to serve 10 paper copies of pleadings with this Court pursuant to Rule 12(2), 29(1), and 39(2), by the filing of one paper copy, and in addition to, or in the alternative of, permission to serve the United States Supreme Court electronically without a paper copy for future filings, due to costs relating to printing, mailing and transporting pleadings to the Post Office, creating a substantial burden upon my access to the Court’s to defend my exercise of fundamental rights, and forced violation of religious beliefs*

by the threat of indebtedness and per the US Supreme Court letter rejecting the filing for docketing also attached hereto.

On November 20, 2023 I called Lisa Nesbett the US Supreme Court case manager concerning the whereabouts of the Supplemental Brief.

She asked whether I want the documents back should they be rejected. I said I required a letter indicating why they were rejected with time to cure for a reason should they be returned in accordance with case law and Supreme Court Rule 25.6.

I also indicated no one knew where the documents were when I called previously. She provided me with one person's name, Donald Baker at the US whose number is 202-479-3035 in the briefing department to check on the whereabouts of the documents.

When I did a google search, I discovered this gentleman appeared to deprive another lawyer of the 1st Amendment right to petition per the attached brief and denial of rehearing, per the documents attached to Affidavit 127th included herein.

No good may come by contacting him when I plead the Court itself deprived me of the 1st Amendment right to petition by neither accepting or rejecting the Supplemental Brief for a legal reason, and my right to be fully and fairly heard before deprivation of my fundamental rights and my interests in the PA license in accordance with the 5th Amendment when the US Supreme Court has created the beginning of a course of conduct that not all applicants have Equal access to the US Supreme Court in violation of the 1st Amendment right to petition.

Yet, I called him on December 15, 2023 from the law library anyways. My internet was out and I saw after a month and a half in delays the court noted the filing was rejected on December 14, 2023. But no staff could tell me why it was rejected or indicate why there is no letter indicating defects with opportunity to cure any alleged deficiency.

Injustice is guaranteed and there is no Equal protection of rights in accordance with the 5th applicable to the Federal government or the 14th Applicable to the states when petitions are not accepted or rejected for lawful reasons providing constitutionally sufficient notice for defects to allow for cure in good faith cases to prevent injustice.

With regards to the attached case Supreme Court Number 17-256 it appears the lawyer was concerned with conflict of interests with the Court regarding associations being used by justices to eliminate individual rights by account of their partiality towards associations at the cost of human sacrifice of life, liberty, or health of the individual people US Supreme Court justices serve. 127th Affidavit.

I think the better course of the lawyer's allegation that neither Clerk Baker or Clerk Bickell's agreement not to docket a Motion was to docket it and allow it to be considered by the US Supreme Court as not to deprive the petitioner of the right to petition under the 1st Amendment even if it forced the US Supreme Court to analyze its own behavior as upholding or violating the Constitution.

I cite the attached Attorney Shao's Motion contained in the 127th Affidavit attached hereto:

On 10/23/2017, Petitioner telephoned Mr. Baker to ask why the Amicus Curiae motion was not filed. Mr. Baker transferred the call to Mr. Bickell (telephone number of 202-479-3263). He stated that it was the joint decision between Mr. Baker and him not to file the Amicus Curiae motion. He asserted that pursuant to Rule 37.2, the time to file an Amicus Curiae Brief could not be extended. When corrected, he later acknowledged that Rule 37.2 applies only to Amicus Curiae Briefs, not Amicus Curiae Motions. He stated that he decided not to file the corrected Amicus Curiae Motion since it had "too much deficiency" but he was unable to identify what such deficiencies were. Mr. Brickell argued that

the same exact motion had been filed in 17-256 so the court had had a chance to consider its contents there. He was unable to explain why if the Amicus motion was too deficient to file in this matter, it had been deemed acceptable to be filed in 17-256

This is not fair or just, especially because it appears to be on viewpoint grounds in violation of the 1st Amendment right to speech. Regardless, I told my case manager I requested a letter outlining the deficiency and opportunity to cure in accordance with Rule 25.6.

I also indicated to Lisa Nesbitt I may want to file documents under seal, but I could not file redacted versions since the documents themselves I seek to seal in full.

I believe the bankruptcy remote entities will be used by Non-government entities (“NGOs”) down the line to overthrow the government by controlling the resources including the channels and the debt credit through block chain tokens and bids on data and other resources, to control the government to overtake the government sometime after 2050.

Bankruptcy remote entities by their creation are not dissolved should its managing member be dissolved in bankruptcy because a springing member hops into their place upon the occurrence of bankruptcy protected by the Contract Clause of the US applicable to the states to allow the criminal activity of reselling securitized debt at a profit into infinity that is nothing but discharged debts that no one will ever pay. It is a Ponzi scheme similar to the 80 trillion dollar US debt owed predominantly to government workers pensions that was written off in debt swaps, meaning tax breaks not to be paid off by design in a controlled crash that will harm the baby boomers and the world if the courts do not save us. Bankruptcy remote entities allow banks and other entities to resell bad debt that will never be paid that was previously written off into infinity.

I outlined how I would coin correctly without violating the 1st and 13th Amendment as applied to my concerning my religious beliefs against enslaving other free people in the attached civil rights complaint. 3DI56.

I believe the courts are in trouble, and the new way money will be coined increases the threat. I seek to preserve the courts by requiring they adhere to the Constitution and the rule of law with mercy, not violate it to serve marketing their selfish positions to sustain profit which is the mark of lawlessness leading to hell per Jesus Christ. Human sacrifice of life, liberty and health by compelled government backed force for material gain under the lie of the common good or public good does not protect freedom or the public but is the type of controlled order children of the devil implement.

Children of the devil are controlled by human desires not yet saved from hell. They are blinded by the desires of man. So they do not impartially do what is right. I believe God who is even if the Bible ceases to be. Yet, God teaches us that we are to shed light on unjust laws to prevent the wrong doers from being destroyed in hell just like God does *See, Isaiah 10:1-2*: (“Woe to those who make unjust laws, to those who issue oppressive decrees, to deprive the poor of their rights and withhold justice from the oppressed of my people, making widows their prey and robbing the fatherless.”) I sit up straight when God says Woe to you and hear Damned to hell are you should you not turn away from lawless lusts leading us to become too dirty and disgusting to have eternal life by compromising what is right for what is convenient, profitable etc.... *Isaiah 28:13* provides: “But the word of the LORD was unto them precept upon precept, precept upon precept; rule upon rule, line upon line; here a little, and there a little; that they might go, and fall backward, and be broken, and snared, and taken.” I understand this to mean that judges and law makers make compelled rigid sameness the law without understanding

protecting preempting laws against slavery to the mob's lawless lusts, safeguarding lives and freedom from compelled conformity of belief. My God teaches me to be separate by not sinning even if the majority praises lawless lusts business greed, organized charity in violation of Matthew 6:1-4 and other things that I believe damn people to hell as good.

The Constitutional law that protects freedom must not be sacrificed for national interests, the lie of the public good, or the lie of the common good as Justice Jackson indicated in *Board of Education v. Barnette*, 319 U.S. 624 (1943) rather brilliantly explained:

At Page 640 "National unity as an end which officials may foster by persuasion and example is not in question. The problem is whether under our Constitution compulsion as here employed is a permissible means for its achievement"

At Page 641 "As governmental pressure toward unity becomes greater, so strife becomes more bitter as to whose unity it shall be."

At page 641 "As governmental pressure toward unity becomes greater, so strife becomes more bitter as to whose unity it shall be. Probably no deeper division of our people could proceed from any provocation than from finding it necessary to choose what doctrine and whose program public educational officials shall compel youth to unite in embracing. Ultimate futility of such attempts to compel coherence is the lesson of every such effort from the Roman drive to stamp out Christianity as a disturber of its pagan unity, the Inquisition, as a means to religious and dynastic unity, the Siberian exiles as a means to Russian unity, down to the fast failing efforts of our present totalitarian enemies. Those who begin coercive elimination of dissent soon find themselves exterminating dissenters. Compulsory unification of opinion achieves only the unanimity of the graveyard."

I especially liked how Justice Jackson rebutted arguments relating to competency and elimination of individual 1st Amendment rights to be sacrificed for national unity which eliminates every freedom for the collective compelled not freely chosen goal in his spicy opinion.

I do not believe governments exist by consent of the governed. Government exists by the rule of law. Our freer fairer government is sustained by people judges. They are not dissolved by the argument consent may be revoked, when there is no consent in the lie of a social

contract constructed by Lucifer the devil and lawless men acting based on lusts under the feign of the just rule of law. By upholding individual liberty from being sacrificed by the representative vote in the other two branches of government, the courts give us actual freedom that our freedoms will also be protected. The actual upholding of justice and the rule of law is what unifies this country.

It is the court which grants us liberty and freedom and a democracy in our democratic republic. Without courts, the law of Satan, Darwin and even Economists Keynes and Adam Smith taught money and might makes right, and reign by mobsters who use money, connections or power to rule a no longer free people would occur.

I was reading about how churches used the fallacy of consent of the governed with regards to the Scots through a friar's opposition of the papal rule by Edward I or II of England in support of King or Lord Roberts of Scotland in the 1300s. I believe it is based on a fallacy.

The Bible teaches owe nothing to anyone but to love them. When you make man or money to care for your own your master as opposed to greater laws, including the superseding Constitutional law, you became a slave to the world's will. It makes fallible replaceable lawless lustful men demi-gods who mislead people to harm for material gain if unrestrained by the just rule of law. The courts make our government more just by restraining the conduct of officials within all three branches to obey the Constitutional law without immunity to restrict government authority to protect Constitutional freedoms from being sacrificed under the lie of the common good, public or material gain even knowledge. Human sacrifice of life, liberty or health to serve government seats, government popularity or government profit or positions is lawlessness and must not be condoned and rewarded by the courts.

Plus Locke was wrong. There is no consent of the governed when the government and government backed private or foreign partners oppress, enslave, kill, steal or destroy. There is no meeting of the minds of the common people to form a government or to allow government condoned human sacrifice for material gain in exchange for government's protections of freedom. Freedom is not for sale or it is not free by barter or exchange in contract law, even the lie of social contracts the devil teaches. The lie of Satan and his children is that people must barter for freedom by making mammon God is not true. Jesus teaches this is the way to hell in *Matthew 6:24*. Other people's souls are not for sale making them for sale by involuntary government backed physical, social or economic force according to arguments by Plato for a Republic as opposed to our greater institution a democratic republic.

The falsehood Locke rests on of a social compelled contract where people are enslaved as human capital to give the fat of their labor of sheep to wolves who devour them is likened to men saying she dressed pretty. So, she contracted agreed to be raped as the people did not consent to be exploited or oppressed to serve the material gain of those Plato likened to Philosopher kings backed by force and social pressure not the just rule of law.

Our democratic-republic is fashioned to protect certain freedoms, including the right to petition, speech, religious belief, against involuntary servitude even by government backed partners like the UN makes our union more indestructible in the face of a planned overthrow. We are protected by the just rule of law that prevents human sacrifice for material gain. People judges not money or might are our only hope of a hero to sustain the freedoms that make this country already great.

Our United States is held together by the rule of law. It is degraded when Courts violate the rule of law, but is strengthened when the courts humbly correct even the courts in cases and controversies.

Justice is not a matter of popularity. Injustice is guaranteed under the Roman traditions of majority vote that killed my savior Lord Jesus Christ. Justice is a matter of truth which protects freedoms of speech, association, petition of religious beliefs and other beliefs the courts may even disagree with. This disagreement humbles us and innovates by helping us learn from one another. Our nation is strengthened when the courts protect people who believe differently by showing even minorities under the threat of government backed physical, social and economic force including physical threats or harm because of my religious-political belief are still safeguarded not enslaved to the compelled beliefs of the most popular fickle fads of the majority. It helps us to care about people we may have overlooked instead of sacrificing people by valuing moth and rust more than humanity and liberty which I the mark of the beast spoken of in Revelation. Courts can tame that beast sin that enslaves many to lawless lusts leading to harming others to lose their own lives in the second death the last day.

I do not want any of the staff at the US Supreme Court to be harmed. I am disappointed because my petitions were not docketed and I was deprived of Due Process and an opportunity to be heard. In the petitions I not only asserting my rights to prevent vitiation but I also sought to alert this US Supreme Court that I believe it is in danger. So, our freedoms are not protected without protecting our freedom to petition to assert them before you. The PA case is a better forum to analyze attorney and lawyer disciplinary rules, but this Court denied me access.

This Court may reopen that case. In *United States v. Ohio Power Co.*, 353 U.S. 98 (1957) (“Certiorari denied October 17, 1955. Rehearing denied December 5, 1955. Rehearing

again denied May 26, 1956. Order denying rehearing vacated June 11, 1956. Rehearing and certiorari granted and case decided April 1, 1957), this Court rejected a third petition for rehearing by sua sponte reopening the case to hear. Yet the court removed the Supplemental Brief from the docket and from electronic filing. As of December 24, 2023 it has not returned the Supplemental brief in its physical form and I emailed the brief with all the exhibits in full to the Emergency Clerk Robert Meek in full while copying opposing counsel in that case. So, this court may sua sponte reopen that petition yet to cure defects.

On December 8, 2023 I emailed Donald Baker:

“I am appealing the 11/13/23 decision denying the rehearing to grant cert, NOT the denial rendered previously.

No case law I have found states that I am not permitted to file a petition for a rehearing on denial of a rehearing in fact case appears to indicate I am permitted to do so. If it is done in other cases, I must not be deprived of the opportunity to do so in this case without disparate treatment by the Federal government through this Court's staff in contravention of the 1st and 5th Amendments denial of access to the courts in this criminal like proceeding based on viewpoint.

In the 5th case cited to the Lexis annotations to Rule 44 the United States Supreme Court cited a case where the Court granted petitions for rehearing from denial of the rehearing order to hear and allowed it to be docketed again exceeding the 25 day limit of the writ of cert which does not matter filed within the deadline

In *United States v. Ohio Power Co.*, 353 U.S. 98 (1957), This United States Supreme Court “Certiorari denied October 17, 1955. Rehearing denied December 5, 1955. Rehearing again denied May 26, 1956. Order denying rehearing vacated June 11, 1956. Rehearing and certiorari granted and case decided April 1, 1957. ”

I believe it would be unlawful for clerks to make judicial determinations. I believe this must be submitted and docketed for the Court to make that legal determination, not the staff who are not the judges.

Further, I believe the courts are in imminent danger and I desire the courts to say what the law is as a court not self-regulation by each judge nor regulation compelled by congress which forced justices to be below the law by compelling 5th amendment self-incrimination violations nor by lobbyists who threaten their seats to create a partial unfair to me and other claimants in violation of the 5th Amendment's equal protection component.

The new information occurred after I filed the Oct 18, 2023 initial petition for rehearing which I am seeking a rehearing on based on the court's Order.

Rule 44.1 provides:

1. Any petition for the rehearing of **any judgment or decision of the Court on the merits shall be filed within 25 days** after entry of the judgment or decision, unless the Court or a Justice shortens or extends the time. The petitioner shall file 40 copies of the rehearing petition and shall pay the filing fee prescribed by Rule 38(b), except that a petitioner proceeding *in forma pauperis* under Rule 39, including an inmate of an institution, shall file the number of copies required for a petition by such a person under Rule 12.2. The petition shall state its grounds briefly and distinctly and shall be served as required by Rule 29. The petition shall be presented together with certification of counsel (or of a party unrepresented by counsel) that it is presented in good faith and not for delay; one copy of the certificate shall bear the signature of counsel (or of a party unrepresented by counsel). A copy of the certificate shall follow and be attached to each copy of the petition. A petition for rehearing is not subject to oral argument and will not be granted except by a majority of the Court, at the instance of a Justice who concurred in the judgment or decision.

A denial of the petition is on the merits. 44.2 deals specifically and separately with rehearings of an order denying a petition for a writ of certiorari.

They are distinguished separately.

Moreover, the Court granted petitions for rehearing even when it exceeded 25 days in the interest of justice in another case. Thus, my petition must in the interest of justice be docketed so as not to deprive me of access to the courts to not only vitiate property interests but the liberties I am being labeled disabled and unable to buy and sell as an attorney for my private 1st Amendment rights to religious belief, exercise of religious belief, association and petition, without insidious disparate treatment based on viewpoint of speech contained in my petitions.

This Court held, Respondent was entitled to obtain a recall and amendment of Supreme Court's erroneous judgment, even after the denial of a motion for rehearing, notwithstanding this rule barring consecutive and out of time petitions for rehearing. *Cahill v. New York, N.H. & H.R. Co., Conn.*1956, 76 S.Ct. 758, 351 U.S. 183, 100 L.Ed. 1075

This Court held, the interest in finality of litigation must yield where interests of justice would make strict application of rules unfair with regards to Rule 44. *Gondeck v. Pan Am. World Airways, Inc., Fla.*1965, 86 S.Ct. 153, 382 U.S. 25, 15 L.Ed.2d 21

A petition for rehearing after denial of petition for certiorari is not an empty formality and denial of certiorari should not be treated as a definitive determination, subject to all the consequences of such an interpretation, but, on an appropriate showing that a

substantial matter is to be presented on rehearing, appropriate opportunity should be given for doing so. *Flynn v. U.S.*, N.Y.1955, 75 S.Ct. 285

Yet, my first petition was rendered an empty formality and I was deprived of a full and fair opportunity to be heard by this Courts failure to include the timely filed Supplemental Brief containing material information necessary for the court's determination before depriving me of my right to buy and sell as a lawyer but for my religious beliefs in Jesus Christ as God not money and material gain. In fact I believe those who make money and material gain, even convenience their guide and God are led astray to lose eternal life per Matthew 6:24 should they not repent.

All I ask is for the Court to honor and uphold the Constitutional right to access to the courts which is never a guarantee of justice, but injustice is cemented when claimants are deprived of a fair and impartial forum to address their grievances.”

I not only was deprived of access to the courts by this Supreme Court’s staff for the November 6, 2023 Supplemental Brief, I was denied access to the courts for the Petition for rehearing submitted December 1, 2023, and the petition for rehearing of the November 13, 2023 order, I attach in part in the appendix.

I submitted the petition for a rehearing contained in Appendix L timely within the 25 days of the decision I seek a rehearing on the 11/13/23 decision **denying the first petition for rehearing** in accordance with the time frame of Rule 44.2 to include intervening causes of substantial or controlling effect concerning my arguments and other claims not previously considered which will vitiate my rights should the court not hear this rehearing since the date of the first Petition of rehearing was submitted 10/18/23. The deadline is 12/8/23.

This Court has accepted subsequent petitions for petitions rehearing. For example in *United States v. Ohio Power Co.*, 353 U.S. 98 (1957) this Court considered 3 petitions for rehearing by claimant, denied all three, then vacated its order a year later, and granted rehearing and certiorari *sua sponte*.

With that important doctrine this US Supreme Court may reopen any of my petitions sua sponte to address the issues that endanger courts by third party and self-regulation by limiting discipline of judges to the purview of what this court says is law in an actual case that binds congress and the president within their limits. See, Chicago Kent Law review, *Rehearing SUA Sponte in the U.S. Supreme Court: A Procedure for Judicial Policymaking*, by Rosemary Krimbel, dated October 1989.

On 11/13/23 to my horror this Court passed an ethics code. Some members of Congress seek to use a code or regulations to control the courts. I oppose regulating the US Supreme Court, District Courts and Appellate Courts. The only manner to correct judges is within the purview of the Constitutional limits including in cases or controversies such as this one as I am doing now or impeachment. Regulating the Court, even by self-regulation violates my 5th Amendment right to an impartial forum as applied by creating a forum that is partial towards its appearance before regulators, even itself, instead of the impartial application of the Constitution to the rule of law.

The rule of law, not money or might is the glue that holds this nation together no matter how richly fragmented. I believe requiring the courts do what is right by upholding the impartial rule of law as applied to itself will safeguard the judiciary and these United States from a very real-intentional-unnatural-schemed overthrow.

When I ran for office in 2018 I discovered a scheme to eliminate people lawyers and people judges to eliminate the rule of law that restrains individuals in collective entities from enslaving, killing, stealing and destroying human life, health or liberty for material gain under the lie of Lucifer the common good or public good. I believe the bankruptcy remote entities will be used to maintain debt slavery in a Ponzi scheme of reselling what does not exist to maintain

slavery debt first by carbon credit control and later by utter control of every person and everything with no government to restrain entities with the just rule of law. (126th and 127th attached affidavits)

To my horror after I drafted the Second Petition for a rehearing dated 11/30/23, for reconsidering of the 11/13/23 Order submitted 12/1/23 and attached hereto for a rehearing on matters subsequent to October 18, 2023, the Senate authorized subpoenas to Leonard Leo and Harlan Crow, per the attached newspaper article. I believe Leonard Leo and Harlan Crow are being set up to fall or to make the court fall, through incriminating individual judges. I am concerned they may be criminally prosecuted or sued under the bribery statute 18 USC 201, even if they did nothing wrong. Regardless they will be incriminated by social attacks incited by the whims of congressmen to garner support for their election seats by making a horse and pony show out of incriminating the justices of the US Supreme Court. I believe they must invoke the 5th to protect not only themselves from a set up, but the courts and the rule of law too. The goal of the testimony is to incriminate them and the court.

This new information relates to two issues I asserted the Court rejected consideration on 11/13/23: where I argue this Court hold here and now that 1) the US Supreme Court may only be disciplined or checked within the purview of the Constitutional limits of 1. a case and Controversy under Art. III, and 2. by impeachment, without waiver to preserve my right and other claimants right under the 5th Amendment Equal protections component and procedural Due Process component to an impartial forum not partial towards an ethics code or towards regulations to maintain justices' seats but partial towards upholding the Constitutional rule of law as applied to cases, and 2) the Courts may not violate the Constitution by impeding and chilling the checks upon its own branch, and its own justices via punishing me in terms of

petitioning the courts to uphold and not violate the Constitutional law based on viewpoint of speech, and partiality to courts at the bias against those who petition for relief against them.

This reciprocal case arises based on my petitions in *Kelly v Trump* to the Delaware Chancery Court and the Delaware Supreme Court to correct judicial misconduct or mistakes, and to safeguard my exercise of religious beliefs substantially burdened by President Trump by the establishment of government religion exhibited by a course of conduct including but not limited to the passage and enforcement of certain executive orders.

If this US Supreme Court determines the DE State Court may not violate the Constitution by chilling the Constitutional check upon itself by vindictively punishing me for petitioning to correct, not destroy the court to preserve my 1st Amendment access to the courts and other Constitutional rights and claims based on the perceived Court agents' religious-political poverty animus than the basis for the reciprocal Orders are eliminated. And this Court must overturn the Order placing my license on inactive disabled or disbarred. Otherwise the Courts do not uphold the Constitution by favoring justices' personal interest in marketing their work and preserving their pay by preserving their government positions in violation of the Equal Protections Clause and the rule of law.

Nevertheless, I am deprived of fairly and fully petitioning in this case concerning the important issues by petitioning to assert and not willingly waive my rights in the PA case which were unfairly vitiated anyways by partial whims of staff not the impartial rule of law. See, *Borough of Duryea v. Guarnieri*, 564 U.S. 379, 387 (2011) ("This Court's precedents confirm that the Petition Clause protects the right of individuals to appeal to courts and other forums established by the government for resolution of legal disputes. '[T]he right of access to courts for redress of wrongs is an aspect of the First Amendment right to petition the government.'")

The fact mistakes are made, including by me not merely staff show how necessary this United States Courts staff are to the judiciary. People staff are indispensable, without them claimants are deprived of any justice by overlooked papers that automation would never resolve.

I applaud the court when it upholds justice, even if delayed. Doing the right thing matters, and actually is more important than winning or losing on petitions. How you got there matters more than winning or losing, and unfair even mistaken deprivations of access to the courts cause injustices.

I seek to protect and preserve the court by preserving the rule of law that upholds these United states.

Per *State ex rel. Citizens National Bank v. Superior Court*, 236 Ind. 135, 139-40 (Ind. 1956),

“it is well settled that although a clerk of the court may perform acts of a ministerial and nondiscretionary character with respect to judicial proceedings, such clerk has no judicial powers in the absence of specific statutory or constitutional authority. When judicial or quasi-judicial powers are expressly conferred upon clerks of court, the clerk's authority is strictly limited within the terms of the statutory or constitutional provision conferring it. See: 14 C.J.S., Clerks of Courts, §§ 35 and 36, p. 1243. ”)

Unfortunately, the Staff at the US Supreme Court not only removed exhibits in one case, but wiped out my contested undocketed filings by not only removing it from the public docket but removing it from the electronic filing receipt, while not similarly removing other documents rejected from the US Supreme Court filing system, intentionally making it more difficult to cure or petition to cure, despite an entire law review article full of cases reopened sua sponte by this US Supreme Court. Given I believe this United States Supreme Court is in danger, making us all in danger not only do I but the country and the world faces irreparable injury, but for this Court's denial of access to the courts in my other cases.

VII. Reciprocal proceeding is unwarranted. The original DE Proceeding Violated Procedural Due Process, First Amendment, Substantive Due Process Clause and Equal Protection Clauses of the Fourteenth Amendment.

This appeal also relates to Delaware's punishment of me disparately in contravention of the 1st via the 14th Amendment for private speech outlined in my Religious Freedom Restoration Act petition petitions, where my religious belief is material to the issues therein, based on subject matter grounds of disagreeing with my religious beliefs and disciplining me for asserting my right to believe differently as a private individual.

DE Courts not only deprived me of access to the courts and violated my First Amendment rights applicable to the state via the 14th Amendment during *Kelly v Trump*, but later, after I filed a civil rights case, the state initiated a disciplinary proceeding, where it treated me unfairly, deprived me of a fair opportunity to be heard my asserted right to notice, asserted not waived right to prepare, to call witnesses, to perform discovery, 6th Amendment right to self-representation applicable to the Courts via the 14th, to notice in conformity with the DE rules and other by punishing me and attacking me in *Kelly v Trump*

The State Court violated my right to notice by affording insufficient notice in fewer days than the state rules required prejudicing me, ignored motions and did not docket them, than ruled I had no right to what was docketed in *Matter 541* regarding appointment of counsel where I am the party. It is my religious belief that Jesus commands us to allow God through the holy spirit to be our advocate when we are brought wrongly to the courts but for our faith in Jesus. Citing, *Luke 12:11*. The Court did not allow me the asserted 1st and 6th Amendment to self-represent on the espoused religious grounds until late December 30, 2021, fewer than two weeks before the alleged hearing without ruling on my motions for discovery, objecting to notice and other matters at all until 2 days before the initial hearing date by email the hearing was on. I was so distraught about the appointment of counsel I got the shingles. The Court scheduled the hearing 8 days by postponement in response to my emergency motions and appeal to the DE State Court to deprive

me of the more than 10 days required to adhere to the Del. Law. R. of Disciplinary Proc. Rule 12(h) in subpoenaing witnesses to call my suspected accuser Arline Simmons. While the ODC violated the same rule by failing to provide material 10 days in advance pursuant to Rule 12(h) which prejudiced me of a fair proceeding in the rushed fixed proceeding against me. This Court in *Greene v. McElroy*, 360 U.S. 474, 475 (1959), held “this Court will not hold that a person may be deprived of the right to follow his chosen profession without full hearings where accusers may be confronted and cross-examined”. Thus, this Court must not deprive me of my the DE Court nor the Appellee below afforded a full hearing where I could confront accusers and cross examine them in this criminal like proceeding. Thus, this Court must void the District-Court order based on deprivations of procedural due process in the original case and this case.

The only notice I received concerning original discipline was I was being disciplined for my religious beliefs which allegedly was illogical and did not make sense to the state. My protected exercise of religious belief in Jesus by keeping myself separate from the world by not sinning which is committing lawlessness in the eyes of God is my most important aim in my life. I reasonably was upset and became quite sick during the DE Board proceeding. Without haste, in response to the Board’s 8 days I filed a motion to call Arline Simmons and Court of Common Pleas Judge Clark to the hearing. The Board never responded. I also filed a motion for reconsideration by the Board, and appealed the denial of my motions to suspend the hearing while continuing it for 8 days for a reason I did not state in my motion to suspend the proceeding to the DE Supreme Court. I demanded I be afforded time to adhere to the rules to call witnesses, collect discovery and prepare my defense. The 8 days did not waive my objection to the 20 day notice required by *Del. Law. R. of Disciplinary Proc.* Rule 9 (d)(3):of which I was deprived causing prejudice. The DE Supreme Court members Reeves, Vaughn and Traynor called my

interlocutory appeal frivolous to cover up its lawless acts I was not aware of at the time of the trial Board proceeding including to 1. firing two court staff and 2. concealing evidence in my favor by sealing petitions in *Kelly v Trump*. I was compelled to attend a hearing ill, without sleep, opportunity to prepare and present my case in order not to violate another rule creating default judgment or contempt of court. I asserted and did not waive my right to a fair proceeding. I maintained objections at the DE Disciplinary hearing, but more violations arose. The Court reporter accused me falsely of reading documents, possibly to help herself look at them to draft the transcript. The Court reporter made up outrageous things I did not say. The entire transcript of the hearing was inaccurate and prejudicial. Reporter said she could not hear me. I objected to the transcript, and maintained my objections even after I noted some cursory changes. There were too numerous and the transcript was too faulty to correct.

Moreover DE ODC Vavala took over the case despite not attending the hearing, predictably because the other two ODC may be called as witnesses should this case be brought to court. Judge Traynor appeared to be aiding the court in preparing a case against me as I averred in the civil rights case. So, using the 2 ODC as witnesses against me in a potential proceeding is the plan. The procedural due process defects and deprivation of my asserted 1, 6th, 13th, 14th Amendment Constitutional rights applicable to the state via the 14th cause reciprocal discipline to be unwarranted.

The hearings and actions taken against my professional license by Delaware 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.

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.

Reciprocal discipline is not warranted and I should not be denied a fair opportunity to prove this by the District-Court's own violation of my 5th Amendment procedural Due Process rights under the facts of this case.

VIII This Court must overturn App H Order of the 3rd Circuit Clerk refusing to docket Amended Notice of Appeal to preserve and not vitiate my rights and claims related to a District Court Order dated 8/7/23, argument against vitiation of Constitutional rights including religious belief against debt, involuntary servitude under the 13th Amendment and access to the courts without compelled violation of religious belief, should the case not be vacated with an acquittal

The District Court for the Eastern District of PA ("District-Court") ordered me to draft a motion for cause to explain why reciprocal discipline would not be warranted before its Court. (District-Court Docket Item ("DI") DI-2). I drafted a motion for a stay and a corrected motion for a stay. (DI 4, 6) District-Court denied my motion for a stay and corrected motion for a stay.

(DI 3-7), Third Circuit Docket Item (“3DI”) 3DI-27, incorporated herein by reference. Every DI and 3DI cited is incorporated herein by reference in its entirety). In the same Order, the court denied ECF access not ripe for a decision since I did not request ECF at that time. (DI-7)

The Court requested I file a motion for ECF access. Id. I was concerned the District Court may be booby trapping me. 3DI-27. The Court did booby trap me to waste resources to vitiate my access to the courts. I filed a motion for ECF access District Court Case Manager Gail Olson (“Gail”) indicated the court would allow per the emails on the record on 6/21/23, but the court denied it on 8/7/23 as moot. (DI 31-34)

On 8/7/23, I emailed and mailed an amended notice of appeal to District Court to include the 8/8/23 Order. (App. H). Neither the District or Third-Circuit filed it as a notice, despite both courts confirming receipt.

Third-Circuit refused to docket the Amended Notice I filed with the District-Court it received from the District-Court on this case’s record. I placed the amended notice of appeal on the record at 3DI-62 beneath the transcript because I suspected foul play by the Courts, after all the Delaware Supreme Court sealed my petitions and fired witnesses to conceal testimony in my favor to fix the outcome in the sham original disciplinary case against me. (App. H-1) I seek to hold judges are not above the law and that court correction by appeals or law suits must be permitted to preserve the Constitutional rule of law. The Court in bad faith seeks to prevent judges from being accountable to the purview of the Constitutional laws’ limits.

The District-Court did not file the 8/7/23 Amended Notice of appeal. I required it to be docketed to preserve my rights should the case be remanded back to the District Court to prevent vitiation of my fundamental right to religious beliefs against debt by compelled waste of

resources. The clerk confirmed it gave it to the Third Circuit. Third Circuit confirmed receipt, but did not file it. I drafted **another** Amended Notice of Appeal I mailed out and sent electronically on 8/11/23 to preserve the issues and not waive my claims and rights should this US Supreme Court remand the case back to Third Circuit. District-Court filed it per the attached App H-2, but changed electronic notice from “IFP granted” to “No fee paid, no IFP filed” on the electronic notice. District Court granted IFP on 2/8/23 per the attached Order. (App. H-3, H-4, H-5). District-Court filed the second amended Notice appealing denial of ECF access on 8/14/23.

On 8/24/23, the Eastern District Court and the Third Circuit laid another booby trap by creating a new case number, knowing I filed an amended notice I desired the Court to file in this case to preserve my arguments should the case be remanded or reopened. I am shaking I am so upset. The Third Circuit and Justice Diamond are well aware of my genuinely held religious beliefs and how upset the tomfoolery of deceiving me into waste resources against my religious beliefs has been for me. The Court indicates in forma pauperis is not granted and this is a different proceeding.

The additional paper, ink and postage required to file the same documents are a cost so great in term of costs as to vitiate my access to the courts. The reason why I filed the motion was to avoid the costs the court in bad faith compels me to pay despite the fact it required I filed the motion it denied in bad faith.

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

Going into debt, of even a few dollars, is against my religious belief, and the additional costs of even a few dollars to pay for postage, stamps, ink and paper is a substantial burden upon my access to the courts due to my utter poverty, and my inability to pay back any fees should my appeal fail. . In addition, asking for donations is against my religious beliefs as I believe people are misled to hell by *Matthew* 6:1-4 violations of organized charity, fundraising and pro bono.

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

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

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

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

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

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

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

It is my genuine religious belief charging interest or a fee on money lent or artificial debt is a sin against God, I believe misleading many to hell by indebtedness to the pursuit of money, instead of God. (*Ezekiel* 18:13, "He lends at an interest and takes at a profit. Will such a man live [By live, I believe it means losing eternal life in the second death should he not repent]. He will not! Because he has done all these detestable things, he is put to death; his blood will be on his own head."); (*Deuteronomy* 23:19, "Do not charge your brother interest on money, food, or any other type of loan."); (*Proverbs* 28:8, He who increases his wealth by interest and usury lays it up for one who is kind to the poor.); (*Exodus* 22:25, "If you lend money to one of my people among you who is needy, do not treat it like a business deal; charge no interest."); (*Deuteronomy* 15:2 "This is the manner of remission: Every creditor shall cancel what he has loaned to his neighbor. He is not to collect anything from his neighbor or brother, because the LORD's time of release has been proclaimed.")

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

applicable to the states, and the Equal Protections component of the 5th Amendment applicable to the Federal government, with government support.

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

I appeal the Order of both the Eastern District Court and the Third Circuit refusing to grant ECF access to file before the District Court and the decision not to even docket the order the Amended notice of appeal the District-Court indicated it transmitted to it on its electronic filing receipt below, and seek to prevent the court from causing an obstacle so great as to deny me access to this court and other courts. US Amend I, V.

I am required to exercise my right to petition and appeal within the purview of FRAP R 4, 30 days within the Order to preserve my claims in order not to vitiate my right to religious belief against debt, 1st Amendment right to petition and invocation of the 13th Amendment to prevent needless costs by refiling paper copies by US Postage of my denied Motion for ECF should the case be remanded back to the Appellate Court and ultimately back to the District Court.¹¹

¹¹ On August 24, 2023, the Third Circuit Court and District-Court sought to booby trap me based on the amended order by requiring I expend resources I do not have in the same District Court case 22-45 for a separate appeal case number opened 8/24/23 No. 23-8425 that by filing an amended notice of appeal for case No 22-3372 I sought to avoid from being created as an obstacle so great as to deny me access to this court by preserving my appeal on the record below. Such an appeal in a separate case matter where I would be required to file in forma pauperis motions and other documents would be fruitless, and I am not falling for the trap meant to harm me into running out of resources, time, stamps, paper as to cause me not to appeal by appealing separately. I should not be denied my fundamental rights I seek to preserve on the record by such entrapment by the court, but assert and do not waive my claims with the intent to preserve my rights not extinguish them by losing the rights and resources I sought to preserve by requiring I appeal separately effectively vitiating the rights I appealed to protect. To make the matter

If a District-Court may enter an Order, than I the claimant must be permitted to appeal the Order on the record to preserve my claims to prevent the Court from bad faith causing needless costs in order to create a burden based on my poverty and asserted rights as to deny me access to the courts in my exercise of my First Amendment right to petition to preserve my claim should the case be reopened or this Court remand it back. US Amend I, V, VI.

The original order prevents me from working in the profession of my choice and requires time to fight reciprocal cases. It is against my religious beliefs to go in to debt per the petition to file in forma pauperis I incorporate herein. I assert the 1st and 13th Amendment against involuntary servitude to sin and death in hell. I also invoke my right to access to the courts under the 1st Amendment without disparate treatment in violation of the 5th Amendment based on lack of accommodation due to poverty, religious accommodation, and asserted not waived religious beliefs and assertions against involuntary servitude. US Amend I, V, XIII.

This court must overturn the Eastern District Court's denial of access to electronic filing in order not to deprive me of access to the courts due to poverty creating a burden so great as to vitiate my 1st Amendment right to petition should this order be remanded and not simply vacated.

IX. District-Court violated procedural due process, depriving me of a fair opportunity to be heard with inaccurate public record in violation of the 1st, 5th and 6th, by placing someone else's case on my record and placing my pleadings out of order, and multiple pleadings in one Docket Item sloppily, carelessly with reckless disregard of vitiation of my liberties not merely my licenses, unfairly and denied me Constitutionally sufficient notice on hearing

worse. It looks like counsel would be appointed by the Eastern District of PA, PA ODC on an appeal that is not ripe to determine whether it is frivolous as this Court has not decided to hear or potentially remand the case. The Court threatened PA ODC with sanctions for an appeal that if filed would be frivolous as vitiating the rights I seek to preserve by filing an appeal. I refuse to willfully be booby trapped as I was unwilfully booby trapped previously.

I filed a Motion for a rehearing on denial of the stay DI 12. The District-Court misfiled the exhibits to the Motion for reargument on denial of a stay and other motions including over 2,000 misfiled pages. The items were out of order and some appeared missing. The Court placed another's person's medical exhibits on my docket. So, I filed a letter at DI 13 for corrections. I think the District-Court made some corrections, but other documents appear to be out of order which prejudices me and the appellate courts. This denied me procedural due process of a fair, complete, accurate opportunity to be heard by prejudicing me and this appellate court because the court cannot easily find the documents I referred to in my Motion for a rehearing on the Court's Order denying a stay in the voluminous misfiled exhibits. US Amend V. Gail requested a list to aid in correcting the filings. So, I spent hours over a weekend resending each and every exhibit in order, with a document list outlining the order with the title of each email. I do not have ECF access, but upon information and belief the docket remains a mess.

I filed a Motion before the Third Circuit Court to correct the docket below regarding my Motion for a rehearing on a motion for a stay, since a motion for a stay is required in my case. 3DI-29-34, 3DI-36-41. I am required to show my efforts below in requesting a motion for a reargument on the Court's order denying a stay. I have shown a motion for a stay having been made, the District-Court denied the motion or failed to afford the relief requested by not addressing my Motion for reargument on the Court's Order denying a motion for a stay. See, FRAP Rule 8 (b) and 18 (b), See, DI 6-7, DI 12-24.

The Court below seemed to give up on correcting the docket relating to my motion for a rehearing on the denial of stay and scheduled a hearing. (DI-14) I had a number of outstanding motions. I requested the subject matter of the hearing. I asked the Court what the hearing was

about and indicated my intent to call witnesses should it be on the reciprocal discipline as opposed to a hearing on whether a stay or my other motions was required. The Court evaded responding on the telephone or by email. So, I filed a letter asking for notice. I pled on other issues below including the fact ECF access was not ripe because I had not asked for it at any time prior to the Order dated October 6, 2022 denying ECF rights. So, there are a variety of issues the hearing may have related to. I requested notice of the topic of the hearing in conformity with procedural due process requirements applicable to the Appellee pursuant to the 5th at DI 15. I sent an email to follow up on exhibits and expressing the need to correct them as I assumed the Court would make a determination on outstanding motions I incorporate herein at DI 16.

The Court appeared to ignore that too. On November 3, 2023, I filed 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 me to violate my religious beliefs against debt in exchange for access to the courts in defense of her First Amendment rights. DI-17

On November 3, 2023, I filed 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. DI-18

X The Court exhibited Bad faith misrepresentations to lure me by entrapment into vitiating my rights, with knowledge of my belief I was retired before the District-Court, my 6th Amendment assertion of the right to call witnesses which I was deprived of in

DE, a disability order, poverty and lack of means for research given I documented issues relating to broken computers and lack of means to adequately research and risk of serious harm to health without accommodation in the form of time and a stay given my asserted right to a fair trial and circumstances

The District-Court evaded addressing the outstanding motions and instead set me up in a booby trap by issuing an order requiring I draft a memorandum on why my retirement in PA would not affect my standing in its court. DI-21 I retired from the bar of the state of PA in 2018. (App. I, certificate of retirement) Throughout the proceeding I believed I was retired in the District Court. I averred I was retired before the District Court in my motion and corrected motion for a stay. In pleadings and in emails I noted retired status. I thought I was retired, and became confused.

The District-Court knew I was not retired. The Court knew I was retired in PA since 2018. It pulled that data from the PA web site. The Court knew I believed I was retired before the District Court since I was retired in PA since 2018. I indicated I was retired at the signature line of my pleadings (App J)

The District Court also knew I did not have easy access to transportation to travel to the law library to research. DI-9. I was so poor I rode my bike and did not have access to a vehicle around that time. Even worse my bike got a flat tire. DI-9 (App K)

The District Court knew I was impoverished and could not afford or pay for Lexis or Westlaw too in order to research either.

The District Court knew I was under great duress. I am fighting for my licenses, liberties, life, health and eternal life from the fires of hell. The District Court knew I was having life threatening health issues as I noted I collapsed due to severe dehydration related to a bad surgery I had as a youth. DI-9. (App K) I require time to care for my health in order not to

diminish it or die for the vanity of others. DI-9. I attempted to assert my religious right to live. I alerted the Court to the fact I require time to sustain my health by including my health records and assertions in order not to harm my health or die at App K too. PA ODC did not care that I collapsed at the post office but for his and the Court's denial of a physical accommodation in the form of time in violation of the ADA regarding to physical not mental accommodations.

The Court also knew I desired to subpoena witnesses should the hearing be on discipline. I was not afforded that asserted right to subpoena witnesses in the DE proceeding.

The Court knew I was not retired, but attempted to set me up to fall, which may cause 6 new law suits relating to a new order. At the time I drafted the letter at DI 22, I was fighting for my life and eternal life, not merely my licenses in other cases simultaneously with this case. I believe differently than others. I believe many things lead to certain loss of eternal life in the fires of hell. I do not believe many people go to heaven. Jesus teaches few people have eternal life at the resurrection of the bodies from their graves the last day. *Mathew 7:13-15*. I believe compromising my belief in Jesus for the vanity of men misleads others to hell and may damn me to hell. It is no small matter. I do not want to mislead others or miss out on sharing a fuller type of love with God on judgement day for eternity.

I was utterly confused because Gail indicated I was not retired and I thought I was. Then, I just did not know. The District Court knew I thought I was retired. I stated the same in pleadings. The District Court knew I have been retired from PA since 2018. That was confirmable public knowledge at the time of the Order. Moreover the District Court cited the public state web site. DI 21. The District Court also knew due to lack of time, poverty and limited means of transportation, broken electronics and lack of resources I could not easily research.

Despite that the Court ordered me to draft a memorandum of law as to why my retirement in PA would not retire my license in its Court. DI-21. The Court booby trapped me based on an error of fact, an error of law creating manifest injustice against me by using retirement as a reason to disbar me. In response to the Order for a memorandum, while acting under great duress, I fell into the misleading trap of the Court. I filed a letter asking to be placed on retirement, as not admitted in the Eastern District Court of PA District Court to practice because I was confused as to whether I was retired or not. I thought my assumption of retirement might be wrong, but then the Court asked why I should not be retired. DI-22. To my horror, the Court disbarred me instead of placing me on retirement. DI-23. I was surprised because I thought I would be retired.

I immediately called Gail noting my confusion. I asked if this was punishment. I exclaimed my confusion as I thought I would be placed on retirement. She responded no, it was merely placing my license as disbarred due to retirement, not punishment. Gail Olsen said the Court was not disciplining me, per the letter confirming our conversation at DI-24. Having multiple law suits where Courts sought to discipline me for my faith in Jesus, I drafted a letter confirming our conversation, but remained confused. DI- 24.

At the time, just like now, I was under water in other cases as I fought for my eternal soul from the pits of hell by defending my faith in Jesus Christ from government persecution but for the exercise of religious beliefs. I did not have easy access to research. During the case I could not even afford car insurance and gas and was compelled to hand in my tags since the DE Order and law suits arising from it preventing me from working in the occupation of my choice and I assert my 13th Amendment rights.

After researching I discovered I was not automatically retired since disbarred PA attorneys are not automatically disbarred and may have an office to practice before the Federal courts. *See, Theard v. United States*, 354 U.S. 278, 282 (1957); *Selling v. Radford*, 243 U.S. 46, 49 (1917), *Frazier v. Heebe*, 482 U.S. 641, 648 n.7 (1987); *also see, In re Surrick*, 338 F.3d 224, 231 (3d Cir. 2003), (disbarment by the [s]tate does not result in automatic disbarment by the federal court." *In re Ruffalo*, 390 U.S. 544, 547, 88 S.Ct. 1222, 20 L.Ed.2d 117 (1968)). *Surrick v. Killion*, 449 F.3d 520, 530 (3d Cir. 2006), ("The question in this case is whether a state may prohibit an attorney admitted to the bar of a federal district court, but suspended from the state bar, from maintaining a legal office for the sole purpose of supporting a practice before the federal court.").

Judge Diamond of District-Court booby trapped me by creating the assumption I was retired by asking me to draft a memorandum on why I should not be retired in its court too. Judge Diamond sought to entrap me into requesting retirement in order to disbar me for conduct I would not have otherwise committed but for the trap he laid out to get out of work. I have limited time, resources and ability to research. The Court should not have placed me as disbarred instead of as retired. Moreover it is clear error of law, of fact creating manifest injustice against me to place me on retirement too, even if the order should be changed. I did not have notice of disbarment, and the District-Court had reason to believe I did not understand the consequences of retirement. The District-Court knew I was confused and exploited that confusion to get out of analyzing the voluminous amount of Constitutional issues in the underlying original disciplinary case the reciprocal case is based on. The Orders below violate my 5th Amendment right to notice, and a fair proceeding.

The US Supreme Court held in, *In re Ruffalo*, 390 U.S. 544, 551 (1968), “The charge must be known before the proceedings commence. They become a trap when, after they are underway, the charges are amended on the basis of testimony of the accused. He can then be given no opportunity to expunge the earlier statements and start afresh.” I was not given advance notice on the matter of the hearing or notice of disbarment based on retirement. I was without access to legal resources and under great duress. The court took advantage of my hardship to vitiate my license to practice law in bad faith.

The US Supreme Court indicates in *Herring v. New York*, 422 U.S. 853, 866-867, “Due has long been recognized as assuring “fundamental fairness”... the elements of fairness vary with the circumstances of particular proceedings... What is fair in one set of circumstances may be an act of tyranny in others.” As applied the court acted unjustly creating irreparable injury to me in terms of punishing me even more harshly for the 1st Amendment rights to petition, religious belief, exercise of belief, association and speech and asserted other Constitutional rights including the 6th Amendment right to cross examine my accusers which I alerted the court I reserved my right to do since I was deprived of the right in the original DE Disciplinary proceeding. I asserted my 6th Amendment right to call witnesses.

I did not know the Eastern District Court would disbar me when I did not draft a memorandum as to why retirement in PA would not retire my license in its Court. I asked the Court be placed on retirement so as not to be barred as active, but I thought I might have been wrong on my assumption of retirement. I was confused without ability to research the issue due to lack of time and resources. My conduct was not done knowingly or voluntarily but under great duress. It was a booby trap based on a misunderstanding similar to the entrapped lawyer relating to the disciplinary proceeding in *In re Ruffalo*, where I was denied fair notice and a fair

and fair opportunity to be heard given my unique situation of facing 6 law suits, limited access to the courts given lack of time, health limitations and poverty creating a substantial burden to my access to the courts and religious belief against debt. The Order should be overturned, and my license should be placed on retirement either..

While, I do not have easy access to resources, the District Court should have known retirement in state does not automatically retire my federal license unless specifically drafted in its rules. The rules do not require reciprocal retirement in my case. So, the District Court appears to have set me up to fall which is not fair or just. I gave the court notice I lacked time and resources to investigate. DI-9. I was under duress having noticed the District Court of my collapse upon the floor of the post office due to lack of time to care for my health to sustain it. I noticed the District Court of my lack of resources to pay for car insurance, and my limited resources too.

I did not have the means to research until later. I discovered and realized I must appeal the Eastern District of PA Order or potentially face 6 new law suits. That is important to prevent in order not to certainly vitiate my Constitutional rights. Costs of needless additional law suits are so great given my poverty and religious beliefs against debt as to effectively to deprive me of my ability to petition to defend the loss of Constitutional rights and claims including but not limited to my private 1st Amendment rights 1. to religious belief in Jesus as God not money as God, 2. Exercise of religious belief, petition, speech, association and other claims. US Amend I, V, XIV, XIII.

“The standard of due process is that no one may be deprived of liberty or property without such reasonable notice and hearing as fairness requires.” *Joint Anti-Fascist Refugee Committee v. McGrath*, 341 U.S. 123, 124.

I was deprived of procedural due process by the unfair trap the court laid to entice me to eliminate work caused by its staff's messing up on docketing when the case manager Gail was out and lack of notice and an opportunity to be heard fully and fairly as written on the docket.

The vitiation of my rights not to be deprived of my license but for the entrapment of the court was not knowingly or voluntary given. "Due process must be respected in periods of calm and in times of trouble," even during a global pandemic, war in Ukraine and Israel and global economic crisis. Id

I was not predisposed to violating rules against retirement. "The entrapment defense prohibits the government from instigating a criminal like violation of the disciplinary rules by persons otherwise innocent in order to lure them to its commission and to punish them. I was not predisposed to place my license I thought was on retired by automatic rule of law with the 2018 retirement in PA onto retirement. Justice Diamond set me up with an evil selfish biased motive of person trying to get out of upholding Constitutional rights to get of work which is required to uphold justice for all, even me as a party of one with unique religious beliefs that no one is above the law nor below, even Presidents, judges and law makers. *United States v. Russell*, 411 U.S. 423, 424. I face irreparable injury before the partial forum to itself and its case law instead of the impartial application to the rule of law in violation of my right to an impartial forum. I request acquittal and vacation of the order disbaring me due to retirement.

The Government through the Court, "may not issue commands to its citizens, under criminal [or disciplinary] sanctions, in language so vague and undefined as to afford no fair warning of what conduct might transgress them." *U.S. v. Levin*, 973 F.2d 463, 466 (6th Cir. 1992) *Citing Lanzetta v. State of New Jersey*, 306 U.S. 451 (1939).

The government, the court, lured me in bad faith by trickery to disbar me to get out of work its staff created by misfiling my pleadings. I did not knowingly nor voluntarily relinquish my license to practice law. The court knew or should have known I was confused, and entrapped me in bad faith. Accordingly, the order below must be vacated.

XI. The Courts must be corrected within the purview of the Constitutional limits of a case or controversy without retaliation to parties who seek in good faith to correct the court, which includes not retaliating against me by this petition to cure the defects in this case by the entrapment by Justice Diamond

Injustice results when the courts do business instead of upholding the Constitution which protects the people and their exercise of individual liberties including petitioning the government to correct mistakes and misconduct which is smarter and upholds the rule of law as opposed to lawless lusts such as desire for profit, avoidance of costs, convenience, productivity material gain, profit and such. Compromising what is right for what is profitable creates injustice by making freedoms for sale to only those who can afford to buy the lie of liberty.

Courts violate the Constitutional requirements of Due Process and Equal Protections component of the 5th when it is partial towards itself, the government, convenience, productivity, avoidance of costs, profit under the deception of the common good, welfare of the state, or public good. Parties and attorneys place a check upon judges too to uphold the fair impartial application of the constitution to the rule of law.

I petition to protect constitutional liberties and require the courts to uphold the rule of law, without waiver, not destroy those who administer or who I petition to uphold it, including Justice Diamond.

The Courts must be corrected within the purview of the Constitutional limits of a case or controversy without retaliation to parties who seek in good faith to correct a court's error, which

includes not retaliating against me by this petition to cure the defects in this case by the entrapment by Justice Diamond.

I seek to improve the administration of justice by requiring courts and its staff obey and adhere to the rule of law without sacrificing claimants' interests for the courts' partial whim, which eliminates the impartiality required for fairness under the 5th Amendment procedural due process and Equal protections component based on view point.

The US Supreme Court held "the constitutional principles there applied forbid the judiciary, as well as the legislature, of a State to interfere with the free exercise of religion."

Kreshik v. St. Nicholas Cathedral, 363 U.S. 190 (1960)

The US Supreme Court held "license requirements are struck down only when they affect the 'enjoyment of freedoms which the Constitution guarantees. *See, Staub v. City of Baxley*, 355 U.S. 313, 322 (1958).'" *Lakewood v. Plain Dealer Publishing Co.*, 486 U.S. 750, 777 (1988).

And yet, my license is restricted or eliminated but for my religious beliefs and my petitions to require the courts and its staff adhere to the Constitution as I assert and defend my religious belief in Jesus, not money and material gain as God.

I seek a fair opportunity without willful or voluntary waiver by the substantial burdens this court and other courts have caused upon my exercise of religious beliefs and fundamental rights. RFRA.

"Justice in the courts" is a command by my God. *Amos* 5:15, *Matthew* 23:23.

I do not regret suing former President Trump and seeking to substitute current President Biden by certain conduct that establishes government religion. I am disappointed in the courts for not upholding the Constitution but for violating it, and yet the courts may be made clean by doing what is right now without compromising justice for partial convenience or selfish whims.

XII District-Court violated my asserted first amendment right to petition and 5th Amendment procedural due process by not recusing Judge Scirica from this case, and must recuse him now should this case be remanded back to the District Court

The proceeding involves questions of exceptional importance which to my knowledge have not previously been addressed by any Court. The answers the Court provides may promote the impartiality of the federal courts and preserve the United States from an unnaturally schemed overthrow. The answers may also preserve not only my Constitutional liberties but the Constitutional liberties of the people from the government backed foreign and private partners elimination of all Constitutional protections under the threat of removing the ability of people to buy and sell but for their exercise of religious belief in Jesus's teachings which do not conform to the secular or religious belief of the government, or the government backed foreign of private partners.

The proceeding also involves the important question as to whether anyone with a license to practice law has any First Amendment private freedoms to 1) petition, 2) religious belief, 3) association as a Christian, Catholic, Democrat without removal of the association as a lawyer but for the exercise of the right to petition to safeguard religious beliefs contained in private speech the government finds repugnant, or speech to petition to correct government misconduct or mistakes without retaliation but for the exercise of the 1st Amendment right to petition or 1st Amendment right of speech petitioning the courts for grievances of caused by government misconduct and mistakes based on subject matter making the government above the law and lawyers below the law 4) Private speech outlining my religious beliefs in Jesus as God not money or mammon or professional collective gain as God which is the mark of lawlessness leading to damnation in hell, 5) and other private claims and rights from government infringements and violations of including, but not limited to, Equal Protections under the 5th and 14th, 6th Amendment right to self-represent, claims for a fair trial, claims for a right to pleadings

in a case against me Case Number 541, claims relating to a conspiracy under 1985 to cause me to forgo *Kelly v Trump* by Delaware supreme Court incited witnesses intimidation, threats, concealing evidence by sealing evidence in my favor to cover up procedural due process and misconduct by the state court, preventing my ability to call witnesses by ignoring my motions where I assert the right to self-represent, to perform discovery, scheduling the hearing within fewer days required to subpoena witnesses 8 days as opposed to 10 required by the state disciplinary rules and other harm such as firing two court staff to conceal evidence necessary to my defense, the reciprocal proceedings and this case, and other claims.

Per 3DI56 attached hereto and incorporated herein shows my petitions in *Kelly v Trump* were sealed by the Court to prejudice my appeal to the USSC, and to conceal evidence in my favor in the disciplinary proceedings and this civil rights case in violation of my right to a fair trial, notice and an opportunity to be heard and my First Amendment right to petition against the Delaware Courts' conspiracy to threaten me by inciting attacks against me to cause me to forgo my case against Former President Trump and current President Biden to alleviate a substantial burden upon my religious exercise caused by their establishment of government religion based on barter or exchange not freedom, making our rights for sale to be exercised by only those who may legally barter the government through its private or foreign partners to exercise. US Amend I, XIV.

My Reply to the ODC's response to my objections to the Board's determination, my appellate brief, Objections, and Answers incorporated herein by reference to the dockets or as attached hereto in 3DI-56. These exhibits show Constitutional violations and aver facts if taken in the light most favorable to me show evidence the DE Supreme Court incited the violations of my first Amendment right to petition, violations against witness tampering, reckless or

intentional infliction of emotional distress and bodily harm, procedural due process violations in Kelly v Trump and procedural due process violations in the Disciplinary proceeding making the DE Supreme Court the judge and jury, and other claims.

Per the attached April 26 letter, along with two DE Disciplinary Motions where I aver Constitutional violations of by adherence to the disciplinary rules, the Supreme Court showed it colluded in bringing the disciplinary petition by copying the Disciplinary Board on a letter providing me with the waiver of notary requirements in the pandemic. The Delaware Supreme Court incited the collusion to violate my right to petition in Kelly v Trump and to punish me for my belief in Jesus by sending its arms to attack me. The information the arms used in their attacks were only in the possession of the DE Supreme Court, including but not limited to my private petition for an exemption of bar fees I ended up paying. The Delaware Supreme Court referred to a case in its disciplinary opinion of the requirement of exemptions of bar fees in its order unnecessarily showing its disdain for my petitions for an exemption on bar fees for all attorneys facing hardship. The State Court cared more serving partial business and money not individuals and individual Constitutional liberties in violation of US Amend I, XIV, XIII. As a Christian I believe this is the type of lawless lusts serving material gain at the cost of human sacrifice of life or liberty will damn each justice to hell under the color of law should they not repent with the help of court correction. The lawless partiality to cover up its own misconduct to serve the mere appearance of justice while committing lawlessness will allow more lawlessness to fester and spread should judges remain above the law instead of under the law within the purview of the constitutional limits of 1. Cases and controversies such as mine and 2. Impeachment.

I have religious beliefs against partiality by the government.

The State Board's and federal disciplinary panel's function as a group of professionals serving the professionals' interests by making justice a business as opposed to a matter of truth as a matter of law regardless as to whether citizens are poor and have nothing to barter with violates my religious belief, as applied, Equal protections and Due process, as applied and per se.

I believe government partiality towards business and interest groups is sin. (See, *Isaiah* 10:1-3). That is why I sued the democrats and asked for a waiver from filing requirements.

Just like I do not want to go to hell for favoritism, I do not want judges to go to hell based on partiality to those who serve their seats, or who may take them away by judicial discipline, nor do I desire the courts to be placed in a position of temptation to violate the rights of those they serve.

Judge Scirica has a conflict of interest with my case I was not aware of until after June 3, 2023.

I moved to recuse him pursuant to my 5th Amendment right to a fair trial to defend the exercise of my private 1st Amendment rights of petitioning, speech, religious belief, exercise, and association, 28 U.S. Code §§ 144 and 455, 29 CFR § 2200.68.

Judge Scirica chairs the Committee on Judicial Conduct and Disability.

I contest the federal judicial disciplinary rules Judge Scirica drafts on Constitutional grounds. I oppose the elimination of life time limits and believe district court and Circuit Court judges should have life time appointments to prevent them from the temptation to normalize injustice by partiality to the Disciplinary rules as opposed to the preempting Constitutional application of the law. I declared my belief regulating the Court violates the constitutional rights of citizens the court serves and allows for the schemed overthrow to occur in the District Court prior to discovering the conflict. Favoritism towards those who serve the alleged

professions' collective convenience, productivity or the individual judge's future or current seat or highly esteemed position creates unfair proceedings when conflicts arise. I seek to declare the disciplinary rules Judge Scirica Drafts are unlawful.

The fact I argued on the record below and in other records including the original disciplinary law suit and other cases, my desire to eliminate or prevent disciplinary rules of federal judges and the United States Supreme Court creates a conflict of interest. The appearance of a conflict requires a recusal and a new panel who is not swayed by Judge's Brilliant mind and perceived expertise in a subject I disagree.

I sought to amend my complaint in the civil rights case to include Constitutional arguments against the disciplinary rules and proceedings against attorneys.

I oppose attorney self-regulation and third-party professional regulation through professional boards on Constitutional grounds, on religious grounds and on grounds the rules violate the Constitution. Standardized compelled practice eliminates free will needed to protect Constitutional freedoms of clients and professionals who do not conform to the standards. Standards makes professional practices above the law by deference of the courts to the standards even when such standards harm, oppress, kill, steal and destroy human life and health for the bottom line. The standards create partiality to profit, productivity not justice.

The state proceeding and state disciplinary rules reflect the rules Judge Scirica works on in his capacity as Chair of the federal disciplinary rules. I should be afforded the right to assert my right to include reasons why the state and federal disciplinary rules violate the Constitution before an impartial forum, as opposed to a Judge who supports disciplinary rules by actively drafting rules for disciplinary proceedings.

Judge Scirica privately opposes my view due to his stakeholder interest he has in upholding rules that mirror his work. This conflict of interest violates my procedural due process rights and Equal Protections rights as applied, as a party of one with unique religious-political beliefs in unbiased justice as a religious command by God.

I believe there is an attack on judges to eliminate the judiciary to eliminate the rule of law, as I mentioned previously.

I believe the courts must limit the purview of correcting federal judges to the purview of the Constitutional limits without waiver, 1. Cases and controversies such as mine, 2. or impeachment, to preserve these United States from schemed overthrow. Allow attorneys to fulfill their duty by requiring in cases that judges do not vitiate Constitutional rights for business. The judiciary has a duty to uphold and not violate the Constitution in order to adhere to less important interests such as appearance to the mob or fickle fads. *Salazar v. Buono*, 559 U.S. 700, 717 (2010).

Judges' loyalty to Boards and regulators, even self-regulation must not supersede the Constitution to create actual injustice not mere the appearance.

I believe regulations will be used to assist the other two branches to exceed the Constitutional limits to impeach and control a no longer free, independent and impartial judiciary. I believe this will be used to eliminate the courts down the line if left unstopped.

Upon information and belief there is not only a schemed overthrow of our economic system but there is also an unnatural, man-made designed overthrow and elimination of governments to allow entities who control the resources through technology to enslave the population to live based on their whim with no restraint in the form of law to prevent their oppressing, killing, sealing and destroying liberty and human life.

I informed the courts of belief lobbyists scheme to eliminate people judges and people lawyers to eliminate the rule of law at both the World Government Summit (“WGS”) and the World Economic Forum (“WEF”). Speaker Sebastian Thrun at the WGS mentioned lawyers and judges would be replaced by automation at Day 2 of WGS in 2018 you may see on youtube by clicking:

<https://www.youtube.com/watch?v=NsdmPiBc9TI>

Also see the attached exhibits in the agenda to eliminate people judges where it appears villains who receive unjust gains through banking, grants, charities and government contracts seek to cover up the fact there is no money to pay out for the boomers for their eared retirement, healthcare and social security. The manner money is coined enslaves the people to debt in violation of my religious belief against debt which I believe damns people to hell. I proposed a way to coin correctly without violating my 1st Amendment exercise of religious belief as applied or the 13th Amendment as applied to all by enslaving the masses to pay the Central and other banks back for the money the government grants and contracts money with interest.

Attached hereto in the appendix the Agenda to eliminate people judges, I provide an article where a lobbyists boldly stated:

“How can the use of Laws be eliminated? Today we try to control human behavior by enacting laws or signing treaties without changing the physical conditions responsible for aberrant behavior. When Earth’s resources are seen as the common heritage of all people, irrelevant laws and social contracts will vanish. In a resource-based economy, social responsibility would not be a function of artificial laws or force.”

I understand the plan is to control the resources people require to live to control a no longer free people’s behavior to bend to the dictates of those who control the technology and resources required for life. The scheme is to control the government by controlling the resources for it to function before eliminating the need of government to govern and guide.

Professional control through standardized discipline of professionals allows for the schemed government overthrow to take place by allowing professional practices and business to supersede Constitutional laws, making business above the law, unchecked by the courts or government via the governments backing of it.

I believe the courts are in trouble. Allowing cases like mine to show judges are not above the law but may be corrected within the purview of the Constitutional limits will prevent the overthrow should I persuade the courts regulating the judiciary creates injustice and should be deemed unconstitutional.

Judges must not waive the 5th Amendment against self-incrimination by allowing self-regulation or Board regulations because they eliminate the 5th Amendment right to Equal protections of claimants' they serve by the temptation of judges to be partial towards disciplinary rules which may conflict with the Constitutional application of the rule of law

Judicial disciplinary rules also will likely allow ex post facto activity to create cases against Judges to allow congress to more easily impeach judges or create a horse and pony show and mockery of justice by hanging judges they disagree with based on fickle fads. My God teaches impartiality is a command. I must protect the court, even when I disagree with them.

Please see the attached article showing there are automated peopleless courts in China. Please see some excerpts from the WEF books, including the note of eliminating the job of attorneys by 2027 or so. This is real life. I read information by those I disagree with to understand their plans.

The issue of whether the practice of law should be regulated within the purview of the Constitution so as not to prejudice the public by creating injustice by partiality to serve ourselves may very well save the courts from a very real planned overthrow. The attacks against the US

Supreme Court are not normal. They are hypocritical since the Congress and the President commit the same acts unashamed. I have religious beliefs against partiality. Regulating professionals and the courts through disciplinary proceedings guarantees injustice by chilling attorneys' duty to require judges adhere to the rule of law without vindictive retaliation based on court correction needed to preserve the judiciary and the government.

Under objective standards in my case, "the probability of actual bias on the part of the judge or decisionmaker is too high to be constitutionally tolerable." Citing, *Rippo v. Baker*, 137 S. Ct. 905, 907 (2017), Citing *Withrow v. Larkin*, 421 U.S. 35, 47 (1975); *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868, 872 (2009)). "The Tumey Court concluded that the Due Process Clause incorporated the common-law rule that a judge must recuse himself when he has "a direct, personal, substantial, pecuniary interest" in a case. Ibi" *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868, 876 (2009). In this matter, Judge Scirica's personal interest in opposition to my claims is too prejudicial to my case to afford me a fair proceeding. US Amend I, V.

"“A fair trial in a fair tribunal is a basic requirement of due process.”*Murchison, supra*, at 136, 75 S.Ct. 623” *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868, 876 (2009). The Court cannot grant a fair proceeding with Judge Scirica's participation.

"The Court asks not whether a judge harbors an actual, subjective bias, but instead whether, as an objective matter, the average judge in his position is likely to be neutral, or whether there is an unconstitutional potential for bias" *Williams v. Pennsylvania*, 579 U.S. —, —, 136 S.Ct. 1899, 1905, 195 L.Ed.2d 132 (2016) (" (internal quotation marks omitted))."); *See, Rippo v. Baker*, 137 S. Ct. 905, 907 (2017) ("we did not hold that a litigant must show as a matter of course that a judge was "actually biased in [the litigant's] case")

Judge Scirica Chairs the Federal Discipline rules for judges. I seek to prevent regulation of the US Supreme Court, federal judges and seek to overturn lawyer disciplinary proceedings and rules that mirror the rules Judge Scirica works on. An objective person would deem Judge Scirica's participation unfair to me under the unique facts of this case.

Justice Scirica's participation violates due process. This court must vacate the order below and recuse him should this case be remanded back to the District-Court to prevent further deprivation of procedural due process. US Amend V.

XIII The Court erred as a matter of law, as a matter of fact creating manifest injustice against me in denying the recusal of the Judge Phipps in my case/ So, the Order must be overturned as a deprivation of Procedural Due Process

The failure to recuse Judge Phipps ("Phipps") deprives me of a fair opportunity to be heard in violation of my 5th Amendment procedural due process rights requiring Phipps's orders to be overturned, including the denial of a stay which would vitiate the dismissal for failure to prosecute.

I am being disciplined for suing President Trump to dissolve the establishment of government religion. Phipps was included as a potential nominee twice by President Trump to be placed on the list of candidates to become US Supreme Court Justice. Trump will likely be the next President and nominate Phipps again should a justice retire as one may be pressured to do by abnormal attacks by lobbyists pressuring Congress to impeach or regulate the courts.

Phipps ruled against me in the Civil rights case based on the state's false and misleading allegations. The false claims and misleading allegations of the State unbacked by the record allow witnesses to testify in Phipps's head without affording me an opportunity to cross examine in the Eastern District case.

Phipps's has a conflict of interest that would tempt the common man to partiality to rule against me and effectively for Trump to gain a seat at the most powerful place the US Supreme Court.

The Third Circuit committed an abuse of discretion in denying recusal of Phipps by an impartial panel. Judge Phipps is on the panel of all orders denying me relief rendering me an unfair biased proceeding.

Judge Phipp's participation violated my right to a fair trial by creating the actual prejudice I sought to avoid. An objective observer would deem the temptation for Phipps to be biased towards his own self interest and likely nomination as a United States Supreme Court Judge, with partiality towards Trump and against me is too great and unfair under Procedural due process. I am being disciplined for suing President Trump, the one who may reward Judge Phipps.

Further, per the tv news video, newspaper articles and reference in my attached civil rights case, I averred I was previously retaliated against by a Christian law school Duquesne for petitioning the school to eliminate its rat problem. Phipps taught at this school and is loyal and partial to it and those within it or connected to Duquesne School of law, who I arguably esteem too including Judge Thomas Hardiman, my schoolmate District Court Hudge Bill Stickman, and President Gormely, my former Constitutional law professor. So, Phipp's is tempted to be biased against me for other additional reasons to serve those who serve or support his position which unfairly conflict with my petitions.

To my horror, Judge Phipps participated in 5 judgments against me at Third Docket Item Number ("3DI") 3DI-47, which provided:

“Present: SHWARTZ, MATEY and PHIPPS, Circuit Judges

1. Unopposed Motion by Appellant Meghan M. Kelly to Vacate order dated 05/19/2023;
2. Unopposed Motion by Appellant to Amend Correct Motion to Vacate to Include Pursuant to Fed. R. App. Proc R 27(b) and Rule 40;
3. Motion by Appellant to for Leave to Exceed Word Limit for Corrected Motion to Vacate Order dated May 19, 2023;
4. Motion by Appellant to Correct the Record, Specifically District Court Docket Item, DI 12 under Rule 10 (e)(2)(c) and Rule 27;
5. Motion by Appellant for Extension of Time to File Brief and Appendix for 120 Days to appeal the lower court's order placing license on disbarred as retired but for religious beliefs, religious political beliefs, and religious political speech contained in petitions;
6. Motion by Appellant Meghan M. Kelly to stay of this proceeding including briefing, with the allowance of 30 additional days, when the stay is lifted at the conclusion of case 21-3198.

The motion to exceed word limit is GRANTED. The motion to correct the record is DISMISSED. All other foregoing motions are DENIED.”

My motion to recuse Judge Phipps was denied on June 20, 2030.

I was taken by surprise, given the notice of my legitimate concern that Judge Phipps’ acting as a member of the panel actually granting an adverse decision based on actual prejudice relating to a conflict of interest so great as to tempt the common person to rule against me as he did.

6/4/23 I filed the following documents that I incorporate in their entirety, including exhibits:

1. Appellant Meghan Kelly’s motion for reconsideration of Order Dated June 20, 2023 denying the recusal of Judge Phipps and Judge Scirica and Pursuant to FRAP Rule 2 for a new panel to re-consider motions denied by this Court on June 30, 2023

2. Petitioner Meghan Kelly Affidavit in Support of Recusal of Judge Phipps, and Judge Scirica
3. Appellant Respondent Meghan Kelly's Motion for leave to exceed the word and page limit in her motion for reconsideration of Order Dated June 20, 2023 denying the recusal of Judge Phipps and Judge Scirica and Pursuant to FRAP Rule 2 for a new panel to re-consider motions denied by this Court on June 30, 2023

On July 5, 2023 I filed Motion to Expedite Consideration of Appellant Meghan Kelly's motion for reconsideration of Order Dated June 20, 2023 denying the recusal of Judge Phipps and Judge Scirica and Pursuant to FRAP Rule 2 for a new panel to re-consider motions denied by this Court on June 30, 2023

The denial of Phipps violated my right to a fair and impartial forum under basic norms of procedural due process and created actual prejudice against me. US Amend V. The "Federal Rules of Civil Procedure treat orders that are entered without due process as void, permitting reopening of the case. U.S.C.A. Const. Amend. 5; Fed.Rules Civ.Proc.Rule 60(b)(4).

The panel's inclusion of Judge Scarica and Phipps violates Due process and must be rendered void under the facts of this case. US Amend I, V.

I further argue that legislators may not legislate and regulate the Federal Judiciary as violative of separation of powers.

This Christmas my laptop stopped working. I had to piece together things arguments based on what I had on memory sticks. There is case law indicated the courts may not be regulated by the legislator albeit it was from a lower state court if I recall correctly.

Nevertheless, this brief is due tomorrow. So, I assert Congress violates separation of power issues by enacting 28 U.S. Code § 144, 28 U.S. Code § 455, 29 CFR § 2200.68, or other regulatory or disciplinary rule or requiring self-regulations by creating the danger of the deception manipulated marketed by third party distortion of appearance to commandeer the court

without a case or controversy which pressures the court to be concerned with the deception of appearance instead of actual justice. Constitutional requirements of Procedural Due process and Equal Protections arguments are sufficient to require recusal of judges or to overturn decisions based on unfair partial participants of the court which the appellate court, and the entire forum wherein a party requests recusal must determine whether the failure to recuse makes the proceeding constitutionally defective.

It is unfair for a judge to determine whether he or she is biased in a case. There is a temptation to truly believe we are above temptation to give into self-interests. It is quite unfair for a judge to be forced to confess this.

It is more fair and just to have an impartial full court or panel not the person attacked as partial to decide these matters.

With regards to recusal demand of Justice Thomas, I do not think that is fair or just given half the nation supported Trump. Judges are allowed to have individual beliefs. They are not allowed to create case law partial towards personal self-interests instead of the impartial application of the rule of law. Do I think he should be recused no. Do I think he will be impeached wrongly if the courts do not draw the line to say what the law is. Yes. There is an agenda to eliminate this court. I am not mentally disabled because I care, even for this I disagree with.

Whether this court agrees or disagrees with me is not as important as whether this court says what the rule of law is per Marbury. This case or the civil rights case may be the only opportunity to do so in an actual case and controversy where this court has authority and power

to do so. You will not have a say if there is a constitutional crisis by compelled disciplinary proceeding before non-article III disciplinary forums that are unfair.

Further, in *Wisconsin Dept. of Industry v. Gould Inc.*, 475 U.S. 282 (1986), the US Supreme Court held that federal statutory or regulatory law, specifically NLRA preempted the state disbarment statute. Thus, an argument may be made that the Constitutional law including the right to petition, opportunity to receive notice on disbarment and the 5th Amendment should preempt disbarment statutes or rules too.

I argue the Disciplinary proceedings and rules are Unconstitutional for many reasons too voluminous to expand upon now. The record in the DE Civil rights case contains many of my arguments, though I did not have time or room to include them in my Oct. 18, 2023 appeal of that case before this court.

XIV. The system of reciprocity violates Case and Controversy Requirements

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.

In federal reciprocity cases, the District-Court who is both the prosecutor and the judge is the named party in this case. I am defending myself against required Court prosecution where I, the accused bear the burden by clear and convincing evidence as to why the Court must not prosecute me, in potential violation of my Fifth Amendment rights by reporting requirements and fair notions of due process and procedural due process applicable to federal courts.

The Third Circuit held,

“The existence of a case or controversy requires: (1) a legal controversy that is real and not hypothetical; (2) a legal controversy that affects an individual in a concrete manner so as to provide the factual predicate for reasoned adjudication; and (3) a legal controversy with sufficiently adverse parties so as to sharpen the issues for judicial resolution. *Rendell v. Rumsfeld*, 484 F.3d 236 (3d Cir. 2007)

The Third element is not met in all cases before federal disciplinary hearings. There is no adversarial party when the entity prosecuting is judge and jury, including mine. This system of 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 be considered by an impartial judicial forum who has not reciprocated discipline, by this US Supreme Court. A federal court, District-Court will not admit it violates the Constitution by blindly adhering to its internal procedures. This Court must, in the interest of justice, consider these important issues.

A. The case and controversy requirements are not met in my case.

There arguably is no controversy in my case, just a cover up of court misconduct, elimination of witnesses, the wrongful removal of four public documents material to my defense from public records, and government persecution towards me, but for my First Amendment exercise of or assertion of my protected Constitutional rights

The record shows, I do not intend to practice law before the District-Court 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. Nevertheless, the infringement upon my license in the District-Court prevents me from the chance to regain employment as a real estate lawyer with my former law firm.

There is no harm to the District-Court showing a case or controversy.

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.

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.

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.

The State 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.

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 including my asserted religious right to live by accommodations that harmed my health due to harmful healthcare, 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 government 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 reserved this issue for appeal in the DE matter, but the US Supreme Court denied me access to its own court by delays in docketing my case.

Whether Constitutional protections are violated by the reciprocity system is a more important issue than mere appearance, and productivity, in terms of material gain for professions or businesses, at the cost of sacrificing freedoms.

The Courts, as government servants, work for justice, not money. If government judges, law makers and presidents care more about money and draft, enforce, and uphold rules that violate the more important Constitutional laws, than none of us are free.

If money is the law, then the people are slaves to the government by artificially indebtedness, under the guise of freedom.

I have a duty to uphold the Constitutional laws that protect something more precious than all the money in the world, individual liberty from government incited private or public economic, physical or social burdens upon, but for the exercise of such Constitutional rights.

This Court's duty to uphold the same is even more stringent. The Constitution protects me, from the Government, including the United States Supreme Court, from persecuting me for the exercise of my fundamental rights.

Sameness is not fairness. Respecting people's individual liberty to believe, think, associate, live, exercise belief, and rights by the dictates of their conscience, no matter if it does not conform to the majority is a duty of this court.

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.

The government's duty is to care for people, while protecting the people's freedom, not control and exploit the people for material gain and productivity, under the guise of order and improving the man-made-unnatural economy.

The issues relating to government compelled self-incrimination by the reporting requirements and the case and controversy issues are capable of repetition, yet, evading review. This Court must in the interest of justice consider these Constitutional issues. Otherwise, no other Court may and violations of freedom for the convenience of the government backed private business partners will continue into infinity, sacrificing humans for business greed, not good.

XV The Third Circuit abused its discretion in denying a stay until conclusion of the civil rights case

I seek to overturn a denial of a stay and the denial of time which vitiates my fair opportunity to petition in the Eastern District of PA case to effectively defend my licenses and my exercise of fundamental rights in the case below and in the civil rights.

The Court erred as a matter of law, as a matter of fact by denying a stay of this case pending the outcome of the civil rights case to allow me a fair opportunity to Petition in this case and access to another court the District Court in the civil rights case.

I potentially face 6 new law suits if I do not overturn the case below or the court merely places my licenses on inactive disabled. I do not have the resources to fight multiple law suits while fighting the most important law suit the civil rights case in order that Constitutional freedoms are not forever vitiated but for my religious belief in Jesus.

That is important to prevent in order not to certainly vitiate my access to the courts and the Constitutional rights I seek to preserve due to costs of needless additional law suits are so great given my poverty and religious beliefs against debt as to effectively to deprive me of my ability to petition to defend the loss of Constitutional rights and claims including but not limited to my private 1st Amendment rights 1. to religious belief in Jesus as God not money as God, 2. Exercise of religious belief, petition, speech, association and other claims. US Amend I, V, XIV, XIII.

I need a stay until the civil rights proceeding is concluded in order to have a fair opportunity to petition. It is in the interest of the courts and the public to allow a stay. I do not think this court or other courts desire to waste judicial resources by additional needless cases

which may be voided should the original case be deemed void for which this reciprocal case arises. I face the irreparable injury in terms of loss of health, life, constitutional liberties and eternal life. This court is apprised of my health requirements I asserted in order not to harm my health or die for sinful vanity and wicked convenience of mere men.

It is not fair that I must pick and choose which cases to defend since poverty creates a substantial burden upon my access to other courts. My religious beliefs against debt also creates an obstacle to my access to the courts. I believe debt damns people to hell by tempting them to make the pursuit of money instead of pursuit of God and God's will savior. I also invoked and continue to invoke the 13th Amendment against involuntary servitude to work for money to pay off government compelled debt to defend Constitutional liberties.

I have a good argument to overturn the original disciplinary case in the civil rights case. Additionally, I have many other claims for additional constitutional violations and claims for relief I make in good faith I should not be deprived of petitioning for but for government pressure to forcefully prevent my 1st Amendment access to the courts, including other courts fairly. US Amend I, V, XIV.

I need a stay in order to adequately and fairly in this case, potential additional reciprocal cases and the civil rights case. The Civil rights case is most important.

There is clear error of fact, of law, creating manifest injustice in the Courts below denying a stay. The Eastern District Court abused its discretion based on a misunderstanding. The disbarment was not freely and voluntarily rendered. I was subjected to coercion and duress and I was not fully aware of the implications of submitting a letter regarding retirement. I was confused as to whether I was retired and the Court booby trapped me based on my known

confusion. Nevertheless, I face the risk of additional law suits, which interfere with access to current law suits.

A stay is required to allow me a fair and adequate focused amount of time to petition in other cases, including one outstanding disciplinary case which did the right thing by granting a stay in effect, the Delaware District Court so as not to vitiate the only impartial forum to assert my claims.

A stay is also required to give me a fighting chance in the civil rights case relating to this matter *Kelly v Swartz*. Denying a stay would deny me the First Amendment right to petition and the 5th Amendment fair opportunity to be heard in the civil rights case, without any important justification necessary to uphold a compelling interest somehow more important than my exercise of the First Amendment right to petition to safeguard the exercise of fundamental rights and other interests in another case.

On or about October 25, 2021, I filed a Civil rights case in the Delaware District Court, *Kelly v Swartz* for First Amendment violations, procedural due process violations, emotional distress, retaliation, witness tampering, defamation, and other claims relating to the State of Delaware's attacks in interference of *Kelly v Trump*, and retaliation for the exercise of my Constitutional rights, based on religious-political-poverty animus to punish cover up the state's violations of procedural due process and other laws ("civil rights").

I amended the civil rights complaint to include Delaware Supreme Court, and its members since it appeared it incited the attacks against me during *Kelly v Trump* to cause me to forgo my lawsuit based on the information of the attackers the State-Arms DE-Lapp and an agent of the ODC Judge of Court of Common Pleas, Kenneth S. Clark.

I also moved to amend the civil rights complaint once as a matter of right to include procedural due process violations, First Amendment violations, Equal Protections violations, 6th Amendment violations and other claims and injuries such as emotional duress that arose during the Delaware Disciplinary law suit.

Since then, I've moved to withdraw the amended complaint the DE District Court did not rule on, and moved to amend the complaint once as a matter of right, when the case is remanded back to the court at once with all of the new and additional claims, facts and information to prevent manifest injustice.

The law suit originally had about 9 Defendants. I intend to add the 5 DE Supreme Court members who incited the attacks against me in interference of *Kelly v Trump*, which may make up to 14 Defendants. Some of whom are brilliant researched, experienced judges.

The members sealed my pleadings where I alleged the state and the DE Supreme Court violated procedural due process protections. The DE Supreme Court participated in firing two material witnesses, Chancery Court Staff. DI 10-12 The DE Supreme Court prevented my requests for discovery and rejected my attempts to subpoena witnesses by rushing the Delaware Disciplinary hearing with fewer days required to subpoena them 8 days as opposed to ten required to call witnesses to conceal its own bad faith. Id. The Court sealed pleadings and concealed witnesses I sought to examine before the Board proceeding to cover up its misconduct. Id. The members of the Delaware Supreme Court intentionally sought to prejudice the DE disciplinary proceeding by obstructing access to material information in my favor necessary to my defense on the original Delaware Disciplinary proceeding.

The Civil rights case is now ripe to appeal before the US Supreme Court, *Kelly v Swartz*.

The State labels my religious belief contained in my speech in my petitions to be a disability. The United States Supreme Court held in *Trinity Lutheran Church of Columbia, Inc. v. Comer*, 137 S. Ct. 2012, 2019 (2017); “The Free Exercise Clause “protect[s] religious observers against **unequal treatment**” and subjects to the strictest scrutiny laws that **target the religious** for ‘**special disabilities**’ based on their “**religious status**.” Citing *Church of Lukumi Babalu Aye, Inc. v. Hialeah*, 508 U.S. 520, 533, (1993); (“In *McDaniel v. Paty*, 435 U.S. 618 (1978), “for example, we invalidated a state law that disqualified members of the clergy from holding certain public offices, because it “impose[d] **special disabilities** on the basis of . . . **religious status**.”

The State Court applies discipline in an unconstitutional manner while treating other attorneys who exercised the same rights for which I am punished more favorably without state discipline so long as they align with the government’s belief in money and material gain.

I have been selectively targeted based on subject matter of speech contained in my petitions, without a compelling state interest more important than the protection of my Constitutional rights, which if left unprotected makes other professionals no longer free under the threat of government retaliation.

The object of the application of the state’s discipline is to “infringe upon or restrict [my] practices because of their religious motivation, the law is not neutral,” as violating the Equal Protections clause as applied to me a party of one. *Lukumi Babalu Aye, Inc. v. City of Hialeah*, 508 U.S. 520, 533-534 (1993), US Amend I, XIV.

The United States Supreme Court held in *Church of the Lukumi Babalu Aye, Inc. v. City of Hialeah*, 508 U.S. 520, 543, 546, 561 (1993),

“The principle that government, in pursuit of legitimate interests, cannot in a [selective manner impose burdens only on conduct motivated by religious belief] is essential to the protection of the rights guaranteed by the Free Exercise Clause. ...A law [as applied to me as a party of one] burdening religious practice that is not neutral or not of general application must undergo the most rigorous of scrutiny. To satisfy the commands of the First Amendment, a law restrictive of religious practice must advance ""interests of the highest order,"" and must be narrowly tailored in pursuit of those interests....A law that is religion neutral on its face or in its purpose may lack neutrality in its effect by forbidding something that religion requires or requiring something that religion forbids. ” Church of the Lukumi Babalu Aye, Inc. v. City of Hialeah, 508 U.S. 520, 561 (1993)

The Civil rights case is the only forum where I may seek relief.

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

XV The Third Circuit abused its discretion denying a stay effectively vitiating my Constitutional right to petition to defend Constitutional rights that are vitiated by the draconian order with the severest consequences

The Third Circuit denied a stay on June 30, 2023, and denied my motion for a rehearing on a stay on July 26, 2023 erring as a matter of law, as a matter of fact creating manifest injustice against me as to cause me to lose my First Amendment right to petition fairly pursuant to the 5th Amendment to defend my exercise of my 1st Amendment right to religious belief, speech, association and petition without loss of my license to practice law but for the state’s religious-political poverty animus. In the interest of justice for good cause to prevent irreparable this court must overturn the Order below and grant me a stay so as not to deny me a fighting chance to assert my rights in the only forum where relief may be had the civil rights case, to prevent 6 needless law suits and to prevent irreparable loss not only in terms of loss of licenses, claims, harm to health but loss of my First Amendment right to religious belief in Jesus without

government persecution, but for my belief in Jesus as God and savior not money as well as violation of other Constitutional liberties. Citing Matthew 6:24.

I request a stay of a determination of this US Supreme Court case too, should a petition be granted.

This Court must grant me a stay because denying a stay is essentially denying me the First Amendment right to petition in the civil rights case given my poverty, religious beliefs against debt, invocation of the 13th Amendment, limited amounts of stamps, paper, ink as to create access to research as to deny me access to the courts. It may be an impossibility to fight up to 14 defendants should this court not give me a fighting chance under the circumstances by granting a stay.

My health has diminished. A stay would grant me an opportunity to hydrate and restore my health. I am a little scared since I previously lost vision in my left eye. I am at high risk for a retinal detachment which causes permanent blindness if not addressed immediately. I require time in the amount a stay may afford to prevent blindness and to care for my health please.

I face irreparable injury should a stay be denied in terms of unconstitutional loss of my property interest in my licenses to practice law, loss of my fundamental rights and other injuries.

The public also faces a great loss making those within the government above the law, and those who hold licenses below the Constitutional law's protections under the threat of similar retaliation which would restrain their licenses to buy and sell but for the exercise of fundamental private rights.

The public is not harmed by a stay. I am not licensed before the District-Court at this time, and am not practicing law on behalf of another. However, the public may be harmed

should a stay be denied by punishing professionals for upholding the constitutional limits against state and actors, chilling correction needed to safeguard fundamental rights for all. The Appellee is not harmed by a stay. The Courts are not harmed by a stay, but may be harmed by a denial which may cause up to 6 additional needless law suits. The balance of the equities shows a stay is required to prevent manifest injustice and loss of my private First Amendment right to petition to defend the exercise of fundamental rights in the civil rights case.

The Third Circuit abused its discretion by denying my Motion for a stay until a final non-appealable decision is made in the civil rights case.

I respectfully request this Court pursuant to Supreme Court Rule 23 order this case stayed before the US Supreme Court should the petition be granted pending a final outcome in the civil rights case which is based on the same subject matter. In the alternative, I request this Court grant a stay should this case be remanded below pending a determination in the civil rights case.

The balance of the equities and case law regarding parallel proceedings show the Third Circuit Court committed clear error of law, clear error of fact, creating manifest injustice against me. I am not practicing law. I am acting as a private person standing up for my right to live, exercise First Amendment private speech, First Amendment private religious belief, First Amendment private exercise of religious belief, First Amendment right to association, First Amendment private exercise of the right to petition without government persecution, but for the exercise of my First Amendment rights, no matter if the State finds my belief in Jesus Christ illogical. It is not for the state to dictate who or what I worship, and my God teaches you can serve God and money. Do not seek material things what you will eat or what you will drink, seek the kingdom of God. (*Citing, Bible, Matthew 6:24-34*).

XVI. EXTRAORDINARY CIRCUMSTANCES WARRANT A STAY

Extraordinary circumstances warrant a stay. The Third Circuit abused its discretion in bad faith by denying my Motion to stay the proceeding and my motion for a rehearing for a stay, and the resulting dismissal Order filed as a result of the denial of a stay under the circumstances creating certain irreparable injury in terms of loss of fundamental rights, especially my Constitutionally protected 1st Amendment liberty to exercise my religious-belief in Jesus, by loss of the right to petition them should this court not overturn denying a stay, which would effectively vitiate the dismissal.

On 6/30/23 the Third Circuit Court entered 7 judgments against me near closing time on the 4th of July holiday weekend in this matter and the civil rights case, Kelly v Swartz. The denial of a stay, and a denial of more time caused the Clerk to file an Order dismissing the case immediately for failure to prosecute in the other case.

On 6/2/23, I filed a Motion for more time under prejudice in the other-case given the Clerk of Court Ordered that I may not exceed three pages despite good cause and requirement for more time under my unique situations. The Order effectively chilled my ability to effectively refer to all the facts and case law necessary to defend my 5th Amendment right to a fair proceeding by the threat of the irreparable loss of my private right to religious belief, substantial burden to access to courts and involuntary servitude against my asserted invocation of the 13th Amendment in the attached Motion for reargument on this courts Denial of costs, fees or taxes with leave to reassert the Motion. I reassert the Motion to vacate 5/19/23 Order, motion to exempt costs and reargument on denial of motion to exempt costs now in full, and incorporate it herein, especially concerning the page-limit threatening Order compelling me to comply or risk

violating my religious beliefs, Motion to correct Motion to vacate, and related documents in their entirety.

I was compelled not to include legal arguments and facts under the threat of this Court forcing me to violate in violating my religious beliefs against Jesus Christ, and the right to petition to prevent irreparable injury in terms of loss of other Constitutional asserted rights given the threat of malicious bad faith fines and my religious beliefs against debt as shown in my leave to file in forma pauperis I incorporate herein and file contemporaneously herewith. At 3DI-55 I also note on the record evidence Third Circuit appeared to punish me in retaliation of exercising my right to petition in the civil rights case in bad faith to chill my speech and petitions. US Amend I.

The clerk's order 5/19/23 should be overturned in light of my motions to exempt fees and costs given my poverty, religious objections to debt, invocation of the 13th Amendment and debt creating an obstacle so great as to deny me the First Amendment right to petition the courts, effectively in bad faith denying me access to the courts in violation of the 5th Amendment and First Amendment.

I called Gail more than a week before the due date 6/13/23. She, Pamela Batts, assured me I would be granted more time in the other-case. I think I called her again on 6/13/23 because I was panicking. I had no reason to believe 3rd Circuit Court would deny my reasonable, necessary request for a stay or time to preserve my fundamental rights and the eliminating my licenses but for my exercise of fundamental rights of 1st Amendment right to petition, speech, associate believe, 6th Amendment right to self-representation, right to Equal Protection and a fair and meaningful opportunity to be heard under the 5th and 14th Amendments and Delaware claims.

I also filed Motion for a stay as I require time in order to effectively argue the Order below in the Other-case must be overturned under the threat of **6 new additional law suits against me should I fall short, including one by the US Supreme Court**. The Court denied a stay on 6/30/23 abusing its discretion creating manifest injustice against me by the severest of penalties dismissing the case, while denying me the right for a rehearing on outstanding motions and the 6 or more additional motions denied by an order filed simultaneously therewith therein or by failure to address. I believe if this court does not grant a stay 6 new law suits may be filed against me which would vitiate my fair and effective opportunity to petition to prevent not only 6 needless law suits in arising from this case but also to prevent the vitiation of my private First right religious belief, speech, association and other claims by allowing me to effectively exercising my First Amendment right to petition in the civil rights case to defend claims therein.

I filed motions for reargument after 6/30/23 to assert my 1st and 5th Amendment right to petition and be heard pursuant to FRAP 40 on motions for rehearing or reargument on the denied motions for a stay, time, vacating order, failure to recuse and dismissal for failure to prosecute, I incorporate herein.

The 3rd Circuit Court unreasonably and in bad faith denied my motion to reopen the case and all my motions filed after 6/30/23 effectively depriving me of the right to appeal and an opportunity to be heard to defend my exercise of Constitutional liberties and my interests in my licenses under US Amend I, V, and FRAP 40. I do not think anyone wants 6 new needless law suits, should the orders at Third Circuit not be vacated by this court. The new law suits would effectively vitiate my ability to protect my 1st Amendment Rights, 6th Amendment rights and other claims in this civil rights case. I do not have the resources to fight potentially 14 defendants in this case, the other-case or potentially 6 additional lawsuits simultaneously due to

poverty, lack of time and resources. I was required petition before this Court regarding a reciprocal order case number 22-7695, which I was wrongly and unfairly deprived of by this US Supreme Court's staff. In addition, I have two outstanding cases. I must be afforded time to petition in other cases, as well as in this.

I am prejudiced without additional time. I require time under the 1st and 5th Amendments to prevent Third-Circuit from vitiating my 1st Amendment right to petition as Judge Phipps did below by denying my attached motion for a stay while granting the attached motion for additional time, and denying my attached motion of a stay pending the US Supreme Court's determination of whether denial of a stay was in error.

While I appealed before this USSC for an interim stay before judgment, the Supreme Court appeared confused between my petition before judgment before the court wherein I asked the Court for an interim stay pending the Original Delaware Disciplinary proceeding and the Third Circuit reciprocal before the Court from my application for a stay before Justice Alito wherein I requested a stay of this proceeding pending the US Supreme Court's determination as to whether Judge Phipps committed legal error by denying a stay vitiating my access to the courts. I at no time sat on my rights, but the US Supreme Court delayed in docketing as to render the relief requested unavailable. The government compelled obstacle was so great as to deprive me of the opportunity to petition the Delaware original order by government force, not free choice. I did not have the means to appeal the original disciplinary order as I fought multiple lawsuits simultaneously.

Third Circuit Order vitiates my rights by creating obstacles to petition in some cases in exchange with my fundamental first amendment right to petition in other cases by denying my

request for a stay and time, without a fair opportunity to reargue by the severest of penalties dismissing the case.

A lawyer's right, my right to pursue my profession constitutes a property protected by the due process clause of the 5th and 14th Amendment, and of which I cannot be deprived for any whimsical, capricious or unreasonable cause, including the government's disagreement with my Constitutionally protected religious-political beliefs.

The State placed my license to practice law on disabled to chill my 1st Amendment rights to religious belief, exercise, speech, association and petition but for their religious-political-poverty animus. I must be afforded fair access to the courts to defend my licenses to practice law from being placed on inactive disabled or lost but for my faith in Jesus Christ, and exercise of fundamental rights. US Amend I, V, XIV.

Conditioning my ability to petition under the threat of government compelled religious violations and loss of other Constitutional rights such as access to other courts to exercise the 1st Amendment right to petition prejudices me. I must not be compelled to violate my religious belief against debt in order to regain my licenses, safeguard my Constitutional liberties or preserve my other claims. Nor should I be punished for my exercise of the right to access to the courts to defend my religious beliefs because the Defendants and the original disciplinary Court finds my citations to the Bible and religious beliefs contained in my speech in my private petitions illogical. *See, Brief of the Southern Baptist Theological Seminary, the Ethics & Religious Liberty Commission, the International Mission Board, and Dr. R. Albert Mohler, Jr. as amici curiae in Support of Petitions before the US Supreme Court by the Little Sisters of the Poor Home for the aged, Denver Colorado, et.al, Petitioners v. Sylvia Matthews Burwell, Secretary of Health and Human Serviced, et. al*, No.15-105, 2015 WL 5013734 (US).(The Court

allowed references to the bible in other RFRA petitions); See, *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 682. (“Courts have no business addressing whether sincerely held religious beliefs asserted in a RFRA case are reasonable.”) *Also see, Africa v. Pennsylvania*, 662 F.2d 1025, 1025 (3d Cir.), *cert. denied*, 456 U.S. 908 (1982); (“Judges are not oracles of theological verity, and the founders did not intend for them to be declarants of religious orthodoxy.”); *Employment Div., Dept. of Human Resources of Ore. v. Smith*, 494 U. S. 872, 887, (“Repeatedly and in many different contexts, we have warned that courts must not presume to determine the place of a particular belief in a religion or the plausibility of a religious claim.”); *Cantwell v. State of Connecticut*, 310 U.S. 296, 60 S. Ct. 900, 84 L. Ed. 1213 (1940); *Remmers v. Brewer*, 361 F. Supp. 537, 540 (S.D.Iowa 1973) (court must give "religion" wide latitude to ensure that state approval never becomes prerequisite to practice of faith); *Presbyterian Church in U. S. v. Mary Elizabeth Blue Hull Memorial Presbyterian Church*, 393 U. S. 440, 450, (1969) (holding that “the First Amendment forbids civil courts from” interpreting “particular church doctrines” and determining “the importance of those doctrines to the religion.”); *Ben-Levi v. Brown*, 136 S. Ct. 930, 934; See, *Holt v. Hobbs*, 574 U.S. 352; *In re Eternal Word Television Network, Inc.*, 818 F.3d 1122, 1140 (11th Cir. 2016)(“The Supreme Court cautioned that "federal courts have no business addressing" such questions of religion and moral philosophy.” (Internal citation omitted)); *Thomas v. Review Board*, 450 U.S. 707, 714 (1981), "religious beliefs need not be acceptable, logical, consistent, or comprehensible to others in order to merit First Amendment protection.").

“To be sure, a state may not condition the grant of a privilege, [a license,] or benefit upon the surrender of a constitutional right.” *Minn. Ass’n, Health Care v. Minn. Dept., P.W.*, 742 F.2d 442, 446 (8th Cir. 1984); Citing, *Western Southern Life Insurance Co. v. State Board of*

Equalization, 451 U.S. 648, 657-58, 664-65 (1981); *Sherbert v. Verner*, 374 U.S. 398, 404-05, (1963).

“The doctrine that a government, state or federal, may not grant a benefit or privilege on conditions requiring the recipient to relinquish his constitutional rights is now well established.” Citing, *Jones v. Board of Education*, 397 U.S. 31, 34 (1970); *E.g.*, *Cafeteria Workers v. McElroy*, 367 U.S. 886, 894; *Sherbert v. Verner*, 374 U.S. 398, 404; *Speiser v. Randall*, 357 U.S. 513, 519-520; *Garrity v. New Jersey*, 385 U.S. 493, 499-500; *Kwong Hai Chew v. Colding*, 344 U.S. 590, 597-598; *Frost Trucking Co. v. Railroad Comm’n*, 271 U.S. 583, 593-594; see *Van Alstyne*, *The Demise of the Right-Privilege Distinction in Constitutional Law*, 81 Harv. L. Rev. 1439, 1445-1454 (1968); *Comment*, *Another Look at Unconstitutional Conditions*, 117 U. Pa. L. Rev. 144 (1968). As stated in *Homer v. Richmond*, 292 F.2d 719, 722: (“One may not have a constitutional right to go to Baghdad, but the Government may not prohibit one from going there unless by means consonant with due process of law.”)

“Neither the state in general, nor the state university in particular, is free to prohibit any kind of expression because it does not like what is being said.” *Jones v. Board of Education*, 397 U.S. 31, 35-36 (1970)

The United States Supreme Court in *Kennedy v. Bremerton School Dist.*, No. 21-418, at *15 (June 27, 2022) held, “Where the Free Exercise Clause protects religious exercises, whether communicative or not, the Free Speech Clause provides overlapping protection for expressive religious activities.”

In that case, the Court granted a professional coach the right to exercise private religious belief and speech, indicating the state’s punishment violated the Coach’s first Amendment right

applicable to the state pursuant to the 14th Amendment, despite his association as a government employee or agent.

This case must be extended to me to prevent the state, federal government and additional governments' including Judge Diamond of the Eastern District Court of PA punishment of me, but for the exercise of my exercise of my religious belief, as outlined in my speech in my petitions, no matter how repugnant or illogical my religious beliefs appear to the state and Federal government.

I must be afforded a fair opportunity to be heard in defense of my license below and my civil rights claims, licenses and liberties without compelled religious violations placed upon me in the form of denial of time substantially chilling my speech causing me to ineffectively plead before this Court to safeguard my religious belief in Jesus and my licenses and other liberties.

US Amend I, V, VI, XIII, XIV.

Freedoms are not for sale, in exchange for professional licenses. When the courts make business the law by making professionals the law, by self-regulating, mammon, not freedom, or the people is protected. Individuals and individual liberty are instead sacrificed under the lie money grants freedom when it creates slavery by how it is coined. US Amend I, XIII.

Lawyers and judges should be corrected within the purview of Constitutional limits without threats of enslaving them by fines in contravention of the 13th Amendment, as applied to me as a party of one with unique religious beliefs against debt, but also as applied to other professionals and federal judges.

I must be afforded fair access to the courts to defend my license to practice law from restrictions but for my faith in Jesus Christ, and exercise of fundamental rights, without

compelled denial by requiring I fight multiple law suits without the material means or time to pay for paper and postage simultaneously. US Amend I, V.

I am utterly poor. Denial of a stay increases the threat of multiple suits causing needless costs and a substantial burden and obstacle to my access to the Courts in contravention to my 1st and 5th Amendment rights to Petition and access to the Courts applicable to the Federal Courts via the Equal Protection component of the 5th Amendment, for me, a member of class of one due to religious beliefs against incurring debt combined, invocation of the 13th Amendment and due to utter poverty. Poverty creates a substantial burden to my access to this court requiring an accommodation in the form of time.

“Because this case implicates the [Constitutionally protected] right of access to the courts, [and First Amendment rights to free speech, religious belief, association and exercise of religious beliefs] 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). I require an accommodations for fair access to this court under the circumstances in the form of additional time to avoid additional costs associated with the threat of additional law suits that will create an obstacle to access to the courts as to effectively deny me the first amendment right to petition fairly.

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

The Delaware Order against me and the reciprocating Order creates a government incited economic substantial burden upon me, and prejudices me by forcing me into a maintained state

of poverty by preventing me from seeking to get my former position back at my old law firm as an attorney, or any work as a law firm, and harms my reputation to make me less attractive to employers.

While, poverty is not a suspect class, my right to meaningful access to the courts, despite the inherent burden of poverty, and my religious beliefs and strongly held religious exercise relating to my religious belief against indebtedness are protected. In addition, fundamental rights are implicated.

So, Third-Circuit must have a compelling reason to deny my request for a stay to prevent costs to protect my access to the courts to defend the exercise of my fundamental rights including my religious beliefs narrowly tailored to meet the important justification.

There is no compelling reason to deny my request for a stay. Third-Circuit abused its discretion.

There is no justification narrowly tailored to meet any compelling reason to deny a stay for me to ascertain how I may effectively plead this case while preventing 6 new law suits without the substantial burden of immediate additional costs without adequate time to prevent the same from arising causing a burden so great as to vitiate my 1st Amendment right to petition and 5th Amendment right to access to the courts without intentional discrimination to prevent me from petitioning to defend and prevent the loss of my Constitutional rights.

I must be afforded equal access to the courts as a party of one with unique religious beliefs against money as God and guide, without disparate treatment in violation of my First Amendment right to religious belief and right to exercise my religious beliefs, and 5th Amendment Equal Protections component applicable to the Federal courts based on disdain for my unique religious beliefs.

I must be afforded access to the courts in the form of time and resources by a stay to defend my rights in the civil rights case. The civil rights case arises based on about 20 years of Delaware Courts, their arms or their agents' violations of my private exercise of the First Amendment right to petition, to religious belief, exercise of religious belief, association and unequal protections under the law based on religious-political-poverty or place of origin, and more recently procedural due process violations, witness tampering, intentional infliction of emotional distress resulting in physical manifestation and the 6th Amendment right to self-representation and defamation per se claiming my religious belief in Jesus is a mental disability. Please see 3DI 56 containing documentation of Delaware's misconduct over the course of about 20 years.

The attachments to 3DI 56 I incorporate by reference to the record below outline the State's retaliation against my exercise of the right to petition even before I was barred in DE, compelled violations of my asserted religious belief upon admission, loss of 2 million dollars in expected income over the course of the past two decades, and other compelled violations I incorporate herein by reference.

I will lose my liberties, livelihood, claims and be tempted to lose my eternal life if time is not granted. This law suit also has new and additional claims based on disciplinary proceeding brought by the state of Delaware ("State"), with religious-political-poverty animus to punish me for my exercise of the private 1st Amendment right to petition, religious belief, exercise of religious belief, associate, speech, and to cover up the State's retaliation against me for petitioning the Court to safeguard my rights, predominately of the 1st Amend. right to exercise my religious belief over the course of about 20-years. I incorporate in its entirety the initial-civil-rights complaint I filed, and exhibits thereto. The State retaliated against me for exercising

my 1st Amendment right to petition for relief even prior to bar admission by punishing me for petitioning its partner grant me relief when my DE bar materials were destroyed by a leaky ceiling at the dorm room I resided. I passed the DE Bar on the first try, but lost expected income in the amount of about 2 million dollars over the years based on retaliatory action by the state.

The DE-Supreme Court compelled me to violate my religious belief against swearing in despite my request to affirm upon my admissions to the DE bar . (3DI 56 at Exhibit E). After I learned affirming violates Jesus Christ's teachings I petitioned the DE Supreme Court to be excused from affirming too. (3DI 56 at Exhibit F). The court denied my request violating my 1st amendment right to exercise religious belief. Throughout the years DE Supreme Court members or agents have violated my Constitutional rights by disparate selective treatment. During my first appearance as a lawyer in Court, Judge Smalls called me a Philadelphia lawyer as if PA was a bad word. Former DE Supreme Court Justice told me to go back to PA after a CLE when I stole his thunder by answering a question on recent USSC proceedings not because I am smart, but because I care and listened to public radio. My friend Stephanie Noble had dear eyes. I drafted a contained in the record below petition with the DE Supreme Court and created the bumper-sticker related to this when I ran for office in 2018, attached hereto, along with newspaper articles, one of which shows government agents chilled my speech. (3DI-56 at Exhibit G-H-I)

The State disregarding my request against family-law appointments per my second request to be removed from the roster as against my religious belief, per two Court petitions in 3DI 56 at Exhibits J K.

I petitioned the court in *Kelly v Trump* to alleviate a substantial burden upon my religious belief, and instead of alleviating it, they worsened it and demeaned me for my Bible references per Petition at 7. (3DI 56 at-Ex L)

I ran for local office in 2018. After I lost in 2018, I petitioned the democrats to run for Federal House without violating my religious beliefs with regarding to filing requirements. *See Matthew 6:1-4*. They said no. I filed a lawsuit against the democrats to enjoin them from requiring a filing fee in compelled violation of my religious belief. (3DI-56-Exhibit M) Per a staff member's request I also sent a letter to the US Supreme Court concerning running for president without compelled religious violations. (3DI-56-Exhibit N). Please note in *Kelly v Democrats* I averred a Republican Representative Steve Smyk rescued me when Rep Ron Gray attacked me on Bury the Hatchet Day, despite the fact I am a democrat, showing impartiality and leadership. (3DI-56-Exhibit O).

I have religious and Constitutional objections to certain Delaware Disciplinary rules and the federal rules and Constitutional arguments against lawyer disciplinary proceedings and disciplinary proceedings against federal judges too that are too costly to attach at this time, and yet I and the public have an important interest in maintaining fair impartial courts not controlled by partial selfish interests that inhibit their ability to uphold the impartial Constitutional application to the rule of law.

I asserted these claims as well as new claims that arose after the civil rights case was filed on October 25, 2021 in the Delaware District Court pleadings I appealed, including in the attached Motions for rearguments under FRCP 52, 59 and 60 in the trial court which show I was not afforded notice of the initiation of the disciplinary suit on December 10, 2021 despite the Defendants averring such notice was given. Nor was I afforded an opportunity to self-represent in violations of the 6th Amendment by the appointment of counsel on December 13, 2023, apparently no notice was given to anyone on my behalf on December 10, 2023 as the Board averred. I asserted new compelled violations of my asserted religious exercise under the 1st

Amendment, denied motions to subpoena witnesses, the state's denial of its own rules, concealing evidence in my favor sealing my own pleadings, preventing me access to documents in a case where I am a party and other harm I noted below, but cannot attach them all herein due to printing and mailing costs making it unaffordable given my compelled state of poverty as Defendants prevent me from working in the occupation of my choice and I assert my right against involuntary servitude by invoking the 13th Amendment and the 1st Amendment on religious beliefs and exercise grounds.

I placed the Constitutional challenges to disciplinary proceedings on the record before Third Circuit below and I extended the arguments to prevent regulating the US Supreme Court and federal judges. 3DI-57-58.

Pursuant to US Amend V, I seek a reasonable fair opportunity in the form of additional time to defend the exercise my 1st Amendment right to petition to assert my claims in the civil rights case in order to prevent the permanent loss of the exercise of fundamental rights including my private 1st Amendment right to petition, speech, religious belief, exercise of religious belief, 6th Amendment right to self-represent in state Court, 13th Amendment right against involuntary servitude, harm to health, loss of property interests, 6 new law suit needless law suits with a certain one before the US Supreme Court, loss of licenses, Constitutional arguments against disciplinary proceedings and rules including but not limited to Rules 7, 13, 14, other Constitutional liberties and claims, not by free choice, but government compelled choice, should this court not accommodate me by allowing a stay so as not to forever deprive me of my

religious exercise of belief in Jesus without threat of punishment in DE, and other injuries caused by denial of a time. ¹²

A denial of time vitiates my ability to effectively exercise my 1st Amendment right to petition in this civil rights and in the other-case on appeal effectively vitiating my 1st Amendment right to religious belief, exercise of belief, speech, association, and other claims. Denial by this Court would compel me against my will to lose my First Amendment right to religious belief in Jesus, exercise of belief, 1st Amendment right to petition to safeguard Constitutional liberties and other claims forever in DE as the Delaware Courts and its arms will continue to consider me below the protection of the Constitutional law as they have deemed me unworthy for almost 20 years. (3DI-56)

A stay is required to prevent irreparable injury to me in terms of the loss of my freedom to exercise private 1st Amendment right to religious belief in Jesus Christ in DE, petition, speech, association, 6th Amendment right to self-defense, and licenses under the threat of not being able to buy and sell but for my religious beliefs the state finds repugnant.

I also require a stay to sustain my life and health. I asserted my right to live in all courts and have attached on the record health records and averred that I must assert my right to live under less strenuous circumstances because people have the sin against the holy spirit by the

¹² See, *Centifanti v. Nix*, 865 F.2d 1422 (3d Cir. 1989) (“Suspended attorney who had been denied reinstatement to bar brought civil rights action against Chief Justice and Justices of Pennsylvania Supreme Court alleging various constitutional defects in procedural rules under which Supreme Court considers petitions for reinstatement of suspended attorneys.....The Court of Appeals, Cowen, Circuit Judge, held that: (1) **federal district court had subject-matter jurisdiction**; (2) **district court abused its discretion in denying attorney's motion for leave to amend complaint**; (3) district court properly denied attorney's motion to compel discovery of privileged documents; and (4) attorney's complaint was **not barred by state statute of limitations for tort actions or by principles of res judicata.**”) (emphasis intended).

desire not to want to inconvenience their own for the few to sustain life and health. App. K I have religious objections to healthcare and mental healthcare. Id.

A stay would prevent duplicity of potentially conflicting decisions in parallel disciplinary cases and 6 new law suits. All I ask is for a fighting a chance an opportunity to be heard fairly, not a guarantee of justice. US Amend I, V. A stay would prevent potentially needless unaffordable costs relating to duplicated litigation on the same issues from becoming a substantial burden upon my access to the courts, creating an obstacle so great as to deny me access to the courts to defend my license and exercise of fundamental rights, given my poverty and religious objection to debt.

A stay would prevent a government compelled violation of my religious belief against indebtedness in order to exercise my right to petition the Court in defense of the exercise of fundamental rights and license(s) by increase in needless, duplicative costs,

A stay would prevent government compelled involuntary servitude in exchange with access to the courts to defend my licenses and liberties from being taken away for my religious beliefs in Jesus reflected in my speech contained in my private petitions,

A stay would prevent the risk of loss of my fundamental rights to religious belief, religious exercise of beliefs, political and religious speech, association and the right to privately petition to the courts to address grievances to safeguard my exercise of religious belief without state persecution but for disagreement with my religious-political speech contained in my petitions, before the Delaware Courts.

A stay would prevent the chilling of the exercise of First Amendment liberties by the public or other professionals who may fear reprisal in the form of the loss of their license or

being deemed mentally disabled but for their exercise of individual liberties merely because the State disagrees with their First Amendment beliefs, or their petitions or their attempt to hold the government, including government agents of both state and federal government to the limits of the Constitution.

A stay would prevent harm to my health and life. My health has diminished. I require time to maintain my health and life, in light of my specific permanent weakness related to a past surgery in my youth, which Defendants and all courts in related litigation have been apprised of, even the Delaware Chancery and Supreme Court. Without time to accommodate my weaknesses my health will diminish further, jeopardizing my life. (Citing, US Amendments I, V, XIII).

There is a reasonable probability that four Justices will consider the issue sufficiently meritorious to grant certiorari or to note probable jurisdiction; (2) a fair prospect that a majority of the Court will conclude that the decision below was erroneous; and (3) a likelihood that irreparable harm will result from the denial of a stay.

The public, the Court and the Defendants are not prejudiced by the stay. In addition, in my other appeal and on the record below in this case, I indicate my belief the courts are in danger. I believe my appeal for the Third Circuit matter may stifle the plans to eliminate courts, before a far worse scheme is implemented. I must be afforded an opportunity to provide evidence of my belief. It is the mere opportunity to be heard I seek to protect not the guarantee.

The balance of the equities require a stay to prevent the loss of my fundamental rights

Accordingly, this Court must grant a stay before the United States Supreme Court should this petition be granted. In the alternative, this court must grant a stay should this case be remanded and not merely vacated.

I respectfully request the court order be vacated and my license restored even without remand.

XVII The Court erred as a matter of law as a matter of fact creating manifest injustice against me in denying my motion to exempt costs, fees and taxes before Third Circuit 1. to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, 2. to prevent a government compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights, and 3.to prevent compelled involuntary servitude in exchange with access to the courts to defend my licenses and liberties from being taken away for my religious beliefs in Jesus. (Citing, US Amendments I, V, XIII).

Pursuant to Fed. R. App. P. 2, in the interest of justice, move this Honorable Court to exempt PACER fees for electronic filing before this Honorable Court for case number 22-3372, 1. to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, 2. to prevent a government compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights, and 3.to prevent compelled involuntary servitude in exchange with access to the courts to defend my licenses and liberties from being taken away for my religious beliefs in Jesus. (Citing, US Amendments I, V, XIII).

The Court not only denied my request but in bad faith based on viewpoint of the petitions to wherein I require the courts and court's staff adhere to and not violate the Constitution the staff and the court threatened me with forced violations of my religious belief but for the exercise of my right to petition and other fundamental rights.

Any costs, taxes or fees costs are unaffordable.

The original disciplinary order from Delaware from which the reciprocal suit by the Eastern District is based adjudicated me inactive/disabled.

The Delaware Order prevents me from working as an attorney. I am unable to seek employment at my former law firm where I would be performing real estate settlements. My former law firm is a great law firm McDonnell and Associates. The people there care about their clients and employees above money.

I am impoverished and am not allowed to work in my profession.

Even if the Order in DE is overturned, the Eastern District's Order may prevent my former firm from rehiring me. They work with others who perform their due diligence to protect clients and the large amounts of money in real estate transactions.

The firm does thorough background checks.

Having any blemish remaining on my license affecting my credibility or appearance of credibility may deem me unemployable.

Since I am poor and unemployed, I do not have money to pay fees. My parents have indicated they have decided to cut off or reduce my inheritance should they die, because of this litigation.

It is against my religious belief to go into debt, especially given I am not permitted to work for pay as an attorney in DE. (See, Bible Romans 13:8. "Owe nothing to anyone, but to love them")

I respectfully request this Court grant me an exemption from costs, fees and taxes in this case, too (1). in order not to compel me to violate my religious beliefs in exchange for access to the courts or (2). suffer an economic substantial burden so great as to deny me access to the courts in defense of my First Amendment liberties, license and related interests and (3). to

prevent government compelled involuntary servitude to sin by making money savior in place of God.

It is my religious belief people should buy and sell by free choice, not by forced choice by artificially man-made government compulsion to be exploited by government backed private or foreign partners in a fixed not free economy. ¹³

I argue compelled debt in my case not only violates the 13th Amendment against involuntary servitude, but violates my private, personal individual religious belief in Jesus, God the father and the holy spirit as guide and God, not money by government compelled force. US Amend I, XIII.

I believe the plans under the UN, G-7 and global agenda violates my religious belief against indebtedness to money and material gain as God at a greater more horrific level, and violates my First Amendment right to religious belief. Creating precedent in this case, may prevent the elimination of not only my Constitutional liberty but the liberty of all Americans protected under Constitutional law. I hope to somehow tie that in to other litigation.

¹³ By fixed I mean lawlessness, making business through entities the standard of care and the letter of the law. This makes businesses above the law and above Court correction. I desire laws that prevent businesses from killing, oppressing, and destroying human life, liberty and health for material gain. The fixed system allows businesses to be above the law by making the experts and the business's standards above government guidance and correction when they destroy and harm other people's lives and liberty. I desire the Judges to judge, not businesses through experts whose aims are exploiting people for money and material gain. Whereas Courts aim is to protect liberty and lives. US Amend I and preamble. Article III, Section 1 of the Constitution vests the judicial Power of the United States in the United States Supreme Court and the federal Courts. Powers may be waived if not exercised. When this Court's relinquishes its powers, it allows the other two branches to lawlessly rule as opposed to serve by lusts like business greed. The other two branches will sacrifice the people, land and resources to private and foreign powers if left unstopped and unrestrained by the rule of Constitutional law. You have the power and authority to prevent war, economic crash and the dismantling of our government, should someone with standing ask.

I believe people teach a lie, despite their ignorance of truth, and sin against God and man for teaching government is a social contract to govern. It is a forced choice upon the populace without a meeting of the minds or consideration. The people's souls are not to be sold by the government through the government backed private or foreign partners to be sacrificed to gain the world. Leaders are charged with caring for the people and protecting their liberty. Misleaders seek to control and exploit for material gain a no longer free people. It is written *Mark 8:36*, "What profits a man to gain the whole world [by money or material gain only to lose his eternal life in the second death to be no more.]"

The contract of government is by those governing who agree to more limited liberty in order to the authority to serve, govern and guide.

I seek to preserve our government with honesty by seeking to unrig the system of corruptions within by requiring the Courts place checks on the other branches of power and their own when those within branches exceed their Constitutional authority and violate the Constitutional laws that protect the people they are charged to serve, not exploit.

There appears to be a societal peer pressured attack against the courts to create lawlessness under the guise of freedom. There appears to be an attack to dismantle the government as opposed to unrig unjust practices which exceeds Constitutional laws that protect the common people.

I seek to preserve our system of government by upholding the Constitution and asking the courts to guide those misguided by lusts under the belief of laws.

I believe that people serve lawless lusts untamed by love or the rule of law when they seek to do what they want regardless on the impact on other people God loves, untamed by the

rule of law or by love. This lawlessness under the pretty words research, science, study, experts, professions or business allows oppression, killing, stealing and destroying the lives and health of others for the bottom line.

I believe we must protect people's seemingly wrong choices too, to disagree with us or think differently. After all we may be the ones who in the dark in need of guidance at times.

The diversity in allowing equal protections of the laws is not sameness but equal protections to believe and exercise belief by the dictates of our conscience within limits to protect other people's life and liberty.

Equal protections under the law is not the dictates of the equal compelled treatment by the US through the BIS, IMF, World Bank, UN or WHO or other entity to force its sameness under the guise of equality, freedom or sacrificing people's life to gain the world.

I believe differently than the UN's collaborative, conditional, conformed agenda which I believe misleads people to harm and I believe damnation in hell by driving out the ability of the people to unconditionally love, under a bank controlled environmental credit and debt system. The stakeholder system gives entities a stake in other people's lives by economic compelled force. A free people are not a piece of property to exploit as chattel for an alleged common interest. US Amend XIII

The global agenda violates my religious beliefs against debt, making every human in debt and indebted as stakeholders in someone else's plan, someone else's will which is not free will or God's will but an economically compelled will. It is so horrific. I am sorry if I am unable to discuss it in current litigation. My hope of a hero remains with the Court to unravel the lawlessness reigned by lusts and desires such as unbridled business greed. I believe there is a

plan in the years to come to eliminate the courts to eliminate the rule of law down the line if left unstopped.

With regards to my plea, the Government is not permitted to discriminate based on religious belief or the viewpoint of my petition wherein I require judges and court staff obey and not violate the law specifically Delaware Justices by denying me access to the courts by requiring my enslavement to debt. See 3DI 56, A-4, A-5

Given my poverty, any fee creates a substantial burden to my access to the courts and my religious-belief against indebtedness.

I am a Christian, a child of God, a believer of Jesus Christ. I believe people sin by debt, focusing their mind, and life towards the aim of gathering money as savior in place of God's desires.

I believe people sin for using money to control others, to do their will, or the government's will by reward, or punishment in terms of fines because I believe this misleads people to hell by making money master, God and guide.

I believe there is a difference between unjust decrees and just decrees. Just decrees care for the people, while protecting their liberty within limits so as to protect the liberty of others. Unjust decrees seek to control people by sacrificing individuals or individual liberty for money, material gain, cost, convenience and other superficial unjust reason, under the lie of caring for the many. See *Isaiah* 10:1-3. Unjust laws also teach people to blind their eyes by desire for money gain as savior, from seeing clearly to love others beyond their own.

I believe the United States Supreme Court is misguided into sacrificing individual liberties and individuals for collective interests of businesses or organizations.

Collectively, united by shared interests, we can do no good. Only individuals may do good by unconditional love, reflecting the image of God. Collectively, by shared, united interest in business or other group or entity, we are enslaved to those who tempt us with reward or threat of harm towards our conditional, collective, interests. Entities are not free to do what is right by its bound unified, conditional, collective aims.

The individual is more powerful and may do more good than collective groups, organizations, entities, charities or businesses. Only an individual may lay down his desires, and the desires of men, to think, to know, in order to love, to do what is right to overcome the lusts of men.

I believe that the executive and legislative branch give us a republic by representation through the vote. I believe the Courts give us freedom, in the form of a democracy by protecting individuals and individual liberties from being sacrificed by the majority or collective groups through the vote. I believe the courts are our hope of a hero, in protecting independence required to safeguard Constitutional liberties from being sacrificed on a global level. See *Amos 5:15* and *Matthew 23:23*.

I am quite concerned how countries are sacrificing independence which gives leaders the freedom to care for their people in exchange for collective, conformed purposes, under the UN, the Paris Accord and other agreements which enslave the people by artificial indebtedness to do the will of collective, conditional groups, substantially burdening freedoms.

I believe people go to hell for creating artificial indebtedness which enslaves other people to pay back a debt. That is what the global plans will do if unstopped by the Courts to protect individual liberties. The plans appear to allow central banks, whose shareholders are banks to control the governments by monetary rewards and debts. It is an abomination. The more debt,

and the worse off the people are, the more profit on debt interest and debt control banks gain over governments, businesses, people and countries. The banks have incentive to make people worse off. There appears to be a trend to eliminate the just rule of law in place of the lawlessness spoken of in the bible, through unjust decrees, oppressing, killing, stealing and destroying human life and health to serve business greed, not good. Money and business should not be the law. Money is not freedom, and should not be used by the government to control a no longer free people

My case may grant the Court the ability to safeguard individuals and individual liberties of speech, religious belief, exercise, right to petition regardless of poverty or religious or political affiliation.

Please help me by removing an obstacle by preventing the foreseeable costs upon me that will vitiate my fair access to the courts. Usend I, V. I had no idea I would be fighting potentially up to 6 cases simultaneously, while I sought to defend my exercise of religious-political beliefs, religious-political speech, religious-political association and my religious-political petitions in the Delaware Disciplinary proceeding. Two Courts have decided not to reciprocate discipline.

These additional law suits have increased costs, and caused me to panic, lose sleep, and gain baby white hairs, and have harmed my health given my permanent weakened state due to bad healthcare in my youth wherein I assert my religious exercise to live for God and not die for the wicked evil convenience, vanity and material gain of men in place of God which is idolatry leading to hell by making man's desires and will God in place of God. If I expend all my resources in terms of time, paper and other costs, by defending all cases simultaneously only to

run out of resources, I would be prevented from defending my exercise of fundamental rights in any case to its conclusion.

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

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

I am utterly poor. The costs, fees or taxes create a substantial burden and obstacle to my access to the Courts in contravention to my First Amendment right to access to the Courts applicable to the Federal Courts via the Equal Protection component of the 5th Amendment, for me, a member of class of one due to religious beliefs against incurring debt combined and due to utter poverty. See, *Abdul-Akbar v. McKelvie*, 239 F.3d 307, 317 (3d Cir. 2001) ("This requires us first to determine whether Appellant is a member of a suspect class or whether a fundamental right is implicated."); *Harris v. McRae*, 448 U.S. 297, 323, (1980) (noting that poverty is not a suspect classification)." (*But see, Lewis v. Casey*, 518 U.S. 343, 370 (1996) "[A]t all stages of the proceedings the Due Process and Equal Protection Clauses protect [indigent persons] from invidious discriminations."))

"Because this case implicates the [Constitutionally protected] right of access to the courts, [and First Amendment rights to free speech, religious belief, association and exercise of religious beliefs] 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).

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

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

“When an indigent is forced to run this gantlet of a preliminary showing of merit, the right to appeal does not comport with fair procedure. . . . [T]he discrimination is not between ‘possibly good and obviously bad cases,’ but between cases where the rich man can require the court to listen to argument of counsel before deciding on the merits, but a poor man cannot. . . . The indigent, where the record is unclear or the errors are hidden, has only the right to a meaningless ritual, while the rich man has a meaningful appeal.” *Douglas*, 372 U.S., at 357-358

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

The Delaware Order against me and the reciprocating Order creates a government incited economic substantial burden upon me, and prejudices me by forcing me into a maintained state of poverty by preventing me from seeking to get my former position back at my old law firm as an attorney, or any work as a law firm, and harms my reputation to make me less attractive to employers.

While, poverty is not a suspect class, my right to meaningful access to the courts, despite the inherent burden of poverty, and my religious beliefs and strongly held religious exercise relating to my religious belief against indebtedness are protected. In addition, fundamental rights are implicated.

So, the Court must have a compelling reason to deny my request for an exemption of the PACER fees to protect my access to the courts to defend the exercise of my fundamental rights including my religious beliefs narrowly tailored to meet the important justification.

There is no compelling reason to deny my request for an extension for a PACER waiver, especially since it will prevent my need to contact the court should the one free glance fail to save.

Nor is any justification narrowly tailored to meet any compelling reason. The Court may grant an exemption and has granted an exemption in another case. This has prevented has the need to call the court to confirm documents were received and filed.

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

There is no opposing counsel to request a position on.

The United States Supreme Court indicated it is the Court itself I place as the Defendants, which is quite strange.

That is how the Court placed the parties on my appeal from the Third Circuit disciplinary Order, in United States Supreme Court No. 22A 478, which relates to one argument of a case and controversy.

Wherefore I pray this Court overturn the Order below to preserve and not collude in denying me fair access to the courts in contravention of US Amend I, V.

CONCLUSION

Wherefore, I pray this Court grants this petition, vacates the orders below and grants any relief this court deems just including but not limited to granting a stay, remanding the case back

to Third Circuit to hear the merits, and mandating Judge Phipps and Scirica be recused in this case. I respectfully request this Court also limit disciplining the US Supreme Court members and federal judges within the purview of the Constitution of 1. Cases or controversies and 2. Impeachment. My case may very well be the only opportunity for the court to have a legal say outside of wrongfully submitted advisory opinions.

The Constitution affords two means to prevent partiality to self or regulators instead of the impartial application of the Constitution to the rule of law. That means lawyers and parties like me should be allowed to petition the courts to correct its own misconduct without fear of reprisal for seeking to uphold Constitutional limits and laws even judges are bound to.

Dated: December 26, 2023

Respectfully Submitted,

/s/Meghan Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
302-493-6693

US Supreme Court Number 283696

MEGHAN KELLY, ESQ.
34012 Shawnee Drive
Dagsboro, DE 19939
Meghankellyesq@yahoo.com

KIFP

Sent Via E-Mail (dbaker@supremecourt.gov)
Mr. Donald Baker
Supreme Court of the United States
Clerk's Office
1 First Street, NE
Washington, DC 20543

RE: Case Number No. 22-7695 Meghan Marie Kelly, Applicant v. Pennsylvania Office of
Disciplinary Counsel, Supplemental Brief

December 4, 2023

Dear Clerk Baker:

US Supreme Court case manager Lisa Nesbett recommended I contact you concerning the Supplemental brief in Matter . When I spoke with her this morning she kindly indicated she was the one to contact regarding petitions for rehearing.

On October 18, 2023, I filed a petition for rehearing.

On November 6, 2023, I submitted *Petitioner Meghan M. Kelly's Supplemental Brief to provide additional information not previously available on how private partnerships with the UN is schemed to be used to eliminate judicial authority in open and by stealth, Petitioner's belief the courts are in danger especially with the debt ceiling approaching November 17, 2023 with no agreement to date, and the convening of Congress October 19, 2023 to attack Justice Thomas and the integrity of the court by subpoenaing witnesses to be used against Justice Thomas and the Court in Meghan M. Kelly v Pennsylvania Disciplinary Counsel, No. 22-7695* ("Supplemental Brief").

I also sent Clerk Robert Meek electronic versions of the Supplemental Brief via email on November 6, 2023.

Nevertheless, despite the US Police confirming it would be docketed prior to November 9, 2023, it was not.

This delay in docketing prejudiced me and vitiated my First Amendment right to petition and 5th Amendment right to be heard fairly and fully. So, on November 15, 2023 I filed *Emergency Application to reopen 22-7695 to consider Supplemental Brief filed 11/6/23 in order*

not to deprive me of 1st Amend right to petition fully & fairly in accordance w/5th Amend before eliminating 1st Amend rights to religious beliefs & license. I also desired clarification on why the submission on Petitioner Meghan M. Kelly's Supplemental Brief to provide additional information not previously available on how private partnerships with the UN is schemed to be used to eliminate judicial authority in open and by stealth, Petitioner's belief the courts are in danger especially with the debt ceiling approaching November 17, 2023 with no agreement to date, and the convening of Congress October 19, 2023 to attack Justice Thomas and the integrity of the court by subpoenaing witnesses to be used against Justice Thomas and the Court.

The Court receive this November 20, 2023 but returned it in error. In *Stokes v. Delo*, 495 U.S. 320, 323 (1990), "Delay or default by courts in the federal system must not be allowed to deprive parties, including States, of the lawful process to which they are entitled."

Robert Meek indicated the application as returned due to lack of jurisdiction, a legal determination in conflict with prior US Supreme Court case law.

The US Supreme Court held in *St. L. S.F.R.R. v. Spiller*, 275 U.S. 156 (1927) "Errors by court "due to mistake of the clerk **may be corrected after expiration of the term at which the judgment was entered.**" ("emphasis intended")

Robert Meek indicated incorrectly this court did not have jurisdiction which is a determination which must be made by the Supreme Court justices not be clerks. See, *United States v. Finnell*, 185 U.S. 236, 249 (1902) ("The clerk is a ministerial officer, and, without statutory authority, can exercise no judicial functions. ")

The US Supreme Court held in *Wetmore v. Karrick*, 205 U.S. 141, 142 (1907) "The judgment of dismissal of June 12, 1899, having been entered **improvidently through a mistake or oversight** as to an entry of record, the Massachusetts court **did not thereby lose jurisdiction**, and had the power to vacate the dismissal and restore the case to the docket after the term. The *Palmyra*, 12 Wheat. 1; *Alviso v. United States*, 6 Wall. 457. *Rice v. Railroad Co.*, 21 How. 82, distinguished. " Also see, *Isaacs v. Caldwell*, 530 S.W.3d 449, 455 (Ky. 2017) (

The US Supreme Court in *Wetmore v. Karrick*, 205 U.S. 141, 142 (1907), further held, "In almost every case in which the rule is laid down by this court that judgments cannot be vacated after the term, **judgments of dismissal by mistake are excepted.** See *Phillips v. Negley*, 117 U.S. 665, and cases therein cited. "

However, I am deprived of the First Amendment access to the courts when the courts do not docket colorable pleadings by mistake. I am prejudiced by an unfair deprivation of my fundamental rights outlined in the Supplemental Brief by denial of access to the courts. Accordingly, I sought to ask the Court to cure the defect on Friday December 1, 2023 by an in person filing, despite the error in the US Police Court stamp dated November 31, 2023 on the docket. There are only 30 days in November this year.

The Court in *United States v. Mitchell*, 20 F.3d 1480 held, “extreme delay in the processing of an appeal may amount to a violation of due process.” *U.S. v. Mohawk*, 20 F.3d 1480, 1485 (9th Cir. 1994)

To date, the court has neither docketed nor rejected my supplemental brief dated November 6, 2023 with a letter outlining any deficiency and an opportunity to cure. It has been almost an entire month ago.

Early morning on December 1, 2023 I dropped off and submitted a *PETITIONER MEGHAN KELLY’ SECOND PETITION FOR A REHEARING ON DENIAL OF A WRIT OF CERTIORARI LIMITED TO INTERVENING CAUSES OF SUBSTANTIAL OR CONTROLLING EFFECT CONCERNING MY ARGUMENTS AND OTHER CLAIMS NOT PREVIOUSLY CONSIDERED WHICH MAY VITIATE MY RIGHTS SHOULD THE COURT NOT HEAR THIS REHEARING*, dated November 30, 2023.

In the petition, I request this Honorable Court cure its defect by considering the November 6, 2023 Supplemental Brief this court neither accepted nor rejected.

Should this Court reject the Supplemental brief as opposed to cure the defect in the lack of the judge’s consideration by failure to docket I require notice and an opportunity to correct any deficiencies of my good faith submission. *See Becker v. Montgomery*, 532 U.S. 757, 767 (2001).

The fact mistakes are made, including by me not merely staff show how necessary this United States Courts staff are to the judiciary. People staff are indispensable, without them claimants are deprived of any justice by overlooked papers that automation would never resolve.

I applaud the court when it upholds justice, even if delayed. Doing the right thing matters, and actually is more important than winning or losing on petitions. How you got there matters more than winning or losing, and unfair even mistaken deprivations of access to the courts cause injustices.

Thank you for your time and attention to this important matter.

Respectfully Submitted,

December 4, 2023

/s/Meghan Kelly

Meghan Kelly, Esquire

34012 Shawnee Drive

Dagsboro, DE 19939,

(302) 278-2975

meghankellyesq@yahoo.com,

US Supreme Court Number 283696

(1,071 words)

Under Religious objection I declare, affirm that the foregoing statement is true and correct

Dated: Dec. 4, 2023

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(printed)

Meghan Kelly

(signed)

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 **DeseretNews**

Senate Judiciary Committee issues subpoenas to private citizens connected to Clarence Thomas

Eva Terry

Thu, November 30, 2023 at 8:28 PM EST · 4 min read



39



Members of the Supreme Court sit for a new group portrait at the Supreme Court building in Washington on Oct. 7, 2022. Bottom row, from left, Justice Sonia Sotomayor, Justice Clarence Thomas, Chief Justice John Roberts, Justice Samuel Alito, and Justice Elena Kagan. Top row, from left, Just ... [More](#)

[The Senate Judiciary Committee](#) authorized subpoenas Thursday morning for GOP donor [Harlan Crow](#) and co-chairman of The Federalist [Leonard Leo](#) over their paying for trips for Supreme Court Justices Clarence Thomas and Samuel Alito.

Republicans, including Utah Sen. Mike Lee, said the subpoenas were politically motivated, given that the two private individuals who the senators are seeking information from are prominent conservatives.

“Democrats are breaking the Senate Judiciary Committee rules to issue

information, including the full extent of payments, gifts, travel and lodging given to Supreme Court justices, per the [committee's website](#).

In a Nov. 2 [press release](#), Durbin said he was requesting subpoenas to investigate news stories about trips and other gifts to the justices.

Clarence Thomas says he was advised personal trips need not be reported

Thomas released a [statement](#) on April 7 saying he did not report family trips due to being “advised that this sort of personal hospitality from close personal friends, who did not have business before the Court, was not reportable.” Since Supreme Court financial guidelines changed, Thomas said, “It is, of course, my intent to follow this guidance in the future.”

During the [Senate Judiciary Committee hearing](#) Thursday, Durbin said, “Both Leonard Leo and Harlan Crow are central players in this crisis. Their attempts to thwart the legitimate oversight efforts of Congress should concern all of us.”

Though Crow and Leo are connected to Alito and Thomas, [The Washington Examiner](#) reported there is zero evidence their travel together influenced the justices’ votes.

GOP senators argued the subpoenas are partisan and unnecessary

During the hearing, Sen. Mike Lee, R-Utah., said though Crow was under no obligation to, he “offered five years of his documents” to the court, which were deemed insufficient.

Lee added that on Nov. 9, a committee chairman said ethics issues within the Supreme Court should be dealt with within the judicial branch, saying, “It is within the power of the chief justice and his fellow justices to solve this problem before noon today, and they should have done so a long time ago.”

The Supreme Court issued a new [code of conduct](#) on Nov. 13 that all nine Supreme Court justices signed. Lee said, “I haven’t heard anyone describe it as inadequate or insufficient. Wasn’t that the entire condition of precedent for this committee even considering that?”

The subpoenas are issued to private citizens, and Sen. John Cornyn, R-Texas., asked Sen. Lindsey Graham, R-S.C., “Are you familiar with any legitimate legislative purpose for subpoenaing private citizens?”

Clarence Thomas' reputation," Graham responded. He claimed since both Leo and Crow are prominent, public conservatives who are on "the top of the 'guy I hate most' list," the subpoenas are "politically motivated, not legislatively motivated."

ProPublica, a newsroom [funded by progressive donors](#), said on Aug. 10 that Thomas took trips paid for by friends "who share the ideology that drives his jurisprudence."

Durbin contrasts the subpoena request to Crossfire Hurricane

Durbin contrasted the request to subpoena Crow and Leo with Republicans authorizing subpoenas for over 50 named people and an unlimited number of unnamed people in 2020.

The difference between the two subpoena requests was that the Senate Judiciary Committee has jurisdiction over the FBI, and documents were needed to figure out how Crossfire Hurricane "got off the rails." Meanwhile, GOP Senate Judiciary Committee members argue that Thomas and Alito's personal travels are outside of their jurisdiction.

If Leo and Crow refuse the subpoenas, the Senate will vote on whether to enforce them. If fewer than 60 senators vote to move forward with enforcement, the subpoenas will be nullified.

 [View comments \(39\)](#)

Up next

Exhibit 1

No. 22-7695

Related Application No. 22A981

IN THE SUPREME COURT OF THE UNITED STATES

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

V

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

**CERTIFICATE OF SERVICE OF PETITIONER MEGHAN KELLY'S
SECOND PETITION FOR A REHEARING ON DENIAL OF A WRIT OF CERTIORARI
LIMITED TO INTERVENING CAUSES OF SUBSTANTIAL OR CONTROLLING
EFFECT CONCERNING MY ARGUMENTS AND OTHER CLAIMS NOT
PREVIOUSLY CONSIDERED WHICH MAY VITIATE MY RIGHTS SHOULD THE
COURT NOT HEAR THIS REHEARING**

I Meghan Kelly, Esq., certify that on Dec. 1, 2023 I sent the above

referenced document to the following addressee via US Mail

Harriet R. Brumberg
Office of Disciplinary Counsel
1601 Market Street 3320
Philadelphia, PA 19103

Dated

Dec 1, 2023

Respectfully submitted,
/s/Meghan Kelly 
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
(302)278-2975
US Bar Number 283696

Under Religious Protest, I declare that the foregoing statement is true and correct.

Dated:

Dec. 1, 2023

Meghan Kelly

(printed)

Meghan Kelly

(signed)



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No. 22-7695

Related Application No. 22A981

IN THE SUPREME COURT OF THE UNITED STATES

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

v

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

**PETITIONER MEGHAN KELLY' SECOND PETITION FOR A REHEARING ON
DENIAL OF A WRIT OF CERTIORI LIMITED TO INTERVENING CAUSES OF
SUBSTANTIAL OR CONTROLLING EFFECT CONCERNING MY ARGUMENTS
AND OTHER CLAIMS NOT PREVIOUSLY CONSIDERED WHICH MAY VITIATE
MY RIGHTS SHOULD THE COURT NOT HEAR THIS REHEARING**

November 30, 2023

/s/Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
Pro Se
meghankellyesq@yahoo.com
(302) 278-2975
US Supreme Court No 283696

QUESTION PRESENTED

I. Should this Court grant my request for a rehearing under Rule 44 because intervening circumstances of a substantial or controlling effect have arisen relating to my arguments in the petition at Question IX, pages 6-14, wherein I argued this court must limit discipline of the US Supreme Court justices to the purview of the Constitution to 1) cases and controversies, 2) and impeachment, without waiver of the 5th Amendment right to self-incrimination in order not to violate my fundamental 1st Amendment right to petition to defend my religious beliefs as a party of one based on retaliation for correcting judicial mistakes or misconduct but for government animus for my religious-political beliefs by placing my retired license on inactive disabled retired, including the Court's passage of a judicial Code dated November 13, 2023.

II. Should this Court grant my request for a rehearing under Rule 44 because intervening circumstances of a substantial or controlling effect have arisen relating to my arguments contained in the supplemental brief submitted to the court in person, via email to Emergency Clerk and electronically on November 6, 2023, which was neither accepted or rejected or reopened per my Application swiftly filed on November 15, 2023 in deprivation of my 1st Amendment right to petition and opportunity to be heard fully at the November 13, 2023 conference by not accepting or rejecting my Supplemental Brief containing new and additional information necessary for the outcome of the conference, or providing a rejection with sufficient notice of defects and opportunity to cure defects in accordance with case law.

III. Whether this Court violated my right to procedural due process by not docketing previous petitions it docketed in other cases without sufficient notice as to the reasons why the items were not docketed but mere vague cites the rules do not permit filing of this, given this

Court indicated it has jurisdiction to hear a certain petition in another case in violation of Equal protections, procedural due process and the 1st Amendment right to petition before vitiating underlying fundamental rights and other claims,

IV. Given I preserved the claim Justice Alito's denial of time prevented me from including additional claims should I be permitted to include the additional claims including the Claim the Clerk of the PA Supreme Court violated my right to procedural due process by committing a structural error by not docketing certain motions in violation of my 1st Amendment right to petition applicable to the state pursuant to the 14th, and the 14th Amendment right to a fair proceeding.

V. Whether the PA reciprocal Order, which is based on a defective DE Order is void or voidable due to clear violations of my Constitutional rights by the State of Delaware's Supreme Court and the Board the reciprocal PA Order of disability retired is based given I was not previously able to provide these arguments due to the deprivation of a time needed due to Justice Alito's denial of time.

LIST OF PARTIES

All parties appear in the caption of the case on the cover page.

CASES DIRECTLY RELATING TO THIS CASE

Kelly v Swartz, et al, Delaware District Court No. 21-1490, and Third Circuit Court of Appeals Matter No 21-3198. US Supreme Court filings Kelly v Swartz et al 22A747, Kelly v Swartz et al. 22-6783, Kelly v Swartz et al. 23A100.

Kelly v Trump Chancery Court No. 2020-0809, Delaware Supreme Court No. 119-2021, US Supreme Court No. 22-5522

Kelly v Democrats Delaware Chancery Court No 2020-0157.

The Original disciplinary case in Delaware Supreme Court matter No. 22-58 and IMO Meghan Kelly Number 541 regarding to appointment of counsel where I was denied copies or access to the filed pleadings. US Supreme Court application 22A476 Kelly v DE Office of Disciplinary Counsel.

Reciprocal disciplinary case Eastern District of PA matter No 22-45, Third Circuit Court of Appeals No. 22-3372.

Reciprocal Disciplinary case I believe is stayed Delaware District Court No. 22-341.

Reciprocal Case in the Third Circuit Court of Appeals 22-8037. Reciprocal disciplinary case before the US Supreme Court Kelly v Third Circuit Court of Appeals No. 22-6584 and application No. 22A478.

PA Supreme Court No 2913 DD3, US Supreme Court filing Kelly v Pennsylvania Office of Disciplinary Counsel US Supreme Court Numbers 22A981, 22-7695

DC and the US Supreme Court have refrained from discipline, DC based on jurisdiction.

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APPENDIX

77th Affidavit update, dated 9/6/23, filed in DE District Court 21-1490 Docket Item (hereinafter “DI”), 192 with exhibits thereto including

- Exhibit 1 docket Petitioner’s Motion to Correct an error in Kelly’s petition for writ of certiorari in Kelly v PA ODC No. 22-7695, dated 9/6/23
- Exhibit A thereto, the Federal reserve reduced the limit of reserves to 0 instead of the normal 10 percent setting up banks to crash
- Exhibit B Great Narrative excerpts about eliminating paper money, and eliminating the rule of law’s restraints on central banks control of money and debt
- Exhibit C Senator Whitehouse’s complaint and Attorney Rivken’s Rebuttal
- Exhibit 2 Email to Robert Meek and opposing counsel with copies of the November 6, 2023 filings dated Sept. 6, 2023
- Exhibit 3 Proof of Mailing the Sept. 6, 2023 supplemental brief to opposing counsel sheet for Kelly v PA ODC, 22A478.....4, 5

104th Affidavit and Exhibits thereto including

- Exhibit A Email notification indicating my petition was converted into a mere application of for more pages. In Kelly v Patricia B. Swartz, No. 23A361, with docket.
- Exhibit B January 27, 2023 rejection of my Petition to exceed the page limit for the appeal of the original DE Disciplinary rejected with other motions
- Exhibit February 7, 2023 rejection of my petition in the DE case since I filed the petition of more pages prior to and not simultaneously therewith
- Exhibit December 2, 2022 letter rejecting leave to file a different motion for in forma pauperis dated December 2, 2022
- Exhibit D 101st Affidavit, with exhibits thereto including the 3 electronic receipts of filing in the civil rights case in Exhibits 1,
- Exhibit 2, email, with attachments of submission if civil rights case
- Exhibit 3, Docket PA this matter as of 5/9/2023, docket corrected, Certificate of Compliance PA case
- Exhibit 4 US Supreme Court drop of receipts dated October 18, 2023 of PA and civil rights filings
- Exhibit 5 pictures of the boxes I dropped off, Exhibit 6 Pictures of vultures destroying the house by ripping off shingles
- Exhibit D Robert Meek Corrected PA filing defect to preserve my 1st, 5th and 6th Amendment rights
- Exhibit E 30th Affidavit regarding the 11th and 12th Affidavits in this PA case missing
- Letter to resubmit Justice Alito denied application to correct the docket to Justice Jackson

- 96th Affidavit US Supreme Court clerk indicated I may use more than one electronic filing
- Exhibit 1 email with petition for a rehearing
- Exhibit 2 October 5, 2023 letter Box 3, and email
- Exhibit 3 October 5, 2023 letter Box 2, and email
- Exhibit 4 Electronic filings connected with civil rights submission of 33 boxes
- Exhibit 5 October 2, 2023 Letter petition denied
- Exhibit 6 Docket sheet in this case
- Cert of service of internal exhibit
- Exhibit F email regarding filing civil rights case
- Exhibit G electronic copies of civil rights case submitted to Robert Meek of the US Supreme Court
- And Cert of Service.....4, 5, 9

116th Affidavit update, dated 11/15/23, filed in DE District Court 21-1490 Docket Item (hereinafter “DI”), 252 with exhibits thereto

- Receipt of November 6, 2023 11 boxes of the supplemental brief stating “Received Supreme Court Police Office November 6 P 7:19
- Email to Emergency Supreme Court Clerk Robert Meek, dated November 15, 2023 regarding I submitted and mailed out an Emergency Application to reopen 22-7695 to consider Supplemental Brief filed 11/6/23 in order not to deprive me of 1st Amend right to petition fully & fairly in accordance w/5th Amend before eliminating 1st Amend rights to religious beliefs & license
- Attachment of Emergency Application to reopen 22-7695 to consider Supplemental Brief filed 11/6/23 in order not to deprive me of 1st Amend right to petition fully & fairly in accordance w/5th Amend before eliminating 1st Amend rights to religious beliefs & license
- Petitioner Meghan M. Kelly’s Supplemental Brief to provide additional information not previously available on how private partnerships with the UN is schemed to be used to eliminate judicial authority in open and by stealth, Petitioner’s belief the courts are in danger especially with the debt ceiling approaching November 17, 2023 with no agreement to date, and the convening of Congress October 19, 2023 to attack Justice Thomas and the integrity of the court by subpoenaing witnesses to be used against Justice Thomas and the Court, submitted November 6, 2023, excluding the exhibits thereto
- PDF of US Police Office’s receipt dated Nov. 6, 2023
- PETITION FOR A REHEARING ON DENIAL OF A WRIT OF CERTIORI LIMITED TO INTERVENING CAUSES OF SUBSTANTIAL OR CONTROLLING EFFECT CONCERNING MY ARGUMENTS WHICH MAY VITIATE MY RIGHTS SHOULD THE COURT NOT HEAR THIS REHEARING, dated 10/10/23
- Petitioner Respondent Meghan Kelly’s petition for writ of certiorari to appeal the Pennsylvania Supreme Court dated February 28, 2023, submitted May 30, 2023
- Email to Lisa Dolph DE Supreme Court Clerk regarding an update on public status
- 14th Affidavit exhibits thereto,

- Exhibit 1 thereto US Supreme Court docket Sheet dated 11/13/23 showing the Nov 6, 2023 Supplemental Brief was not docketed to be considered,
- Exhibit 2 News Article US Supreme Court passed a code of ethics,
- Attached code of ethics, dated November 13, 2023
- Exhibit 3 Newspaper articles regarding Congress's censorship of Congress person Rashida Tlaib's representative viewpoint in deprivation of a segment of her constituents representation,
- Exhibit 4 and 5 concerning the creation of the Federal Reserve, 16th Amendment and Income Tax in 1913, the creation of the IRS in 1953 regarding beliefs contained in affidavit
- E-mail to Robert Meek Nov 6, 2023 email request that Robert Meek present the emailed version to the justices and my request they be submitted in an expedited fashion so as not to deprive me of the opportunity to be heard
- 92nd Affidavit regarding meg's concerning about preserving the checks and balances by preserving the pay of the court in a shut down and thoughts on a lawsuit against Biden and Yellen to preserve their pay
- Certificate of Service of Application with postage receipt.....2, 3
- **121st Affidavit, dated 11/19/23, (DI 257) regarding the DE District Court preserved and did not violate the 1st and 5th Amendment by deprivation by constructively staying and not assigning the disciplinary case as outlined in the 72nd affidavit which is attached, and exhibits thereto including**
- Email to David Rivkin concerning joining the PA case with forwarded emails from opposing counsel and the court,
- Article concerning the Senate Judiciary delays votes on subpoenas over Supreme Court Ethics, dated Nov. 9, 2023,
- the 72nd affidavit dated 8/24/23
- Civil Case Reciprocal docket IMO Kelly 22-341 in DE District Court
- Docket Item 13 of Case 22-341, Order /28/23 transferring my retired PA license which has been retired from PA since 2018 from retired to inactive disabled retired
- Docket Item 14 from PA order denying a slew of motions including motion to place on the docket motions not docketed.
- Certificate of service dated 11/19/23.....

123rd Affidavit, dated Nov 22, 2023, DI 259 regarding concerns about government backed religious views, mistakes by Courts that are deadly and the use of bankruptcy remote entities to conceal bad debt to be resold in a criminal scheme to prevent central banks and non-government entities from being scathed in an economic crash and to be used as a tool to overthrow the government, filed under seal under DI 260.....2, 3, 4, 6

124th Affidavit, regarding unaccountable Nov 6th Supplemental Brief, and other documents the US Supreme Court did not file, and PA Supreme Court filings not docketed

- Exhibit A filings in red not accessible to me on the electronic filing system

- Exhibit B , *Petitioner Meghan M. Kelly’s Motion for an exemption from the requirement to serve 10 paper copies of pleadings with this Court pursuant to Rule 12(2), 29(1), and 39(2), by the filing of one paper copy, and in addition to, or in the alternative of, permission to serve the United States Supreme Court electronically without a paper copy for future filings, due to costs relating to printing, mailing and transporting pleadings to the Post Office, creating a substantial burden upon my access to the Court’s to defend my exercise of fundamental rights, and forced violation of religious beliefs by the threat of indebtedness* submitted to the US Supreme Court but not docketed and letter of return
- Exhibit C *Petitioner Meghan M Kelly’s Motion for permission to use electronic filing before this Honorable Court, even if my active license to practice law is suspended, in representing myself, in appeals of State Disability Proceedings and in a potential Disability proceeding before this Court, and in all proceedings I act pro se in, including civil rights proceedings and for a waiver of the paper original requirement, to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, and compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights* was similarly rejected for filing per the attached letter.
- Exhibit D *undocketed Petitioner Meghan Kelly’s Motion for Leave to file Different in Forma Pauperis Motion to waive costs due to utter poverty, and due to foreseeable costs creating a substantial burden upon Petitioner’s access to the courts and forced violation of her religious beliefs by threat of indebtedness*
- Exhibit E *undocketed Petitioner Meghan Kelly’s Motion to exempt costs and waive Court fees under Supreme Court Rules 38 and 43 eliminate people lawyers and people judges by creating a foundation of immunity from debt or responsibility*
- Letter to the US Supreme Court invoking the 5th Amendment wherein the US Supreme Court indicated they did not want any more boxes and to stop sending them reciprocal discipline or disciplinary documents. The Court indicated my invocation of the 5th was sufficient.
- Law review article where the US Supreme Court accepted multiple petitions for rehearing and sua sponte accepted previously denied petitions by reopening cases
- Email to opposing counsel.....2, 3, 5

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STATEMENT OF CASE

I, Meghan Kelly, Esq., pro se pursuant to Rule 44 respectfully move this Court for a rehearing on its decision denying my Petition of writ of certiorari to vacate a PA judgement dated 2/28/2023 (“petition”) placing my license on inactive retired disabled, denying the petition for a rehearing submitted 10/18/23 on 11/13/23 while depriving me of the 1st Amendment right to petition by neither accepting or rejecting the supplemental brief provided in good faith prior to the 11/13/23 conference, necessary and material for this court’s determination at the 11/13/23 conference in deprivation of my 5th Amendment right to procedural due process applicable to this Court and in denial of my 1st Amendment right to petition and opportunity to be heard fairly and fully before vitiating my fundamental rights and property interest in my retired PA license to practice law. I further move this Court for a rehearing pursuant to Rule 44 based on new information occurring or discovered after I filed the Petition for a rehearing and other information I was obstructed from including material to the issues on appeal before this court, and restricted to the new matters in order to safeguard my Constitutional liberties under the 1st, 5th, 6th, 13th and 14th Amendments and other claims. I incorporate herein by reference the petition, the Motion for leave to file in forma pauperis filed with the Petition for writ of Certiorari, the First Petition for rehearing and the Supplemental brief (hereinafter “Petition”) herein by reference and all exhibits attached hereto and referred to herein in their entirety and aver:

1. Since I filed the petition for a rehearing additional intervening circumstances of a substantial or controlling effect have arisen relating to arguments in the petition and additional arguments as to whether the PA reciprocal Order, which is based on a defective DE Order is void or voidable due to clear violations of my Constitutional rights by the State of Delaware’s

Supreme Court and the Board the reciprocal PA Order of disability retired is based. I was not previously able to provide these arguments due to the deprivation of a time needed due to Justice Alito's denial of time. (116th, 123rd, 124th and 125th Affidavits)

2. On 11/13/23 this Court passed a Code of ethics which I argue violates my 5th Amendment right to a fair proceeding by the partiality to the code of Ethics of the regulator even self-regulator's interests instead of the impartial application of the rule of law depriving me and others of a fair proceeding. (116th-Aff). Considering this new evidence this court must overturn its Order and find the courts may only be corrected within the purview of Constitutional limits of 1. Cases and controversies, or impeachment, without vindictive punishing me for exercising my Constitutional right to require the courts uphold not violate my asserted Constitutional, federal and state rights.

3. Further this US Supreme Court violated my 1st and 5th Amendments by denying me fair access to the courts since I filed the October 18, 2023 petition for rehearing. The Court scheduled a conference to consider the rehearing on 11/13/23. On 11/6/23, I submitted by hand delivering 11 boxes containing a Supplemental brief containing other grounds to overturn the PA Supreme Court Order. (116th-Aff) Justice Alito's denial of an accommodation in the form of time prevented me from asserting new and additional claims. (Petition).

4. I also averred material circumstances of substantial and controlling effect to the Petition that arose after the 10/18/23 appeal in the 11/6/23 Supplemental Brief that must be considered simultaneously with the petition for rehearing in accordance with Supreme Court Rule 25.6 in order not to deprive me of the 1st Amendment right to petition and the 5th Amendment full and fair opportunity to be heard before vitiation of my fundamental rights and property interest in my retired PA license to practice law in deprivation of procedural due

process. US Amend I, V. Should the court reject my good faith submission of the 11/6/23 Supplemental Brief, the US Supreme Court requires the clerk to provide me a letter noting a delinquency with time to correct any flaw, per *Becker v. Montgomery*, 532 U.S. 757, 767 (2001), given I filed the supplemental brief in good faith. That did not happen. I was denied access to the courts in submission of the supplemental brief. See, *Borough of Duryea v. Guarnieri*, 564 U.S. 379, 387 (2011) ("[T]he right of access to courts for redress of wrongs is an aspect of the First Amendment right to petition the government.").

5. Since I filed a petition for a rehearing on 10/18/2023, I reasonably thought a supplemental brief as opposed to another petition for a rehearing was an appropriate means to include material information necessary for this Court's determination at the conference since Rule 25.6 provides:

"A party wishing to present ...other intervening matter that was not available in time to be included in a brief may file... a supplemental brief, restricted to such new matter and otherwise presented in conformity with these Rules, up to the time the case is called for oral argument.

6. Nevertheless, the Court did not docket my Supplemental Brief despite timely filing it days before the submission with assurance by the police officer it would be filed in time, per the docket sheet attached hereto. (116th Affidavit).

7. On 11/15/23, I filed an Emergency Application Emergency Application to reopen 22-7695 to consider Supplemental Brief filed 11/6/23 in order not to deprive me of 1st Amend right to petition fully & fairly in accordance w/5th Amend before eliminating 1st Amend rights to religious beliefs, other fundamental rights & license(s). The Court rejected this. (116th, 124th and 25th Affidavits)

8. In *Marbury v. Madison*, 5 U.S. 137, 147 (1803) this Court held, "It is a settled and invariable principle, that every right, when withheld, must have a remedy, and every injury

its proper redress. 3 Bl. Com. 109. ” I am prejudiced by the denial of access to the courts.

Structural error includes deterrence of right to appeal. See, *Borough of Duryea v. Guarnieri*, 564 U.S. 379, 387 (2011) (“This Court's precedents confirm that the Petition Clause protects the right of individuals to appeal to courts and other forums established by the government for resolution of legal disputes. ‘[T]he right of access to courts for redress of wrongs is an aspect of the First Amendment right to petition the government.’”); *Stokes v. Delo*, 495 U.S. 320, 323 (1990) (“Delay or default by courts in the federal system must not be allowed to deprive parties, including States, of the lawful process to which they are entitled. ”)

9. I respectfully request this court consider the Supplemental Brief to cure my invoked 1st and 5th Amendment rights from deprivations. I attach it hereto in part in the 116th Amendment. But this Court retains the physical copies and has not sent them back to me.

10. This Court previously appeared to deny my right to petition and access to the courts by not docketed a slew of other motions I attach hereto and incorporate herein including a petition it appeared to docket in another case. (77th Affidavit, 104th affidavit, focus on exhibits in D therein, 123rd Affidavit)

11. The US Supreme Court previously docketed a petition to excuse the paper copies requirement, held it had authority to grant it, but denied it based on the facts of the case. *Snider v. All State Administrators*, 414 U.S. 685 (1974). If the Court previously docketed a petition regarding exemption from additional paper copies, indicated it had authority to consider it, it arguably has authority to consider it and docket it in my case too. It was structural error to not docket the motion.

12. Nevertheless the US Supreme Court did not docket my similar filing I attach hereto as 124th Affidavit in Exhibit B. This Court did not docket a series of filings. (DI 77, DI 104, DI 124).

13. Similarly, the PA Supreme Court Clerk Nicole Traini did not docket a number motions I discuss and attached to the Supplemental Brief including the 5th and 7th Affidavits available on the electronic docket incorporate herein by reference and in paper copies the Court retains. One concerns whether PA's denial of my asserted ADA claims relating to physical limitations where I require time not only for a fair proceeding but sought a religious objection where I assert my right to preserve my life and health as a religious exercise and asserted religious objections to professional examination and treatment violating my 1st Amendment right to access to the courts applicable to the state via the 14th Amendment and 14th Amendment right to a fair proceeding. I believe more people go to hell and harm others by blindly adhering to the science, experts and professionals in the medical profession than many other professions. I have sincere not fake, but genuine religious objections to making man and man's work by making science guide, master and God to preserve both my life and eternal life. I encourage studying and examining issues, but I sincerely believe people are misled into ignorantly harming others on their own way to hell for even teaching people to trust the experts, the doctors and the science. They may harm them to serve material gain even knowledge. I believe this makes fallible imperfect man and his work God and reflects the image of the evil one outlined in *Isaiah* 14, where he sought to be his own God. The devil teaches getting it wrong is okay so long as you learned and did not know. My God teaches many are damned to hell the last day for getting it wrong and for not knowing, not caring to know in order to love one, even those outside of your own another not commit human sacrifice of life, liberty and health to serve your own at the

expense of violating the Constitutional rights of others. Slavery should not be permitted by non-government entities and the human sacrifice by selling products that kill, or produce them in a manner that slowly poisons people to death should be corrected not ignored. Because I believe people go to hell for blindly doing what they are trained to do, their job requires, or their narrow experience requires without thinking things out to care to love others they harm, I believe Court correction may save lives of innocent victims and the souls blind wrong doers.

14. Despite my good faith invocation of the right to a fair proceeding under the 14th, the Clerk refused to docket my petition because my 1st Amendment rights to religious beliefs were “unusual.” This Court in *United States v. Finnell*, 185 U.S. 236, 249 (1902) held, “The clerk is a ministerial officer, and, without statutory authority, can exercise no judicial functions.” Accordingly, it was improper for the clerk to deprive me of asserted fundamental rights by performing a judicial function. This error is structural.

15. I seek to preserve the Courts not destroy them when I petition to correct judges or staff within them to preserve my rights and the rights of others to buy and sell which should not be eliminated but for religious belief in Jesus as God, not money as God or for some other Constitutionally asserted right as in the Delaware attorney Richard Abbott’s case.

16. Richard Abbott is a Delaware Attorney who was similarly punished on November 9, 2023 for asserting the right to petition without the Court’s violations of Equal Protections by deeming attorneys unprotected by the law based on viewpoint of the speech, with partiality towards the government and itself. Abbott has colorable claims and should be afforded a stay as Chief Judge Colm F Connely constructively granted me per Affidavit 121 attached hereto so as not to deprive Abbott of the 1st Amendment right to petition in the only impartial forum that may grant him relief by compelling his guilt is assumed and he must be proven innocent. Abbott was

punished for representing a rich client who previously retained 4 or 5 other lawyers and glutted Chancellor Vice Glascock's docket. He was punished for his client's annoyance which is wrong. His duty is to represent his client's interest, even I suspect in his case personal interest against psychological pressure by assigning the property right in issue to another to alleviate the burden upon the one he represents.

17. It is unfortunate clients may turn on their counsel too, and believe because of their wealth they may buy justice. Abbott should not be penalized for he misconduct of his client who wore the court out with 4-5 other attorneys and years of litigation before Abbott accepted the case, nor is Abbott unworthy of Equal Protections to all attorneys similarly before the court regardless of the amount of revenue brought in and firm size. He is not a throw away product. He is a person worthy of dignity and respect.

18. I was thinking about interpleading in the Abbott's case to prevent his disbarment to represent me though he is free to say no. He is not a slave. US Amend XIII. Nevertheless, this Court held there is a fundamental right to counsel of one's choice. In *Greer v. United States*, 141 S. Ct. 2090, 2100 (2021), this Court held, "Structural errors are errors that affect the 'entire conduct of the [proceeding] from beginning to end.'" *Arizona v. Fulminante*, 499 U.S. 279, 309 (1991). "The 'highly exceptional' category of structural errors includes, for example, the 'denial of counsel of choice, denial of self-representation, denial of a public trial, and failure to convey to a jury that guilt must be proved beyond a reasonable doubt.'" *Id.* Per this cite, the DE order violates procedural due process by denying me the right to self-represent until fewer than two work weeks before the hearing when I fell ill with the shingles and asserted I needed time to prepare to gather the hidden evidence. *Id.* Thus, the PA Order must be vacated.

19. I seek additional new claims to vacate the PA Order on disability based on the original Disciplinary proceeding depriving me of a fair opportunity to be heard per the attached Civil rights Complaint and civil rights appeal and petition for additional pages I incorporate herein.

20. DE punished me in retaliation for my exercise of fundamental First Amendment rights of the right to petition, religious belief, association, exercise of belief, and speech by eliminating my right to buy and sell by deeming my religious belief in Jesus not mammon as God. *Matthew* 6:24.

21. In *Borough of Duryea v. Guarnieri*, 564 U.S. 379, 386-387 (2011) This Court held,

“There are some rights and freedoms so fundamental to liberty that they cannot be bargained away in a contract for public employment. ‘Our responsibility is to ensure that citizens are not deprived of [these] fundamental rights by virtue of working for the government.’...the Petition Clause protects the right of individuals to appeal to courts and other forums established by the government for resolution of legal disputes. ‘[T]he right of access to courts for redress of wrongs is an aspect of the First Amendment right to petition the government.’”(omitted internal citations)

22. This Court must extend *Guarnieri* to mean the government may not contract away my right to petition to assert 1st, 5th, 6th, 13th and 14th Amendment rights and other claims including my 1st Amendment right to religious belief in Jesus in exchange for a license to buy and sell as a lawyer.

22. Moreover I was denied 14th Amendment procedural due process in DE proceeding. The Court prevented me from cross examining my accusers by denying my motions to call them concealed evidence in my favor and fired two court staff by forcing them into retirement to conceal their testimony in my favor. (See Civil rights Appeal) In *Greene v. McElroy*, 360 U.S. 474, 475 (1959), “this Court will not hold that a person may be deprived of

the right to follow his chosen profession without full hearings where accusers may be confronted and cross-examined” Therefore the denial of my asserted 6th Amendment right to cross examine Arline Simmons was a structural error in the originating DE disciplinary proceeding.

23. This Supreme Court deprived me of an opportunity to appeal DE decision by denying me time in the form of a stay and by vitiating my rights to access to this court in the original DE proceeding by depriving me of time in this case too. Per the attached petition for more pages the DE Supreme Court violated its own rules by providing me with fewer days than the rules require to reasonably subpoena the witnesses and ignored motions until 2 days before the proceeding, while permitting the DE ODC to violate rules which prejudiced me.

24. This appeal also relates to Delaware’s punishment of me disparately in contravention of the 1st Amendment for private speech, religious beliefs, association and claims outlined in my Religious Freedom Restoration Act petitions, where my religious belief is material to the issues therein. The disparate treatment, denying me access to pleadings in a case against me IMO appointment of counsel No 541, and other deprivations was based on subject matter grounds of disagreeing with my religious belief. This Court held in *Gentile v. State Bar of Nevada*, 501 U.S. 1030, 1054 (1991), “At the very least, our cases recognize that disciplinary rules governing the legal profession cannot punish activity protected by the First Amendment, and that First Amendment protection survives even when the attorney violates a disciplinary rule he swore to obey when admitted to the practice of law.” By denying me the opportunity to be heard fairly and fully at the DE Order is void, and the PA order must be vacated.

Wherefore I pray this Court grants this petition.

11/30/23

Respectfully Submitted,
/s/Meghan Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive

Dagsboro, DE 19939,
(302) 278-2975
meghankellyesq@yahoo.com,
US Supreme Court Number 283696

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

Dated: 11/30/23

(printed)

Meghan Kelly

(signed)

CERTIFICATION OF COUNSEL (RULE 44)

I certify that the Petition for Rehearing from Denial of Certiorari is presented in good faith and not for delay and is restricted to the grounds specified in Supreme Court Rule 44.

Dated: 11/30/2023

Respectfully Submitted,
/s/Meghan Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939,
(302) 278-2975
meghankellyesq@yahoo.com,
US Supreme Court Number 283696

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

Dated: 11/30/23

Meghan Kelly
(printed) C. Meghan Kelly
(signed)

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

Meghan Kelly	)	Civil Action No.: 1:21-1490 (CFC)
Plaintiff,	)	
v.	)	
Disciplinary Counsel Patricia B.	)	
Swartz, et.al	)	
Defendants.	)	

PLAINTIFF MEGHAN KELLY'S 124th AFFIDAVIT UPDATE

Comes now Plaintiff Meghan Kelly, I declare and affirm that the foregoing statement is true and correct.

1. I apologize for the typos in the 123rd affidavit. I was writing in haste without sleep I was so upset and remain upset.

2. On November 23, 2023 I checked the electronic filing side and saw that my application to emergency clerk Robert Meek and Justice Alito were rejected for filing as of November 23, 2023. (Exhibit A). Since I was eagerly checking every day and this is the first I saw rejection. It is possible it may have been rejected because it was in letter format, but other applications to emergency clerk's were similarly submitted and accepted.

3. I left a message with Lisa Nesbitt and Robert Meek to gain clarification on the rejection and to swiftly correct any deficiency so as not to waive my rights on November 23, 2023.

4. On November 23, 2023 I also called the efiling staff at the US Supreme Court regarding another issue why I could not access the electronic filing on the Nov 6th Supplemental brief that I dropped off at the US Supreme Court in person, which to date has not been accounted for. Per Exhibit A, you can see the documents in red are inaccessible to me on the electronic filing system. The efiling clerk sought to dissuade me from exercising my 1st Amendment right to petition regarding the application to Alito indicating the case was closed and was over. I

responded I must assert my right, and reopen it. Then she indicated that was off topic since it was not electronic filing, while I remained silent and she quickly concluded and hung up on me before I could say good bye. As an attorney, I know some argue if you do not dispute allegations they may be deemed admissions incorrectly, though they shouldn't be. I was not off topic merely rebutting her assertions.

5. I am freaked out Nicole Traini, the Clerk of Court for the PA Supreme Court in Pittsburgh, PA indicated the clerk's talk to one another. The PA Court inappropriately denied my motions relating to my assertions for accommodations for my religious beliefs and health, which I averred in the Supplemental brief while attaching proof of the deprivation of my procedural due process applicable to the state via the 14th Amendment. I even asserted an ADA accommodation because I want to die for the vanity of lawless man whose evil eyes are focused on convenience, avoidance of costs, at the exchange of sacrificing of the lives and liberties they swore an oath to protect by upholding the constitution. See Matthew 6:22-23 concerning Jesus's teachings of the evil eye revealing a dirty covetous heart not full of love but yucky lusts for comfort and material gain indifferent of harm or human sacrifice of life, liberty or health of other people God loves. This is a type of lawlessness that leads to certain damnation in the fires of hell without repentance, even thinking this way is sin to God.

6. I believe it was wrong for the US Supreme Court staff to reject motions I filed simultaneously with petitions for writ of certiorari by not docketing it, just like I believe it was wrong for the PA Supreme Court to not docket motions I filed merely because they thought my accommodations for time based on religious beliefs in part my exercise of the right to live without harm to health is a religious exercise and to prevent vitiating my access to the courts to fairly petition to defend fundamental rights but for the denial of the accommodation in the form

of time, and exemptions of costs on religious grounds against compelled violations of one fundamental right in exchange for another when freedoms are not for sale despite the lies of the devil which misguided, lawless people teach that you must buy or earn that which is free. Not everyone is a child of God. We are all born children of the devil, in need of salvation from death. *Psalms* 51:5 states that we all come into the world as sinners: “Behold, I was brought forth in iniquity, and in sin my mother conceived me.” *Ephesians* 2:2 says that all people who are not in Christ are “sons of disobedience.” *Ephesians* 2:3 also establishes this, saying that we are all “by nature children of wrath.” Not all people are born again and made clean by repentance, but we all have a choice we must independently each make. See, *Deuteronomy* 30:19 (“I call heaven and earth to record this day against you that I have set before you life and death, blessing and cursing. Therefore choose life, that both thou and thy seed may live”)

7. The PA Clerk did not docket the motions. Josh the case manager for the matter indicated the judges will not review items not docketed as filed. Similarly, the supplemental brief was not docketed or rejected. It matters not that the US Supreme Court may choose to look at undocketed submissions. Just like Josh indicated they placed my undocketed in PA Supreme Court motions in the sleeve of the file, the US Supreme Court will not review undocketed information especially in light of reviewing hundreds of filings at one conference. I was deprived of a fair opportunity to be heard in violation of procedural due process applicable to the US Supreme Court because it neither accepted or rejected the November 6th filing . It was not docketed as of the date of the conference despite the rules indicating it would be deemed considered so long as I submitted it prior to the date of finality. Rule 25.6.

8. I am eager to see whether the court explained the deficiency with regards to the application to reopen the case as not to deprive me of procedural due process in the US Supreme Court matter.

9. I am concerned the Court may be trying to insulate the lower courts from being bound by the Constitutional Rule of law to aide PA Courts and itself as a partial forum to rebut an argument contained in the unaccounted for Nov. 6, 2023 petition, *Petitioner Meghan M. Kelly's Supplemental Brief to provide additional information not previously available on how private partnerships with the UN is schemed to be used to eliminate judicial authority in open and by stealth, Petitioner's belief the courts are in danger especially with the debt ceiling approaching November 17, 2023 with no agreement to date, and the convening of Congress October 19, 2023 to attack Justice Thomas and the integrity of the court by subpoenaing witnesses to be used against Justice Thomas and the Court, dated 11/6/23, regarding denying the 1st Amendment right to petition by not docketing pleadings.*

10. I filed a bunch of motions with the US Supreme Court which I believe were not docketed in error as a matter of law I suspect to create precedent for the PA Supreme Court clerk's error, including a petition to exempt the paper copy requirement.

11. The US Supreme Court previously docketed a petition to excuse the paper copies requirement, held it had authority to grant it, but denied it based on the facts of the case. *Snider v. All State Administrators*, 414 U.S. 685 (1974) ("While we undoubtedly have authority to waive the application of particular rules in appropriate circumstances, we have during this Term denied a considerable number of similar motions. Typically in each of these cases the moving petitioner made generalized allegations of inability to afford payment of printing costs, but made no showing sufficient") My case is distinguished from the case where the court denied the

request to eliminate paper copies in order to assert the need is to protect my 1st Amendment right to religious belief in addition to access to the courts and other claims, which this claimant did not appear to do sufficiently. *See, Snider v. All State Administrators*, 414 U.S. 685 (1974)

(“Petitioner Snider has filed a motion to dispense with the printing of the petition for certiorari as required by our Rule 39. He has filed no motion and affidavit”) If the Court previously docketed a petition regarding exemption from additional paper copies, indicated it had authority to consider it, it arguably has authority to consider it and docket it in my case too.

12. Nevertheless the US Supreme Court did not docket my similar filing I attach hereto as Exhibit B and incorporated herein by reference please find, *Petitioner Meghan M. Kelly’s Motion for an exemption from the requirement to serve 10 paper copies of pleadings with this Court pursuant to Rule 12(2), 29(1), and 39(2), by the filing of one paper copy, and in addition to, or in the alternative of, permission to serve the United States Supreme Court electronically without a paper copy for future filings, due to costs relating to printing, mailing and transporting pleadings to the Post Office, creating a substantial burden upon my access to the Court’s to defend my exercise of fundamental rights, and forced violation of religious beliefs by the threat of indebtedness* and per the US Supreme Court letter rejecting the filing for docketing also attached hereto. (Exhibit B).

13. Similarly the attached *Petitioner Meghan M Kelly’s Motion for permission to use electronic filing before this Honorable Court, even if my active license to practice law is suspended, in representing myself, in appeals of State Disability Proceedings and in a potential Disability proceeding before this Court, and in all proceedings I act pro se in, including civil rights proceedings and for a waiver of the paper original requirement, to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, and compelled violation*

of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights was similarly rejected for filing per the attached letter. (Exhibit C)

14. The attached *Petitioner Meghan Kelly's Motion for Leave to file Different in Forma Pauperis Motion to waive costs due to utter poverty, and due to foreseeable costs creating a substantial burden upon Petitioner's access to the courts and forced violation of her religious beliefs by threat of indebtedness* was also rejected for filing, per the letter rejecting it.

15. The attached *Petitioner Meghan Kelly's Motion to exempt costs and waive Court fees under Supreme Court Rules 38 and 43 eliminate people lawyers and people judges by creating a foundation of immunity from debt or responsibility* incorporated herein as Exhibit E was also rejected for filing. My case manager indicated I would be required to exempt costs in my *informa pauperis* motion which I have complied with since learning she would not accept it despite my belief the Court should judge the motion, not the clerk. After all the Supreme Court has held every injury should have a resolution. *Marbury v. Madison*, 5 U.S. 137, 147 (1803) (“It is a settled and invariable principle, that every right, when withheld, must have a remedy, and every injury its proper redress. 3 Bl. Com. 109.”). There is no resolution when petitions are not docketed just injustice by partiality by those who value lawless lusts convenience and material gain at the cost of human sacrifice of life, health or liberty. Lawyers and parties must require the courts uphold and not violate the Constitutional rule of law as well.

16. I also attach the letter to the US Supreme Court regarding asserting the 5th Amendment. The staff kindly indicated they accepted my 5th and to please sending boxes of filings to them.

17. I discovered the bad news that my application was rejected and realized I had to tell this Delaware District court my belief it was in imminent danger by legal entities lawyers in DE create. I provided this court forms in hopes it may understand how banks and their partners may conceal and resell nothingness debt no one will pay into infinity artificially creating value in something without worth to enslave the people to pay back what those in businesses have written off in debt swaps into infinity. The entities are preserved and are bankruptcy proof, liability proof, and above the law if you will by the nature of the springing member that hops into the place of the dissolved member or manager by operation of contract, allegedly arguably shielded by the contracts clause of the Constitution at the instant of dissolution or bankruptcy. I believe these “bankruptcy remote” entities will create a foundation for an economic overthrow I believe is schemed to transition in phases, with a worse transition after 2050. These will be utilized in the Ponzi scheme fashioned off of Bank of England who fashioned it off of the Knights of Templar who fashioned it off of Babylon’s slave banking system, coining money out of nothing to require debt slavery to be paid back with interest to keep people enslaved to work to pay back the interest which can never be paid back because it does not exist. Every dollar is a federal reserve note and I owe you to the federal reserve. The Government and the people are essentially debtor slaves and not free people for every dollar the government uses by borrowing from an entity that gains more power the worse off we are in by debt money the government gives to other entities, private who accept unjust gain government contracts or grants, in a forced not fair or free economy with limits in the form of the just rule of law that tame the beast sin business greed to prevent killing, oppressing, enslaving, stealing and destroying human life, health and liberty for the bottom line with justice in the courts to correct, preserve life and liberty, not destroy humanity.

18. Understand, the time to pay debt owed for the biggest bill falling due globally for the baby boomers retirement, and healthcare is falling due, but the banks, and the empty stocks with noting but I owe you that are not likely to be paid should a bankruptcy boom occur and we move towards these dreadful beneficial entities that violate Matthew 6:1-4 which will mislead humanity to harm one another under the lie of helping the world, die to be doomed to hell should the courts not save us.

19. So, I am embarrassed for typing like the speed of lightening with my sausage fingers making typos trying to warn the court in haste. I am sorry. I am sorry for typos in this too as I write under duress.

20. Having not received a message back from my case manager, Lisa Nesbitt or Robert Meek from 11/22/23, I called both on 11/24/23 to gain clarity as to why my *Emergency Application to reopen 22-7695 to consider Supplemental Brief filed 11/6/23 in order not to deprive me of 1st Amend right to petition fully & fairly in accordance w/5th Amend before eliminating 1st Amend rights to religious beliefs & license*. I also desired clarification on why the submission on *Petitioner Meghan M. Kelly's Supplemental Brief to provide additional information not previously available on how private partnerships with the UN is schemed to be used to eliminate judicial authority in open and by stealth, Petitioner's belief the courts are in danger especially with the debt ceiling approaching November 17, 2023 with no agreement to date, and the convening of Congress October 19, 2023 to attack Justice Thomas and the integrity of the court by subpoenaing witnesses to be used against Justice Thomas and the Court*. No one answered their phone and I did not leave a message.

21. November 6, 2023 was rejected for filing and not docketed as of the date of submission. I do not know what the US Supreme Court will advise as to my undocketed rejected application dated November 15, 2023. I cannot waive my rights.

22. So, I googled the attached law review article and learned I needed to file a second Motion for a Rehearing under Rule 44.2. That is what I did in this case, I filed 3 or 4 Motions for a rehearing or reagument.

23. One Supreme Court case a petitioner filed 3 Motions for rehearing, the US Supreme Court denied it thrice, a year later the US Supreme Court vacated the denial sua sponte to address a petition. See, *United States v. Ohio Power Co.*, 353 U.S. 98 (1957) (“Certiorari denied October 17, 1955. Rehearing denied December 5, 1955. Rehearing again denied May 26, 1956. Order denying rehearing vacated June 11, 1956. Rehearing and certiorari granted and case decided April 1, 1957. ”)

24. I have been in tears since November 13, 2023, ever since the US Supreme Court denied my Petition for Writ of Cert in the PA case while depriving me of 5th Amendment Procedural Due Process by simply not accepting or rejecting the supplemental brief that must be considered with or before the Petition for rehearing per Supreme Court Rule 25.6. Should it be rejected the Court is required to permit me to cure any defects with notice of rejection. *Citing, Becker v. Montgomery*, 532 U.S. 757, 767 (2001)

25. I hope the court’s staff and opposing counsel enjoyed their time this Thanksgiving. I do not celebrate holidays because it violates God’s laws revealed to me in part through the Bible.

26. In *Mark 7:7-9* King James version Jesus explains

“7Howbeit in vain do they worship me, teaching for doctrines the commandments of men. 8For laying aside the commandment of God, ye hold the tradition of men, as the

washing of pots and cups: and many other such like things ye do. 9And he said unto them, Full well ye reject the commandment of God, that ye may keep your own tradition.”

27. In Jeremiah Chapter 10 the Old testament provides:

“1Hear the word that the LORD speaks to you, O house of Israel. 2This is what the LORD says: ‘Do not learn the ways of the nations or be terrified by the signs in the heavens, though the nations themselves are terrified by them. 3For the customs of the peoples are worthless; **they cut down a tree from the forest**; it is shaped with a chisel by the hands of a craftsman. 4**They adorn it with silver and gold and fasten it with hammer and nails, so that it will not totter.** 5Like scarecrows in a cucumber patch, their idols cannot speak. They must be carried because they cannot walk. Do not fear them, for they can do no harm, and neither can they do any good.” 6There is none like You, O LORD. You are great, and Your name is mighty in power. 7Who would not fear You, O King of nations? This is Your due. For among all the wise men of the nations, and in all their kingdoms, there is none like You. 8**But they are altogether senseless and foolish, instructed by worthless idols made of wood!** 9**Hammered silver is brought from Tarshish, and gold from Uphaz**— the work of a craftsman from the hands of a goldsmith. Their clothes are blue and purple, all fashioned by skilled workers. 10But the LORD is the true God; He is the living God and eternal King. The earth quakes at His wrath, and the nations cannot endure His indignation”

28. In Jeremiah Chapter 6 God says:

“6For this is what the LORD of Hosts says: ‘Cut down the trees and raise a siege ramp against Jerusalem. This city must be punished; there is nothing but oppression in her midst.”

29. I do not know what God means by cut down the trees. I think that men distort the word of God to give the deceptive appearance man’s will reflecting the image of the lawless one the devil is God’s will. Did you that in Israel people cut down trees because they taxed them?

30. Back to my religious beliefs. Jesus in Mark 7:8 says not to disobey God’s law to please men by their traditions. God’s laws in Jeremiah 10 says do not decorate trees with silver and gold to back the pagan worship of material things which includes Christmas trees.

31. I did not know I violated the law until Trump complained about it. He is the naughtiest most lawful man I ever observed in real life. He is likened to the dreaded King

Leopald of the Congo, Hitler or even Nero. So, I had to unhardened my heart and head and discern why Trump distorted God's word and traditions for his political material vanity.

32. The courts are misguided when they rely on England's laws or Plato's instead of a more ancient people's laws by thinking things out to discern what upholds Constitutional laws as applied to the facts of each case. See, Deuteronomy 30:19 ("I call heaven and earth to record this day against you that I have set before you life and death, blessing and cursing. Therefore choose life, that both thou and thy seed may live"). We must protect free choice under the law, even God does that or at least the Israelites did, or there is no freedom, certainly to escape the way to hell by laying down our desires, to think, to care to unconditionally love. Those who make everything a matter of barter or exchange are lawless people enslaved to lusts and death in hell, not free. And yet, the courts must protect their freedom to make bad choices with the limit they may not enslave others by oppression, killing, stealing or destroying other constitutionally protected people's lives, health or liberty.

33. The entire carbon credit debit system removes government power from the government to its private and foreign partners who will eliminate the government down the line should the courts not stop it.

34. In order to maintain freedom there must be independence not deferral to the other two branches, and independence from private and foreign partners.

35. On an aside, attached please find an email to confirm I sent the sealed documents to opposing counsel.

36. Thank you for your time and consideration of my beliefs and thoughts. I truly believe the courts are in trouble, meaning we all are in trouble. There is no freedom without people judges, just reign by lawless lusts by those who enslave a no longer free people to bend to

their dictates or go without the necessities of life. We face lawlessness under the veil of freedom by utter control and complete order, Satan's design. 1 John 5:19

Respectfully submitted,

Dated 11/24//23

Meghan M. Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com

EXHIBIT B

Some are placed on 3DI 105 not all in 21-3198, not including toc, appendices and citations
which I printed out separately

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

In the Matter of Meghan Kelly in the Third Circuit Court of Appeals

Meghan M. Kelly, Petitioner

No Respondent

Petitioner Meghan M. Kelly's Motion for an exemption from the requirement to serve 10 paper copies of pleadings with this Court pursuant to Rule 12(2), 29(1), and 39(2), by the filing of one paper copy, and in addition to, or in the alternative of, permission to serve the United States Supreme Court electronically without a paper copy for future filings, due to costs relating to printing, mailing and transporting pleadings to the Post Office, creating a substantial burden upon my access to the Court's to defend my exercise of fundamental rights, and forced violation of religious beliefs by the threat of indebtedness

I, Meghan M. Kelly, pro se petitioner filing in forma pauperis, move this honorable Court for an exemption from the requirement to serve 10 paper copies of pleadings with this Court pursuant to US Supreme Court Rules 12 (2), 29(1), and 39(2), by the filing of one paper copy to this Court, and in addition to or in the alternative of, an exemption from serving paper pleadings to the US Supreme Court, due to costs relating to printing, mailing and transporting pleadings to the Post Office, 1. creating a substantial burden upon my access to the Court to defend my exercise of fundamental rights, 2. and forced violation of religious beliefs by the threat of indebtedness.

1. Pursuant to U.S. Sup. Ct. R. 39:

"If leave to proceed in forma pauperis is sought for the purpose of filing a document, the motion, and an affidavit or declaration if required, shall be filed together with that document and shall comply in every respect with Rule 21. As provided in that Rule, it suffices to file an original and 10 copies, unless the party is an inmate confined in an institution and is not represented by counsel, in which case the original, alone, suffices. A copy of the motion, and affidavit or declaration if required, shall precede and be attached to each copy of the accompanying document."

2. A statutory exception is crafted for indigent, unrepresented imprisoned petitioners. Thus, a similar exception may reasonably be crafted to permit me to file the original copy electronically, or in the alternative, the same single original paper copy requirement afforded to indigent, unrepresented, imprisoned parties, which I argue still substantially burdens my access to the courts, and exercise of fundamental rights. *Id.*

3. There is no Respondent prejudiced by my request, nor is this Court prejudiced. Whereas, I am deeply prejudiced should my request be denied. I have allergies that mimic other sicknesses. I believe this Court is kept safer during this global pandemic, with increases in monkey pox, polio and covid-19 cases globally. Touching paper touched by sick people, even postal people, may possibly spread germs to this honorable court. I sadly recall reading about postal workers dying during the pandemic.

4. It is against my religious belief to go into debt.

5. I cannot afford to pay for printing, ink, postage and transportation costs relating to delivery of paper pleadings. Requiring I adhere to the paper requirements would compel me to go into debt, in violation of my religious beliefs against indebtedness.

6. The foreseeable costs relating to printing, transporting and mailing pleadings create a substantial burden upon my access to the Courts and forced violation of my religious beliefs by threat of indebtedness, as I seek to protect the exercise of my fundamental rights from retaliation by the government, but for the exercise of my rights, in the present case.

7. This Court has inherent equitable powers over their process to prevent abuse, oppression, and injustice. *Gumbel v. Pitkin*, 124 U.S. 131 (1888); *Covell v. Heyman*, 111 U.S. 176 (1884); *Buck v. Colbath*, 70 U.S. (3 Wall.) 334 (1866).

8. This Court must grant my request to prevent government abuse against my person, oppression, and injustice.

9. The Court appears also appears to have statutory authority to waive unconforming pleading requirements for just cause so long as it does not enlarge Constitutional rights, but safeguards and upholds the Constitutional laws. See for example, Fed. R. App. P. 2, 28 U.S. Code § 2072.

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

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

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

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

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

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

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

errors are hidden, has only the right to a meaningless ritual, while the rich man has a meaningful appeal." *Douglas*, [372 U.S., at 357-358](#)

16. The Court's normal service of original pleadings by paper requirements, violate my religious beliefs, religious practices and religious exercise against incurring debt, and costs, as applied.

17. I temporarily turned in my vehicle tags to prevent being sinfully compelled to pay for insurance I was not able to afford when it fell due, in violation of my religious beliefs.

18. In March, 2022, in Delaware, the price of gas increased to over \$4.00 a gallon due to the planned Ukraine Russia crisis used as a contributing factor to intentionally crash the economy. This is a dramatic increase in cost for gas to fuel my vehicle to travel to your Honorable Court or to the post office to drop off original paper copies.

19. Since then, the price of gas has fallen, but remains unstable due to the limits of global gas relating to the sanctions on Russia's export of fuel, since the Ukraine-Russia war erupted in February 2022.

20. I got a flat tire on my bicycle and have been compelled to temporarily restate my car insurance and vehicle tags.

21. The price of stamps also went up from 58 cents to 60 cents this summer.

22. The cost of paper went up dramatically this year, and ink is expensive.

23. The additional costs of transporting paper original copies to the post office or in person, printing paper copies and mailing create a strenuous substantial burden upon my access to the courts which may be alleviated by an accommodation in the form of a waiver of paper copies.

24. I expected to rejoin my former law firm after standing up for something more important than money in *Kelly v Trump*, my free exercise of religion, exercise of religious and

political belief, exercise of religious and political speech, and association as a party, attorney, democrat, Catholic and Christian without government incited persecution, but for my exercise of fundamental rights.

25. The Delaware Supreme Court justices in collusion with the Delaware Office of Disciplinary Counsel wrongfully brought claims against me creating a government incited economic substantial burden upon me which prejudices me by forcing me into a maintained state of poverty by preventing me from seeking to get my former position back at my old law firm as an attorney, or any work at a law firm. They harm my reputation to make me less attractive to employers.

26. Under my unique situation, the original paper copy and mailing costs cause a substantial burden upon my access to the courts to address Constitutionally protected activity relating to fundamental rights, creating an obstacle so great as to foreseeably prevent my access to the courts.

27 I do not want to sin against God by incurring debt. I believe people sin against God by incurring debt. God teaches in *Romans* 13:8 “Owe no one anything, except to love each other, for the one who loves another has fulfilled the law.” I believe it compromises our loyalty to God towards the pursuit of money to free us from bondage, as savior instead of God. Jesus teaches you cannot serve both God and money as savior. *Matthew* 6:24. I choose God. Earning money is not sin. I believe, when our desire to earn money takes the place of our desire to do God’s will by hardening our heads, hardening our hearts and hardening our hands from loving God foremost and subordinately loving others as ourselves, that is sin. I believe “the love of money is the root of all evil”. 1 *Timothy* 6:10. I believe we are taught through temptations to worship sin, the mark of the beast spoken of in *Revelation* young, by praise and profit, glorifying

work and business, and conditional giving and conditional relationships, confusing many into believing conditionally caring is unconditional love damning most of humanity to hell the last day which is sad. (See, *Revelation* 16:2, *Revelation* 20:4. By worship of the image of the beast, I believe it means absence of love, unconcern, conditionally giving to get, caring based on conditional relationships with no unconditional love, no God in them for it is written “God is love.” 1 *John* 4:16. They glorify the punishments of sin written in *Genesis* 3 as the reason to live reflecting pride, sin, instead of receiving correction through humility leading to salvation from the lake of fire, the second death.). God calls his people whores when they committed adultery with God by chasing money and material gain to care for their own, as guide, in place of God. It teaches hardness of hearts towards God and others outside of our own which is the sin against the holy spirit. In *Jeremiah* 3:3, when God said “You have a forehead of a whore,” I think it means people have money, material gain, merriment, on their mind, not God’s word teaching us to love by overcoming the lusts of man. See, *Ezekiel* 16:33, *Ezekiel* 16:28. Jesus scolds us when we exchange our lives to gain the world through money. *Mark* 8:36-38

28. I believe creditors, merely doing what they are blindly paid to do, will be damned to hell for not forgiving monetary debts, should they not repent. (See, *Matthew* 6:12, “And forgive us our debts, as we also have forgiven our debtors.”); (*Matthew* 6:14-15, “For if you forgive other people when they sin against you, your heavenly Father will also forgive you. But if you do not forgive others their sins, your Father will not forgive your sins.”); (*Deuteronomy* 15:1, “At the end of every seven years you must cancel debts.”); (See also, *Matthew* 18:21-35. Debts once forgiven will be remembered if we do not forgive others.); (Jesus teaches “What good will it be for someone to gain the whole world, yet forfeit their soul? Or what can anyone give in exchange for their soul?” *Matthew* 16:26.); (Jesus teaches us do not seek after material

things, “but seek first his kingdom and his righteousness, and all these things will be given to you as well.” *Matthew* 6:30-33.); (With regards to eternal treasure we are commanded to share his word without pay as without pay we received the gift of the way to eternal life, through the word. *Citing, Matthew* 10:8).

29. If people don’t forgive monetary debts, I believe people will be damned to hell for loving money and material gain more than one another as commanded. We are commanded to love people, not money and the things it can buy. (See, *John* 13:34-35, “A new command I give you: Love one another. As I have loved you, so you must love one another. By this everyone will know that you are my disciples, if you love one another.”)

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

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

32. Charging interest or a fee on money lent or artificial debt is a sin against God, I believe misleading many to hell by indebtedness to the pursuit of money, instead of God. (*Ezekiel* 18:13, “He lends at an interest and takes at a profit. Will such a man live [By live, I believe it means losing eternal life in the second death should he not repent]. He will not!

Because he has done all these detestable things, he is put to death; his blood will be on his own head.”); (*Deuteronomy* 23:19, “Do not charge your brother interest on money, food, or any other type of loan.”); (*Proverbs* 28:8, He who increases his wealth by interest and usury lays it up for one who is kind to the poor.); (*Exodus* 22:25, “If you lend money to one of my people among you who is needy, do not treat it like a business deal; charge no interest.”); (*Deuteronomy* 15:2, “This is the manner of remission: Every creditor shall cancel what he has loaned to his neighbor. He is not to collect anything from his neighbor or brother, because the LORD's time of release has been proclaimed.”)

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

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

35. Going into debt, of even a few dollars, is against my religious belief, and the additional costs of even a few dollars in transportation to appear in person is a substantial burden upon my access to the courts due to my utter poverty, and my inability to pay back any fees should I fail, ever.

36. I respectfully request that, due to original paper copy costs creating an economic strain upon my exercise of religious beliefs against indebtedness and exercise of my access to the courts to defend First Amendment rights, as a substantial burden due to my poverty and religious beliefs, with little prejudice to the Court, that I be permitted to serve original copies of pleadings electronically, without copies.

37. This Court must not require I violate my religious beliefs by agreeing to personal indebtedness as unaffordable costs for transportation arise, in order to exercise my First Amendment right applicable to the Court via the Fifth Amendment, to petition this Court to safeguard my exercise of Constitutionally protected activity from government interference or retaliation including the right, to petition, exercise religious beliefs, freely speak concerning my religious beliefs for which my petitions relate to and the freedom to associate as a party, attorney, Democrat, Christian, with independent, individual, unique political-religious beliefs.

38. In order for this Court to require I accrue additionally 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 filing paper copies, the Court must have a compelling interest somehow more important than the free exercise of religion, narrowly tailored to support such interest.

39. The Court must 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 of paper copies to prevent the government forced violation of my religious beliefs.

Wherefore, I, Meghan M. Kelly, respectfully asserts this Court must grant this motion.

Dated

Respectfully submitted,

Meghan Kelly, Esquire
DE Bar Number 4968
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
(302) 493-6693
(3,094 Words)

US Supreme Court Bar No. 283696

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

Dated:

_____(printed)

_____(signed)

**SUPREME COURT OF THE UNITED STATES
OFFICE OF THE CLERK
WASHINGTON, DC 20543-0001**

December 2, 2022

Meghan Kelly
34012 Shawnee Drive
Dagsboro, DE 19939

RE: Motion for an Exemption from Rule 12.2

Dear Ms. Kelly:

The motion for an exemption from the Court's Rule 12.2 was received November 29, 2022 and is returned for the following reason:

The Rules of this Court make no provision for this request. You must provide an original and 10 copies of your petition for a writ of certiorari and motion for leave to proceed in forma pauperis. Rule 12.2.

Sincerely,
Scott S. Harris, Clerk
By:



Lisa Nesbitt
(202) 479-3038

Enclosures

No. 22-7695

Related Application No. 22A981

IN THE SUPREME COURT OF THE UNITED STATES

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

V

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

Petitioner Meghan M. Kelly's Supplemental Brief to provide additional information not previously available on how private partnerships with the UN is schemed to be used to eliminate judicial authority in open and by stealth, Petitioner's belief the courts are in danger especially with the debt ceiling approaching November 17, 2023 with no agreement to date, and the convening of Congress October 19, 2023 to attack Justice Thomas and the integrity of the court by subpoenaing witnesses to be used against Justice Thomas and the Court

November 6, 2023

Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
Pro Se, not represented by
counsel
meghankellyesq@yahoo.com
(302)493-6693
US Supreme Court No 283696

QUESTION PRESENTED

1. If this US Supreme Court determines the DE State Court may not violate the Constitution by chilling the Constitutional check upon itself by vindictively punishing me for petitioning to correct, not destroy the court to preserve Constitutional rights and claims based on the perceived Court agents' religious-political poverty animus, while covering up its own misconduct by eliminating proof of my existence as a lawyer and falsifying the facts **per the new additional information arising or discovered after I filed the petition for rehearing**, is the basis for the PA reciprocal Order eliminated, must this Court must overturn the PA Order placing my license on inactive disabled. (emphasis intended)

2. Considering the new and additional facts arising or pieced together after the date of filing the petition for a rehearing, whether the US Supreme Court may only be disciplined or checked within the purview of the Constitutional limits of 1. a case and Controversy under Art. III, and 2. by impeachment, without waiver

a. to preserve my right and other claimants right under the 5th Amendment Equal protections component and procedural Due Process component to an impartial forum not partial towards an ethics code or towards regulations to maintain justices' seats but partial towards upholding the Constitutional rule of law as applied to cases,

b. Without waiver of individual justices' 5th Amendment right against self-incrimination so as not to be set up to eliminate judges schemed to fall by people who will lie to win, (especially Justice Kavanaugh who had 83 complaints against him made public in the 10th Circuit);

c. And, relating to activity that will punish judges ex post facto since all lawyer and judge disciplinary rules have no statute of limitations in any state or federal

court in this nation that I am aware of. So, there will be Equal Protections argument to apply similar rules in an equal manner against this court to discipline the Court,

d. And other Constitutional arguments I seek to preserve the right to be heard on in the Delaware District Court more thoroughly which are too numerous to include herein, and

3. Whether this Court must not violate the Constitution by impeding and chilling the checks upon its own branch, and its own justices via punishing me in terms of Alito denying my petitions for more time thrice in this case and twice in the civil rights case by denying a stay and denying 30 additional days for time, **or** by punishing me by placing a check on the Delaware Supreme Court for its willful violations of my Constitutional rights and other rights in judge's personal capacity by

a. Petitioning the Court for its agents' violations of my 1st Amendment rights to petition, religious belief, exercise of belief, speech, and association applicable to the state via the 14th Amendment, Equal protections and Due process via the 14th and 5th Amendments and other claims, including claims outlined in part in A-5 and A-5 attached hereto and

b. placing my license on inactive disabled but for the exercise of my rights outlined in 1. See also Article 1 Section 9 and Article 1 Section 10.

4. If this Court grants this petition to supplement the Court with information I was not previously able to provide due to insufficient time to outline all issues, given I asserted my fair right to be heard fairly and fully in an application for more time needed to Justice Alito in this case and I apprised the Court that his denial of my good faith effort deprived me of the opportunity to plead additional Constitutional defects in the underlying Delaware disciplinary

order the PA is based and unconstitutional defects in the PA proceeding, albeit the time and page limitations does not allow me to assert all claims still.

5. Whether the PA Supreme Court deprived me of my 1st 5th and 13th Amendment rights by refusing to docket items and to be heard on others, by incorporating those documents herein by attachment of the affidavits that discuss the same via reference.

6. Whether the Delaware Disciplinary procedure was so lacking in notice or opportunity to be heard before the Delaware original disciplinary proceeding as to constitute a deprivation of due process in the Delaware forum that the reciprocal order by the Supreme court must be voided because it deprives me of the 1st, 5th and 6th amendment rights of criminal like punishment without affording me the asserted not waived right to cross examine my accusers and present my case. There was such an infirmity of proof in the Delaware forum as to give rise to the clear conviction that the Pennsylvania court could not, consistent with its duty, accept as final the conclusion by the Delaware state court to reciprocate by placing my license on inactive discipline as outlined herein.

7. Should this Court grant my request for a supplemental brief under Rule 18.10 and Rule 25.6 because intervening circumstances of a substantial or controlling effect have arisen relating to the arguments in the petition at Question IX, pages 6-14, wherein I argued this court must limit discipline of the US Supreme Court justices to the purview of the Constitution to 1) cases and controversies, 2) and impeachment, without waiver of the 5th Amendment right to self-incrimination in order not to violate my fundamental 1st Amendment right to petition to defend my religious beliefs as a party of one based on retaliation for correcting judicial mistakes or misconduct including:

1. additional information not previously available on how private partnerships with the UN is schemed to be used to eliminate judicial authority in open and by stealth,
2. Petitioner's belief the courts are in danger especially with the debt ceiling approaching November 17, 2023 with no agreement to date, which Congress will use to pressure the weakened court to concede to congressional control regulations that infringe upon my opportunity to be heard on the same issue in an actual case ad controversy,
3. the convening of a Congressional committee the day after I filed the petition for a rehearing on October 19, 2023 to attack Justice Thomas and the integrity of the court to subpoena witnesses to be used against Justice Thomas and the Court, nit to impeach, but to garner societal peer pressure and other threats to control a no longer free and independent branch into becoming a puppet to whoever has the power to sanction them via regulations compromising the integrity of the courts to uphold the impartial application of the rule of law to preserve their positions and mere appearance not actual justice.
4. New bad faith and fraud by the DE Supreme Court to conceal its lawless conduct uncorrected within the purview of the Constitutional limit.
5. Whether Courts violate the Constitution by chilling and retaliating against people, me as a party of one, for seeking to limit judges' authority and correct misconduct and mistakes by the Court by motions in motions I drafted to preserve my Constitutional rights not destroy the courts especially my most cherished liberty to exercise religious belief in Jesus as God not money as God without Government persecution but for believing differently than the court. And if so whether the Pennsylvania order which

is based on punishment for my religious beliefs, contained in my speech, in exercise of my right to petition, but for the professional association of a lawyer is constitutionally permissible, or whether the underlying order is void, making the reciprocal order void. US Amend I XIV.

6. Whether courts in cases and controversies per Art III are sufficient to correct the misconduct or mistakes of lawyers they judge and discipline be the only Constitutional means to correct misconduct or mistakes by lawyers [and judges, albeit judges may be impeached too] instead of by professionals [even judges] who sit on boards who by nature of their positions are biased against freedom to serve what I believe is lawlessness in the eyes of God called sin, towards marketing professions and making money and covering up wrongs in their profession allowing injustice to fester and spread instead of allowing Court correction to shed light on how standardized conduct and dumbed down training may blind professional's eyes to see clearly how they harm the public, especially with the threats by Boards, especially historically medical boards should professionals care to think outside of the box because they value patients health more than their position , profit and personal pay, and seek to improve the care patients receive. I believe people go to hell for valuing money and material gain more than other people especially and specifically at work or by engagement of organized charity. Matthew 6:1-4. Jesus teaches people not saved from loss of eternal life have evil eyes, revealing evil dirty hearts. Matthew 12:34-38, Matthew 6 entire chapter. They look at people for what they may extract, what they may contribute driving out love from the person valuing them based on material gain extracted from them. Jesus teaches you cannot serve God and

Mammon, money and material gain. Matthew 6:24. I follow Jesus not the world. That said the way money is coined is the reason why the world is tempted to go the way to hell by sin and becoming the darkness and evil by blinding their eyes from caring about others by their desire in storing up moth and rust to care for their own. They lose their souls in hell for committing human sacrifice should they not be made clean of their dumbness and blindness by court correction or otherwise. I proposed a way to coin correctly without violating the 13th Amendment or my 1st Amendment religious belief in the district Court. If the US will fall in this crash, this court may catch them and preserve and strengthen the US. It is the courts who are my hope of a hero, but if the courts blind their eyes to violations of the Constitutional limits and requirements without careful thought on how to preserve the lives, liberty and health of those they serve without slavery and profiteering compliance by those who eliminate lives, liberty and health for profit, than the judges do not judge, they bow down to professionals and their products and services making men God misleading the world to harm and hell per scripture. Citing Romans 1:25 We need judges to judge even courageously enough to make mistakes sometimes and to humbly correct not let money and convenience be the judge which allows professions and charities to kill, steal and destroy human life, health and liberty as opposed to protecting it. I believe judges have the power to save lives and eternal lives even if this Court does not believe it. It need not believe it to make the world a better place by improving it by court correction to guide those misguided by the mark of the beast convenience, productivity and material gain for their selfish own that they disobey God and do not love others, they oppress, ignore or exploit them for material gain.

7. Whether this Court will create case law granting a means to prevent nonlawyers from lawyering and nonjudges from exceeding this courts 'power by judging by permitting Office of Disciplinary Counsel authority to bring cases in court not before boards to allow an open forum to safeguard the courts and the administration of justice or by some other means. I require the assistance of the brilliant minds of judges to think this out to prevent the very real agenda to eliminate the courts, even if this court should disagree with my positions. I require time.

LIST OF PARTIES

All parties appear in the caption of the case on the cover page.

CASES DIRECTLY RELATING TO THIS CASE

Kelly v Swartz, et al, Delaware District Court No. 21-1490, and Third Circuit Court of Appeals Matter No 21-3198. US Supreme Court filings Kelly v Swartz et al 22A747, Kelly v Swartz et al. 22-6783, Kelly v Swartz et al. 23A100.

Kelly v Trump Chancery Court No. 2020-0809, Delaware Supreme Court No. 119-2021, US Supreme Court No. 22-5522

Kelly v Democrats Delaware Chancery Court No 2020-0157.

The Original disciplinary case in Delaware Supreme Court matter No. 22-58 and IMO Meghan Kelly Number 541 regarding to appointment of counsel where I was denied copies or access to the filed pleadings. US Supreme Court application 22A476 Kelly v DE Office of Disciplinary Counsel.

Reciprocal disciplinary case Eastern District of PA matter No 22-45, Third Circuit Court of Appeals No. 22-3372.

Reciprocal Disciplinary case I believe is stayed Delaware District Court No. 22-341.

Reciprocal Case in the Third Circuit Court of Appeals 22-8037. Reciprocal disciplinary case before the US Supreme Court Kelly v Third Circuit Court of Appeals No. 22-6584 and application No. 22A478.

PA Supreme Court No 2913 DD3, US Supreme Court filing Kelly v Pennsylvania Office of Disciplinary Counsel US Supreme Court Numbers 22A981, 22-7695

DC and the US Supreme Court have refrained from discipline, DC based on jurisdiction.

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STATEMENT OF CASE

I, Meghan Kelly, Esq., pro se pursuant to Rule 18.10 and Rule 25.6 and any other rule respectfully moves this Court for leave to file this supplemental brief based on new information occurring or discovered after I filed the Petition for a rehearing and other information I was obstructed from including material to the issues on appeal before this court, and restricted to the new matters I order to safeguard my Constitutional liberties under the 1st, 5th, 13th and 14th Amendments.

1. Since I filed the petition for a rehearing intervening circumstances of a substantial or controlling effect have arisen relating to arguments in petition and whether the PA reciprocal Order, which is based on a defective DE Order is void or voidable due to clear violations of my Constitutional rights by the State of Delaware's Supreme Court and the Board.

.2. On 10/18/23, I filed *Petition for a rehearing on denial of writ of certiorari limited to intervening causes of substantial or controlling effect concerning my arguments which may vitiate my rights should the court not hear this rehearing.*

3. Two of the issues of this appeal and of the petition for a rehearing are

1. whether the US Supreme Court may only be disciplined or checked within the purview of the Constitutional limits of 1. a case and Controversy under Art. III, and 2. by impeachment, without waiver
 - a. to preserve my right and other claimants right under the 5th Amendment Equal protections component and procedural Due Process component to an impartial forum not partial towards an ethics code or towards regulations to maintain justices' seats but partial towards upholding the Constitutional rule of law as applied to cases,
 - b. Without waiver of individual justices' 5th Amendment right against self-incrimination so as not to be set up to eliminate judges schemed to fall by people who will lie to win, (especially Justice Kavanaugh who had 83 complaints against him made public in the 10th Circuit);
 - c. And, relating to activity that will punish judges ex post facto since all lawyer and judge disciplinary rules have no statute of limitations in any state or federal court in this nation that I am aware of. So, there will be

Equal Protections argument to apply similar rules in an equal manner against this court to discipline the Court,

- d. And other Constitutional arguments I seek to preserve the right to be heard on in the Delaware District Court more thoroughly which are too numerous to include herein, and
- 2. Whether this Court must not violate the Constitution by impeding and chilling the checks upon its own branch, and its own justices via punishing me in terms of Alito denying my petitions for more time thrice in this case and twice in the civil rights case by denying a stay and denying 30 additional days for time, or via punishing me by placing a check on the Delaware Supreme Court for its willful violations of my Constitutional rights and other rights in judge's personal capacity by
 - a. 1. Petitioning the Court for its agents' violations of my 1st Amendment rights to petition, religious belief, exercise of belief, speech, and association applicable to the state via the 14th Amendment, Equal protections and Due process via the 14th and 5th Amendments and other claims, including claims outlined in part in A-5 and A-5 attached hereto and
 - b. 2. placing my license on inactive disabled but for the exercise of my rights outlined in 1. See also Article 1 Section 9 and Article 1 Section 10.

4. This reciprocal case arises based on my petitions in Kelly v Trump to the Delaware Chancery Court and the Delaware Supreme Court to correct judicial misconduct or mistakes, and to safeguard my exercise of religious beliefs substantially burdened by President Trump by the establishment of government religion exhibited by a course of conduct including but not limited to the passage and enforcement of certain executive orders.

5. If this US Supreme Court determines the DE State Court may not violate the Constitution by chilling the Constitutional check upon itself by vindictively punishing me for petitioning to correct, not destroy the court to preserve Constitutional rights and claims based on the perceived Court agents' religious-political poverty animus than the basis for the PA reciprocal Order is eliminated. And this Court must overturn the PA Order placing my license on inactive disabled. Otherwise the Courts do not uphold the Constitution by favoring justices' personal interest in marketing their work and preserving their pay by preserving their government positions in violation of the Equal Protections Clause and the rule of law, especially in my case

where the State Court sealed the petitions to hide its misconduct on appeal to this court in Kelly v Trump, 21-5522.

6. Allowing the Constitutional check upon the Court in a case and controversy upholds justice and proves the Courts and justices are not above the law, but are bound to the Constitutional application of the rule of law without bias and favoritism to the personal interest of judges in marketing themselves and maintaining their personal pay in violation of the 5th Amendment Equal Protections component.

7. Since the Constitution applies to the Courts, Appellee and the DE State Court must not chill claimants, specifically me, for asserting my rights from infringement by the court to serve personal egos or material gain.

8. The deception that an ethics code or regulating US Supreme Court justices would uphold the Constitution by granting fair access will eliminate the Constitutional protections of claimants and allow for the elimination of the courts and permit the overthrow of the government down the line. These proposed ethic rules make the courts unfair since the rules focus is not on justice but preserving the deceptive fickle appearance of the courts and judges' positions for pay not freedoms which are not for sale, affording even judges limited Constitutional freedoms too. Judges merely may not violate the Constitution in asserting their individual liberties. Should judges violate the Constitutional restraints and checks built into the Constitution, the Court must not violate the Constitution further by removing the check created to protect me and the people in a case and controversy either by retaliation against me and creating attacks by outside court agents such as Court of Common Pleas Judge Kenneth S. Clark who threatened me in a grocery store but for not only my religious beliefs contained in my petitions but for my exercise of the First Amendment right to petition the court to correct

misconducts and mistakes or seeking an impartial forum to uphold the Constitution in the face of clear violations of the Constitution and the rule of law based on malicious intent of religious-political-and poverty animus.

9. This appeal also relates to Delaware's punishment of me disparately in contravention of the 1st Amendment for private speech outlined in my Religious Freedom Restoration Act petition petitions, where my religious belief is material to the issues therein, based on subject matter grounds of disagreeing with my religious belief. *Gentile v. State Bar of Nevada*, 501 U.S. 1030, 1054 (1991) ("At the very least, our cases recognize that disciplinary rules governing the legal profession cannot punish activity protected by the First Amendment, and that First Amendment protection survives even when the attorney violates a disciplinary rule he swore to obey when admitted to the practice of law")

10. New information arose or was discovered relating to the misconduct, fraud and bad faith of the Delaware Supreme Court justices acting in their personal capacity to abuse the color of the law to conceal and shield themselves from liability for violating the law.

11. I discovered the Court eliminated me from existence on the official publicized roll as if I am disbarred instead of placing me on inactive per the attached affidavit, and exhibits contained therein labeled 110th Affidavit. I filed the letter attached therein on 11/2/23 with minor corrections relating to the date of filing to the DE Supreme Court to correct the lawyer roll to show I am inactive not eliminated as unworthy of the bar.

12. I also newly discovered that my case was cited fraudulently and in bad faith cited in a case involving another Delaware Attorney Richard Abbott to commit a fraud upon me, the public and Attorney Abbott by creating precedent to misrepresent the fact that citation to rules the Court violated is evidence and precedent to conceal the state judges' liability for violating my

right to a fair proceeding. I incorporate by reference the 109th Affidavit, attached hereto. The state Court in bad faith fraudulently misrepresented the facts as evidence by the facts. The State Court violated my right to notice by affording insufficient notice in fewer days than the state rules required prejudicing me, ignored motions and did not docket them, than ruled I had no right to what was docketed in Matter 541 regarding appointment of counsel where I am the party. It is my religious belief that Jesus commands us to allow God through the holy spirit to be our advocate when we are brought wrongly to the courts but for our faith in Jesus. Citing, Luke 12:11. The Court did not allow me the asserted 1st and 6th Amendment to self-represent on the espoused religious grounds until late December 30, 2021, fewer than two weeks before the alleged hearing without ruling on my motions for discovery, objecting to notice and other matters at all until 2 days before the initial hearing date by email the hearing was on. I was so distraught about the appointment of counsel I got the shingles. The Court scheduled the hearing 8 days by postponement in my emergency motions and appeal to the DE State Court to deprive me of the more than 10 days required to adhere to the Del. Law. R. of Disciplinary Proc. Rule 12 (h) in subpoenaing witnesses to call my suspected accuser Arline Simmons. While the ODC violated the same rule by failing to provide material 10 days in advance pursuant to Rule 12(h) which prejudiced me of a fair proceeding in the rushed fixed proceeding against me. This Court in *Greene v. McElroy*, 360 U.S. 474, 475 (1959), held “this Court will not hold that a person may be deprived of the right to follow his chosen profession without full hearings where accusers may be confronted and cross-examined”. Thus, this Court must not deprive me of my PA license as neither the DE Court nor the PA Court afforded a full hearing where I could confront accusers and cross examine them in this criminal like proceeding. Thus, this Court must void the PA order.

13. The only notice I received concerning discipline was I was being disciplined for my religious beliefs which allegedly was illogical and did not make sense to the state. My protected exercise of religious belief in Jesus by keeping myself separate from the world by not sinning which is committing lawlessness in the eyes of God is my most important aim in my life. I reasonably was upset and became quite sick during the DE Board proceeding. Without haste, in response to the Board's 8 days I filed a motion to call Arline Simmons and Court of Common Pleas Judge Clark to the hearing. The Board never responded. I also filed a motion for reconsideration by the Board, and appealed the denial of my motions to suspend the hearing while continuing it for 8 days for a reason I did not state in my motion to suspend the proceeding to the DE Supreme Court. I demanded I be afforded time to adhere to the rules to call witnesses, collect discovery and prepare my defense. The 8 days did not waive my objection to the 20 day notice required by *Del. Law. R. of Disciplinary Proc.* Rule 9 (d)(3):either, of which I was deprived. The DE Supreme Court members Reeves, Vaughn and Traynor called my interlocutory appeal frivolous to cover up its lawless acts I was not aware of at the time of the trial Board proceeding 1. firing two court staff and 2. concealing evidence in my favor. I was compelled to attend a hearing ill, without sleep, opportunity to prepare and present my case in order not to violate another rule creating default judgment. I asserted and did not waive my right to a fair proceeding. I maintained objections at the DE Disciplinary hearing, but more violations arose. The Court reporter accused me falsely of reading documents, possibly to help herself look at them to draft the transcript. The Court reporter made up outrageous things I did not say. The entire transcript of the hearing was inaccurate and prejudicial. Reporter said she could not hear me. I objected to the transcript, and maintained my objections even after I noted some cursory changes. There were too numerous and the transcript was too faulty to correct.

14. Moreover DE ODC Vavala took over the case despite not attending the hearing, predictably because the other two ODC may be called as witnesses should this case be brought to court. Judge Traynor appeared to be aiding the court in preparing a case against me as I averred in the civil rights case. So, using the 2 ODC as witnesses against me in a potential proceeding is the plan.

15. I also realized more clearly now lawyers should not self-correct because lawyers' profit when laws harm the public or violate constitutional rights because that brings them business. We are the representation of the public in cases. Yet, we have conflict of interest in that we work for money, and clients' rights are not for sale. They become for sale when lawyers are blinded by their desire for money and their training that they do not see clearly how some laws and practices violate the rights of those they represent. This blindness and dumbness Jesus the Christ speaks of dumbed down by desire, standardized training, education or experience is what I believe is the mark of the beast by those not saved by their desires and death in hell by learning to repent by unhardening their heads and hearts to lay down their desires by doing what is right, not what is profitable, convenient or productive. Sacrificing the lives, liberty, and health of others for material gain even knowledge under the pretty word, science, expert, professional, public interest, or common good is the common bad when convenience and the selfish desire for profit eliminates rights the Constitution demands we protect and do not infringe. I desire judges judge without threat to their seats outside the purview of the Constitution's clear limits. I also assert even judges by allowed to make mistakes with the right that they be corrected. They are not held to perfection as God. Allowing mistakes without reprisal affords judges the unobstructive authority to courageously do what is right instead of allowing professionals, science and experts to be above court correction by favoritism to marketing and making money

while sacrificing the Constitutional rights and claims of those we serve. We cannot prevent cancer causing products if health boards and mere regulators defer to those who use science to market drugs and products that murder people for money. I oppose professional boards and regulators, even the FDA and prefer judges judge, not bow down to those who worship the mark of the beast and mislead the people to harm and hell. Matthew 6:24.

16. Attached please find a letter I incorporate herein that I never filed with the DE State Court. I outline my concerns that lawyers never prevent problems because we profit off of them. When we cause the problems, we should allow cases and controversy to correct them and improve the administration of justice, not conceal problems in professions in secret proceedings to market the appearance of helping the public while covering up evil allowing it to fester and spread. I not only oppose regulating to control the court. I oppose regulating to control the bar to prevent the bar from upholding the rights of claimants by disparate favoritism towards those who enrich the profession in pay and possessions.

17. Nevertheless, I urge the US Supreme Court to grant PA ODC the power to correct non-lawyers from lawyering and non-judges judging, or at least grant all ODC's the authority in case law in this case and controversy to prevent the eliminations of the courts to eliminate the government. The slow overthrow of the government will use entities to practice law with regards to manipulating the chain of title in deeds to recoup property to an entity and its partners through association who asserts immunity by written agreement by the other branches of government by executive orders and congressional authorization of monies, the UN.

18. As a Delaware Attorney whose first job was drafting sneaky entities called bankruptcy remote entities which conceal assets and bad debt, I am cognizant that the law will be used to kill itself by hanging. I worked at the biggest home grown corporation in the corporate

capital of the world RLF in Delaware. We need impartial judges please to judge us and save us not boards.

19. On that related matter, as of 11/5/23 Congress has not passed a budget. 11/17/23 is the deadline. There is a high likelihood of default without pay to the courts during the holiday season. Congress previously threatened to weaken the courts and their staff by not paying the courts should a budget not pass, while violating the 5th Amendment Equal Protections Clause by paying the other two branches of government. This creates a clear and present danger by eliminating the courts check on the other two branches and allowing two branches to be above the law and the Constitution. Should this ripen or this Court consider this issue in the face of immediate threat to its own branch. I incorporate affidavits and papers attached hereto and incorporated herein regarding safeguarding the courts in the face of this threat. I face irreparable injury in terms of a weakened court who may reject my right to petition on issues to allow Congress to extort and bribe them with pay of the withheld sums to regulate a no longer impartial independent court by regulations I strongly oppose. See 93rd and 86th Affidavits where I aver payment to the judicial branch must be paid.

20. Since filing the petition for rehearing on 10/18/23, I discovered connections and information that was either not available or I was not aware of until after the filing of my last document in this open case that are material to this appeal. On 10/19/23, Congress announced its intent to take action in a committee to subpoena witnesses to attack Justice Thomas and this Court by compelling regulations that will endanger this Court and the impartiality it requires to uphold and not violate the parties it serves in discerning the rule of law in each case. Since that date, per the attached article I incorporate herein, Congress has taken concrete steps towards attacking the integrity of this US Supreme Court and its justices without a case or controversy or

impeachment to pressure the court to become partial towards those who misuse ethics code or regulations to force their will and fix their cases by eliminating judges by threats or stealth. I strongly oppose the personal attacks against judges and those who may be subpoenaed. Arguably every case this Supreme Court decides affects each of us personally and individually with benefits and detriments with each new opinion. Does that mean there is a conflict of interest depriving claimants of a fair proceeding under the 5th. Does that mean justices should live in a box and not associate with loved ones, friends, or the public it serves. Thus, must we imprison the ones who are charged with safeguarding our freedom in our Democratic Republic. I think not. It is sufficient that claimants may assert violations of their right to a case or controversy in an actual proceeding without additional threats of sanctions by a disciplinary code to preserve justice and the courts by improvement not destruction.

21. Congress's improper attacks against Justice Thomas and the integrity of the court by subpoenaing witnesses to be used against Justice Thomas and the Court places the rule of law in danger by reign like mobsters by Congressional and also Executive threats to justices to serve the lobbyists (not the people) to serve themselves and their seats. Congress and the President make a mockery of the profession. I chose to serve God as an exercise of my religious belief by upholding by requiring impartiality in the courts, not the lawless vanity of men in high ranking positions of power like misguided congress people. Matthew 23:23, Amos 5:15, US Amend. I

22. The Courts are in danger of having no effect in a scheme to eliminate it. Attached please find a bunch of documents I filed in the DE District Court which allude to how the overthrow of our government will occur if the Courts do not stop it. Please see the attached laws showing the UN is immune from lawsuits, and immune of losing real or personal property with allodial title, not bound by the Constitution or taxes.

23. Please see the attached agreements of private-UN partnerships where entities will act as agents of the UN and not be bound by our criminal or civil laws in the recoupment of properties including the property Trump has an ownership Black Rock and other documents I incorporate herein by reference to their attachment, or the first Document of its packet as attached uploaded and printed out for submission.

24. New and increasing threats of dangers have arisen since 10/18/23. Biden violated the Wars power act by retaliating against Iran without Congressional approval. I drafted two attached affidavits on my belief the courts may prevent a world war, I incorporate herein. The billions of additional dollars the other two branches grant to fund war threatens the payment of the federal courts with the looming November 17, 2023 budget deadline. It is likely a default will hit, and pressure the courts to regulate. See, 93rd and 86th Affidavit.

25. Relating to Justice Alito's denial of an application for time so as not to deprive me of the fair opportunity to exercise the first amendment right to petition fairly pursuant to the 5th the PA order in issue in this case I present new matters for Court consideration I was deprived of asserting previously in the petition of writ of certiorari.

26. In my writ of certiorari in this case I entitled an argument outlined in pages 6-12

“ii. Justice Alito unreasonably denied my application for more time which prejudices me due to inability to work based on this petition (wherein I waive claims by government compelled forced time limits without accommodations and am compelled to present subpar pleadings) based on my disagreement with his decisions and the decisions of the Court which I outlined in exhibits to my petition in violation of the Equal Protections Clause based on disdain towards my genuinely held religious belief”

27. I asserted and preserved my claims of denial of rights in the petition for writ of certiorari, and seek to correct them herein not destroy Justice Alito.

28. I request the Court consider the new information I presented regarding the defects in the Delaware Disciplinary case and I argue as follows: The Delaware Disciplinary procedure

was so lacking in notice or opportunity to be heard before the Delaware original disciplinary proceeding as to constitute a deprivation of due process in the Delaware forum that the reciprocal order by the Supreme court must be voided because it deprives me of the 1st, 5th and 6th amendment rights of criminal like punishment without affording me the asserted not waived right to cross examine my accusers and present my case. There was such an infirmity of proof in the Delaware forum as to give rise to the clear conviction that the Pennsylvania court could not, consistent with its duty, accept as final the conclusion by the Delaware state court to reciprocate by placing my license on inactive discipline as outlined herein.

29. PA Supreme Court refused to even file or docket for consideration a number motions I discuss and attach hereto in two affidavits, the 5th and 7th Affidavits I and incorporate herein, and whether PA's denial of my asserted ADA claims relating to physical limitations where I require time not only for a fair proceeding but sought a religious objection where I assert my right to preserve my life and health as a religious exercise and asserted religious objections to professional examination and treatment. I believe more people go to hell and harm others by blindly adhering to the science, experts and professionals in the medical profession than many other professions. I have sincere not fake, but genuine religious objections to making man and man's work by making science guide, master and God to preserve both my life and eternal life. I encourage studying and examining issues, but I sincerely believe people are misled into ignorantly harming others on their own way to hell for even teaching people to trust the experts, the doctors and the science who may harm them to serve material gain even knowledge. This makes fallible imperfect man and his work God and reflects the image of the evil one outlined in Isaiah 14, where he sought to be his own God.

30. The devil teaches getting it wrong is okay so long as you learned and did not know. My God teaches many are damned to hell the last day for getting it wrong and for not knowing, not caring to know in order to love one, even those outside of your own another not commit human sacrifice of life, liberty and health to serve your own at the expense of violating the Constitutional rights of others. Slavery should not be permitted by non-government entities and the human sacrifice by selling products that kill, or produce them in a manner that slowly poisons people to death should be corrected not ignored. Because I believe people go to hell for blindly doing what they are trained to do, their job requires, or their narrow experience requires without thinking things out to care to love others they harm, I believe Court correction may save lives of innocent victims and the souls of dumb and blind wring doers.

31. I seek to preserve the Courts not destroy them when I petition to correct judges within them to preserve my rights and the rights of others to buy and sell which should not be eliminated but for their religious belief in Jesus as God, not money as God or for some other Constitutionally asserted right as in the Delaware attorney Richard Abbott's case.

Wherefore I pray this Court considers this supplemental brief, and grants the relief I plead herein.

Respectfully submitted,

Dated 11/6/23

/s/Meghan Kelly

Meghan Kelly, Esquire
DE Bar Number 4968
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
US Bar Number 283696

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

Dated: Nov. 6, 2023

Meghan Kelly (printed)

Meghan Kelly (signed)

L I F P
No. 22-7695

Related Application No. 22A981

IN THE SUPREME COURT OF THE UNITED STATES

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

v

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

Petitioner Meghan Kelly's Petition for a rehearing on the 11/13/23 order denying petition for a rehearing submitted 10/18/23, denied on 11/13/23 to consider intervening causes of substantial or controlling effect concerning my arguments and other claims not previously considered which will vitiate my rights should the court not hear this rehearing

12/7/2023

/s/Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
Pro Se
meghankellyesq@yahoo.com
(302) 278-2975
US Supreme Court No 283696

QUESTION PRESENTED

I. Whether the Court should limit the purview federal judges, specifically the US Supreme Court justices may only be corrected within the purview of the Constitutional limits of cases and controversy and impeachment in order not to vitiate my right as applied to an impartial fair forum to petition to safeguard not merely my license but my fundamental right to religious belief, speech, association, exercise or belief and other claims but for petitioning the courts to alleviate a substantial government burden upon my religious belief, regarding bar dues, and to correct court misconduct or mistakes, given the great imminent threat to the court arising **November 13, 2023** of its own foolish passing of an Ethics Code and Congressional subpoenas authorized **November 30, 2023** to incriminate Justice Thomas and the court to control and corrupt the court under the guise of cleaning it to ultimately set up a foundation to eliminate it, to eliminate the rule of law and the governments which restrain collective peoples who associate within entities who have no power to do any good by their conditional collective group purpose to unconditionally love unrestrained by the love or the just rule of law from oppressing, stealing, killing and destroying human life, health or liberty to gain the world to lose their souls in the second death hell if the courts through the rule of law do not reverse and stop it.

II. Whether regulating the US Supreme Court, Appellate Courts and District Court judges through Judicial disciplinary proceedings, or an ethics code, including the November 13, 2023 Ethics Code violate Americans and my asserted right to an impartial forum to petition for relief because the courts will be biased towards the regulators even self-regulators instead of the impartial application of the Constitution to the rule of law.

III. Whether the adoption of a Code of Ethics and the threats to and actual vote authorized to issue subpoenas to Crow and Leo to incriminate Justice Thomas in particular and

the Court in general to pressure it to regulate it, to eliminate it down the line poses a danger to the rule of law that binds our diverse peoples together with respect for one another's freedom to individual diverse exercise of rights, allowing for the overthrow schemed after 2050 by intentional-schemed design.

IV. Whether it is preferable for judges to judge in a case or controversy to impartially not partially consider whether its members or state court sister judges violated the Constitutional asserted rights of the parties to uphold the rule of law and improve the administration of justice, not to destroy the courts while maintaining the authority of the court's power rests on, jurisdiction in a case or controversy to render the impartial rule of law, as opposed bureaucrats, self-regulation, even by professional or judicial partial boards unrestrained by laws in a case or controversy where temptations of partial selfish whims and favoritism to self under the marketing the image of justice becomes more important as opposed to actually seeking to uphold the impartial rule of law to the point it snowballs in the cover up injustices transforming it into many more injustices like the DE case where the court fired court staff, sealed pleadings incited attacks against me to cause me to forgo my right to petition in *Kelly v Trump* because the court cared about its image not truth or the rule of law and the procedural due process violations so great as to void the proceeding

V. Whether the case manager committed a clerical error in not docketing a petition to exempt additional copies of documents despite the fact this US Supreme Court noted it had authority to entertain such motions in *Snider v. All State Administrators*, 414 U.S. 685 (1974), and whether this may be cured by docketing future same motion for the justices of the court to deny or allow.

VI. Whether the Courts staff committed clerical errors that may be cured by neither accepting or rejecting Supplemental Brief submitted in good faith attached hereto without exhibits filed to and necessary to be considered simultaneously with the First Petition for rehearing in deprivation of my 1st, 5th and 6th Amendment fair open access to the courts by not even docketing it or rejecting it with a letter of deficiency with opportunity to correct it pursuant to its custom based on disparate denial in violation of the Equal protections component based on view point and partiality to the courts and not the asserted not waived application of the Constitution to the rule of law. Whether this Court must cure the defect by considering the attached to safeguard not only my rights, but its own position and the rule of law that United States under the imminent threat of an intentional plan to overthrow it sometime after 2050, where the conditions that force the overthrow are made now.

VII. Whether this Court's staff committed a clerical error that may be cured by this courts petition now when it deprived me of access to the courts in deprivation of the 1st Amendment when it refused to docket *Application Emergency Application to reopen 22-7695 to consider Supplemental Brief filed 11/6/23 in order not to deprive me of 1st Amend right to petition fully & fairly in accordance w/5th Amend before eliminating 1st Amend rights to religious beliefs & license. I also desired clarification on why the submission on Petitioner Meghan M. Kelly's Supplemental Brief to provide additional information not previously available on how private partnerships with the UN is schemed to be used to eliminate judicial authority in open and by stealth, Petitioner's belief the courts are in danger especially with the debt ceiling approaching November 17, 2023 with no agreement to date, and the convening of Congress October 19, 2023 to attack Justice Thomas and the integrity of the court by subpoenaing witnesses to be used against Justice Thomas and the Court.*

VIII. Whether the court erred in depriving me access to the courts by delay in docketing cases especially in the civil rights case Kelly v Swartz, 21-3198 by failing to docket a petition for rehearing to Justice Jackson dated March 13, 2023 until about March 28, 2023, about 15 days later in Matter which deprived me of access to this Court to overturn the original disability order this reciprocal order is based, depriving me of an impartial forum to overturn the Order rendering collateral attacks in this case necessary for consideration not deference without deprivation to my access to the courts based on viewpoint of speech with courts rendering partiality to itself instead of the impartial application to the rule of law in my case as applied.

XIV. Whether the court's staff's legal error in making a judicial as opposed to clerical decision by not docketing the application to reopen the case must be cured by considering this petition presented in good faith.

XV Whether PA Clerk committed grave injustice by not docketing my pleadings including a pleading which deprived me of not only access to the courts but deprivation of the fundamental rights for which my license is restrained which may be cured by vacating the PA reciprocal disability inactive order to place the license on retired

LIST OF PARTIES

All parties appear in the caption of the case on the cover page.

CASES DIRECTLY RELATING TO THIS CASE

Kelly v Swartz, et al, Delaware District Court No. 21-1490, and Third Circuit Court of Appeals Matter No 21-3198. US Supreme Court filings Kelly v Swartz et al 22A747, Kelly v Swartz et al. 22-6783, Kelly v Swartz et al. 23A100.

Kelly v Trump Chancery Court No. 2020-0809, Delaware Supreme Court No. 119-2021, US Supreme Court No. 22-5522

Kelly v Democrats Delaware Chancery Court No 2020-0157.

The Original disciplinary case in Delaware Supreme Court matter No. 22-58 and IMO Meghan Kelly Number 541 regarding to appointment of counsel where I was denied copies or access to the filed pleadings. US Supreme Court application 22A476 Kelly v DE Office of Disciplinary Counsel.

Reciprocal disciplinary case Eastern District of PA matter No 22-45, Third Circuit Court of Appeals No. 22-3372.

Reciprocal Disciplinary case I believe is stayed Delaware District Court No. 22-341.

Reciprocal Case in the Third Circuit Court of Appeals 22-8037. Reciprocal disciplinary case before the US Supreme Court Kelly v Third Circuit Court of Appeals No. 22-6584 and application No. 22A478.

PA Supreme Court No 2913 DD3, US Supreme Court filing Kelly v Pennsylvania Office of Disciplinary Counsel US Supreme Court Numbers 22A981, 22-7695

DC and the US Supreme Court have refrained from discipline, DC based on jurisdiction.

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APPENDIX

5th Affidavit, filed 12/27/22, dated 12/20/22, regarding PA Supreme Court Clerk Nicole Traini refused to docket Motions, with exhibits thereto including

- Exhibit 1, *Respondent Meghan M Kelly's Second Motion for a stay due to circumstances increasing prejudice and harm, new facts arising necessary to my defense of reciprocal order, and additional questions that require answers in order to defend myself in response to the reciprocal order in the alternative a continuance of 6 months*, December 19, 2022
- Exhibit 2 Motion to correct an error of material fact which regarding discovery of sealed pleadings and efforts to confirm and correct it, regarding threats to the courts and why they are special and not replaceable by automation dated 12/18/22

7th Affidavit, filed dated December 22, 2022 regarding PA state court's unfair proceedings and refusal to docket computer issues, and other impediments requiring an accommodation by the PA State Court including severe dehydration in risk to health and life wherein I asserted my religious exercise to live and opposition to healthcare as that is what made me forever weak. And exhibits thereto

- Exhibit 1 December 28, 2022 letter to regarding PA State court proceeding and the Clerk's failure to docket my pleadings
- Exhibit 2 Respondent Meghan M. Kelly's Motion pursuant to Pa. R.A.P. 105 for permission to file unconforming documents and to compel the acceptance of rejected documents upon the date of their submission, with allowance for opposing counsel to respond,
- Exhibit 3 Respondent Meghan M. Kelly's Motion to compel the acceptance of a specific Motion, not previously identified in my Motion to accept undocketed pleadings
- Exhibit Petitioner Meghan Kelly's Motion to exempt costs or expenses to Pennsylvania Disciplinary Counsel and/or to the Board if applicable due to utter poverty, and due to foreseeable costs creating a substantial burden upon Petitioner's access to the courts and forced violation of her religious beliefs by threat of indebtedness and additional relief
- Certificate of service to 5 Five, PA Office of Disciplinary counsel or staff against me
- Exhibit 4 email grievance committee
- Cert of service for affidavit.....11

18th Affidavit regarding delay in docketing interim application for a stay to Justice Jackson until about 15 days later which deprived me of access to the courts for other matters including the appeal of the original DE Disciplinary Order for which this reciprocating order is based, and exhibits thereto

- Exhibit A Emergency application to Justice Jackson on March 13, 2023
- Exhibit B After about a week with no confirmation from the court of receipt of the March 13, 2023 filing which should have been received on March 16, 2023, I sent out the

second request for the Emergency Application to be resubmitted to Justice Jackson on March 21, 2023, which was physically received March 23, 2023, yet not recognized yet

- Exhibit C The postal tracking receipt Confirms second attempt to file without delay showing delivery information
- Exhibit D Court docket showing as of March 28, 2023 the applications submitted March 13 and March 21 were not docketed 15 days later as of March 28, 2023
- Exhibit E Emails to the court to alleviate prejudice by expediting review of the delayed docketing in order not to vitiate my access to other courts
- Exhibit F emails concerning the Clerk’s office staff noting there was a glitch in the system, and emails concerning the importance of the Third Circuit appeal the US Supreme Court denied
- Exhibit G After emailing and leaving messages it looks like the Court filed the March 13 application to Justice Jackson today, and rejected the March 21, 2023 as of March 28, 2023.
- Exhibit H emails to David Weiss.....10

19th Affidavit regarding delay in docketing by the US Supreme Court again, wherein I state “On Monday, March 27, 2023, the Supreme Court received a different emergency application from me. Today is March 31, 2023. The Court has been in physical possession of the paper copies of that emergency application for about 5 entire days, but it is not even noted as docketed or rejected at this time. See the attached for a copy of this email, and the exhibits thereto. Delays in docketing pleadings prejudice me by rendering me without time to know whether I should file a petition. If the Court denies a stay and an interim stay within the next few days, it forecloses my right to Petition in the Delaware case...” and exhibits thereto,

- Exhibit A Emails delay in docketing and the irreparable injury I face at delays
- Exhibit 1 Proof submission 3/21/23, second application to justice Jackson disparately deleted
- Exhibit 2 Different electronic proof of electronic submission rejected from filing but not deleted
- Exhibit B Letter dated July 21, 2021 in *Kelly v Trump* where I expressed concerns to the Delaware Supreme Court concerning the elimination of fiat currency in the letter
- Exhibit C Fed Now Central bank eliminating small banks and the human component down the line
- Press Release by Federal reserve dated March 15, 2023 indicating FedNow would be unleashed April 2023
- BlackRock Delaware entity information
- Artesian and other water sources information
- Wireless entity information stocks
- Exhibit E letter indiacting March 28 2023 application to Justice Jackson were removed and returned from the docket for case Numbers 22A747 and 22-6783

- Appellant Plaintiff Meghan Kelly’s Application to the Honorable Justice Alito to place exhibits back on the Docket to prevent the deprivation of her 5th Amendment Equal Protections and procedural due process right to a full and fair opportunity to be heard without selective, arbitrary, disparate, unfavorable treatment towards her as applied, and to preserve her 6th Amendment right, No. 22-6783, No 22A 747
- March 28, 2023 letter returning second letter, with note March 13 letter not docketed until March 28, delays deprived me of access to other courts as I alleged, irreparable injury occurred and worsens.....10

26th Affidavit regarding relief by US Supreme Court would be too late to grant me protection and access to its courts in other cases

- Exhibit A, Third Circuit update by letter dated April 18, 2023 per their order requesting updates
- Exhibit B Docket No 22A747 and 22-6783conference was moved but still too late
- Exhibit C April 17, 2023 letter by US Supreme Court
- Application to withdraw petition before judgment and application since relief is too late opportunity to exercise asserted right to access to other courts already vitiated with the 3rd Circuit expedition and pending due dates an impossibility for me
- Exhibit D Feb 7, 2023 Letter, writ of cert postmarked Jan 30, 2023 and received Feb 2, 2023 returned because I filed the petition for more pages first and not with the petition which broke my heart
- Exhibit E PA Retirement dated 5/16/18
- Exhibit F Eastern District Court for the District of PA proof showing I thought I was retired and noted it in its pleadings
- Exhibit G Order setting me up indicating retirement in PA makes me retired in Eastern District Court which is untrue, Court setting me up knowing the law and the fact I did not have easy access to it especially since I turned in my tags as car insurance was unaffordable at te time along with gas
- Exhibit H letter confirming I was not disciplined by its court, email confirming I was not disciplined
- Exhibit I Letter Oct 10, 2022 letter status of motions and advising the court of my needs to sustain my life and health and my assertion of my religious right to live not to harm my health of life for the wicked vanity, convenience and material gain of those who commit human sacrifice for moth and rust, the mark of the beast, noting collapsing at the post office and being rescued by a stranger with water from my bike
- Exhibit A email my transportation bike got a flat
- Exhibit B email to opposing counsel and pictures of the bike
- Exhibit C Sept 3, 2022 Letter to where PA ODC Anthony Sodroski requesting a stay to prevent irreparable injury.
- Exhibit D PA ODC response by Anthony Sodroksi unreasonably opposing my request for a stay

- Exhibit E proof and assertion of my belief people will be thrown into the fires of hell for not respecting my assertions of health and life and my religious objection to healthcare and mental healthcare, and proposal of improving are terrible healthcare, transcripts, bad treatment record that weakened me for life
- Exhibit F Police showing someone tried to shoot and kill my friend and his wife by two bullets entering their home as they sat at the table and they went over their head for their political beliefs, this is not normal
- Picture someone threw substance at my car for my political religious speech contained on the stickers on my car
- Proof submission to Eastern District Court
- Opinion by Third Circuit, delay in docketing made it too late for me to petition DE order. I needed time given my meager resources, and use of those resources for one thing at a time.
- Exhibit K eye injury I was scared I might go blind, in the petition for more time Alito denied it despite injury to my health.
- Exhibit L E-mail
- Cert of Service.....10
- **126th Affidavit** regarding belief of an overthrow which will use bankruptcy remote entities, concern about the Spicer case, and the PA judges who imprisoned black children for profit in PA.....2
- **127th affidavit** concern of deprivation of access to the US Supreme Court and notation of another case where documents were denied due to delays in docketing.....2

PDF labeled Emergency filing meg Multiple exhibits in electronic format only wherein Meg does not attach all exhibits contained therein

- Letter To Donald Baker dated December 4, 2023
- News Article posted in Desert News, *Senate Judiciary Committee issues subpoenas to private citizens connected to Clarence Thomas*, By Eva Terry, dated Thu, November 30, 2023 at 8:28 PM EST
- Exhibit 1 Certificate of Receipt of December 1, 2023 filing of Second Petition for a rehearing, postal tracking, pictures of boxes dropped off, US Police receipt
- *PETITIONER MEGHAN KELLY' SECOND PETITION FOR A REHEARING ON DENIAL OF A WRIT OF CERTIORI LIMITED TO INTERVENING CAUSES OF SUBSTANTIAL OR CONTROLLING EFFECT CONCERNING MY ARGUMENTS AND OTHER CLAIMS NOT PREVIOUSLY CONSIDERED WHICH MAY VITIATE MY RIGHTS SHOULD THE COURT NOT HEAR THIS REHEARING*, dated Nov. 30, 2023
- 124th Affidavit, dated 11/24//23, wherein I discuss denials of other documents which appeared in deprivation of my 1st Amendment right to access to the courts by PA Supreme Court and the United States Supreme Court including the attached motion at
- Exhibit B, *Petitioner Meghan M. Kelly's Motion for an exemption from the requirement to serve 10 paper copies of pleadings with this Court pursuant to Rule 12(2), 29(1), and 39(2), by the filing of one paper copy, and in addition to, or in the alternative of, permission to serve the United States Supreme Court electronically without a paper copy for future filings, due to costs relating to printing, mailing and transporting pleadings to*

the Post Office, creating a substantial burden upon my access to the Court's to defend my exercise of fundamental rights, and forced violation of religious beliefs by the threat of indebtedness

- Letter denying motion despite case indicating the court has jurisdiction to grant the relief, Snider v. All State Administrators, 414 U.S. 685 (1974), albeit it denied it under the facts of that case.
- Petitioner Meghan M. Kelly's Supplemental Brief to provide additional information not previously available on how private partnerships with the UN is schemed to be used to eliminate judicial authority in open and by stealth, Petitioner's belief the courts are in danger especially with the debt ceiling approaching November 17, 2023 with no agreement to date, and the convening of Congress October 19, 2023 to attack Justice Thomas and the integrity of the court by subpoenaing witnesses to be used against Justice Thomas and the Court, submitted Nov. 6, 2023.....3, 4, 6, 7, 9

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STATEMENT OF CASE

I, Meghan Kelly, Esq., pro se pursuant to Rule 44 respectfully move this Court for a rehearing on the **November 13th Order** denying petition for rehearing on this court's order denying my petition of writ of certiorari, **submitted October 18, 2023** to consider intervening circumstances of a substantial or controlling effect concerning my arguments and other claims not previously considered **which have arisen since I submitted the First Petition for Rehearing dated 10/18/23 to** overturn the PA Supreme Court Order reciprocating DE discipline by placing my license to practice law on inactive disabled but for my petitions relating to bar dues and in a Religious Freedom Restoration law suit *Kelly v Trump*. (See US Supreme Court Case No. 21-5522)

I submit this petition timely within the 25 days of the decision I seek a rehearing on the 11/13/23 decision **denying the first petition for rehearing** in accordance with the time frame of Rule 44.2 to include intervening causes of substantial or controlling effect concerning my arguments and other claims not previously considered which will vitiate my rights should the court not hear this rehearing since the date of the first Petition of rehearing was submitted 10/18/23. The deadline is 12/8/23.

This Court has accepted subsequent petitions for petitions rehearing. For example in *United States v. Ohio Power Co.*, 353 U.S. 98 (1957) this Court considered 3 petitions for rehearing by claimant, denied all three, then vacated its order a year later, and granted rehearing and certiorari *sua sponte*.

With that important doctrine this US Supreme Court may reopen any of my petitions *sua sponte* to address the issues that endanger courts by third party and self-regulation by limiting discipline of judges to the purview of what this court says is law in an actual case that binds

congress and the president within their limits. See, Chicago Kent Law review, *Rehearing SUA Sponte in the U.S. Supreme Court: A Procedure for Judicial Policymaking*, by Rosemary Krimbel, dated October 1989.

On 11/13/23 to my horror this Court passed an ethics code. Some members of Congress seek to use a code or regulations to control the courts. I oppose regulating the US Supreme Court, District Courts and Appellate Courts. The only manner to correct judges is within the purview of the Constitutional limits including in cases or controversies such as this one as I am doing now or impeachment. Regulating the Court, even by self-regulation violates my 5th Amendment right to an impartial forum as applied by creating a forum that is partial towards its appearance before regulators, even itself, instead of the impartial application of the Constitution to the rule of law.

The rule of law, not money or might is the glue that holds this nation together no matter how richly fragmented. I believe requiring the courts do what is right by upholding the impartial rule of law as applied to itself will safeguard the judiciary and these United States from a very real-intentional-unnatural-schemed overthrow.

When I ran for office in 2018 I discovered a scheme to eliminate people lawyers and people judges to eliminate the rule of law that restrains individuals in collective entities from enslaving, killing, stealing and destroying human life, health or liberty for material gain under the lie of Lucifer the common good or public good. I believe the bankruptcy remote entities will be used to maintain debt slavery in a Ponzi scheme of reselling what does not exist to maintain slavery debt first by carbon credit control and later by utter control of every person and everything with no government to restrain entities with the just rule of law. (126th and 127th attached affidavits)

To my horror after I drafted the Second Petition for a rehearing dated 11/30/23, for reconsidering of the 11/13/23 Order submitted 12/1/23 and attached hereto for a rehearing on matters subsequent to October 18, 2023, the Senate authorized subpoenas to Leonard Leo and Harlan Crow, per the attached newspaper article. I believe Leonard Leo and Harlan Crow are being set up to fall or to make the court fall, through incriminating individual judges. I am concerned they may be criminally prosecuted or sued under the bribery statute 18 USC 201, even if they did nothing wrong. Regardless they will be incriminated by social attacks incited by the whims of congressmen to garner support for their election seats by making a horse and pony show out of incriminating the justices of the US Supreme Court. I believe they must invoke the 5th to protect not only themselves from a set up, but the courts and the rule of law too. The goal of the testimony is to incriminate them and the court.

This new information relates to two issues I asserted the Court rejected consideration on 11/13/23: where I argue this Court hold here and now that 1) the US Supreme Court may only be disciplined or checked within the purview of the Constitutional limits of 1. a case and Controversy under Art. III, and 2. by impeachment, without waiver to preserve my right and other claimants right under the 5th Amendment Equal protections component and procedural Due Process component to an impartial forum not partial towards an ethics code or towards regulations to maintain justices' seats but partial towards upholding the Constitutional rule of law as applied to cases, and 2) the Courts may not violate the Constitution by impeding and chilling the checks upon its own branch, and its own justices via punishing me in terms of petitioning the courts to uphold and not violate the Constitutional law based on viewpoint of speech, and partiality to courts at the bias against those who petition for relief against them.

This reciprocal case arises based on my petitions in Kelly v Trump to the Delaware Chancery Court and the Delaware Supreme Court to correct judicial misconduct or mistakes, and to safeguard my exercise of religious beliefs substantially burdened by President Trump by the establishment of government religion exhibited by a course of conduct including but not limited to the passage and enforcement of certain executive orders.

If this US Supreme Court determines the DE State Court may not violate the Constitution by chilling the Constitutional check upon itself by vindictively punishing me for petitioning to correct, not destroy the court to preserve my 1st Amendment access to the courts and other Constitutional rights and claims based on the perceived Court agents' religious-political poverty animus than the basis for the PA reciprocal Order is eliminated. And this Court must overturn the PA Order placing my license on inactive disabled. Otherwise the Courts do not uphold the Constitution by favoring justices' personal interest in marketing their work and preserving their pay by preserving their government positions in violation of the Equal Protections Clause and the rule of law.

Allowing the Constitutional check upon the Court in a case and controversy upholds justice and proves the Courts and justices are not above the law, but are bound to the Constitutional application of the rule of law without bias and favoritism to the personal interest of judges in marketing themselves and maintaining their personal pay in violation of the 5th Amendment Equal Protections component.

Since the Constitution applies to the Courts, Appellee and the State Courts must not chill claimants, specifically me, for asserting my rights from infringement by the court to serve personal interests in egos or material gain.

On October 18, 2023, I filed a petition for rehearing.

On November 6, 2023, I submitted *Supplemental Brief* to provide additional information not previously available on how private partnerships with the UN is schemed to be used to eliminate judicial authority in open and by stealth, Petitioner's belief the courts are in danger especially with the debt ceiling approaching November 17, 2023 with no agreement to date, and the convening of Congress October 19, 2023 to attack Justice Thomas and the integrity of the court by subpoenaing witnesses to be used against Justice Thomas and the Court in *Meghan M. Kelly v Pennsylvania Disciplinary Counsel*, No. 22-7695 ("Supplemental Brief").

I also sent Clerk Robert Meek electronic versions of the Supplemental Brief via email on November 6, 2023.

Nevertheless, despite the US Police confirming it would be docketed prior to November 9, 2023, it was not.

This delay in docketing prejudiced me and vitiated my First Amendment right to petition and 5th Amendment right to be heard fairly and fully. So, on November 15, 2023 I filed *Emergency Application to reopen 22-7695 to consider Supplemental Brief filed 11/6/23 in order not to deprive me of 1st Amend right to petition fully & fairly in accordance w/5th Amend before eliminating 1st Amend rights to religious beliefs & license.*

The Court received this November 20, 2023 but returned it in error. In *Stokes v. Delo*, 495 U.S. 320, 323 (1990), "Delay or default by courts in the federal system must not be allowed to deprive parties, including States, of the lawful process to which they are entitled."

Robert Meek indicated the application as returned due to lack of jurisdiction, a legal determination in conflict with prior US Supreme Court case law.

The US Supreme Court held in *St. L. S.F.R.R. v. Spiller*, 275 U.S. 156 (1927) “Errors by court “due to mistake of the clerk **may be corrected after expiration of the term at which the judgment was entered**.” (“emphasis intended”)

Robert Meek indicated incorrectly this court did not have jurisdiction which is a determination which must be made by the Supreme Court justices not be clerks. See, *United States v. Finnell*, 185 U.S. 236, 249 (1902) (“The clerk is a ministerial officer, and, without statutory authority, can exercise no judicial functions. ”)

The US Supreme Court held in *Wetmore v. Karrick*, 205 U.S. 141, 142 (1907) “The judgment of dismissal of June 12, 1899, having been entered **improvidently through a mistake or oversight** as to an entry of record, the Massachusetts court **did not thereby lose jurisdiction**, and had the power to vacate the dismissal and restore the case to the docket after the term.

The US Supreme Court in *Wetmore v. Karrick*, 205 U.S. 141, 142 (1907), further held, “In almost every case in which the rule is laid down by this court that judgments cannot be vacated after the term, **judgments of dismissal by mistake are excepted**. See *Phillips v. Negley*, 117 U.S. 665”

However, I am deprived of the First Amendment access to the courts when the courts do not docket colorable pleadings by mistake or by whim. I am prejudiced by an unfair deprivation of my fundamental rights outlined in the Supplemental Brief by denial of access to the courts. Accordingly, I ask this Court to cure the defect by reopening the case to consider the Supplemental brief.

The Court in *United States v. Mitchell*, 20 F.3d 1480"held, “extreme delay in the processing of an appeal may amount to a violation of due process." *U.S. v. Mohawk*, 20 F.3d 1480, 1485 (9th Cir. 1994)

To date, the court has neither docketed nor rejected my supplemental brief dated November 6, 2023 with a letter outlining any deficiency and an opportunity to cure. It has been more than an entire month.

Early morning on December 1, 2023 I dropped off and submitted a Petitioner Meghan Kelly's Second Petition for a rehearing, dated November 30, 2023, I attach hereto without exhibits.

In the petition, I request this Honorable Court cure its defect by considering the November 6, 2023 Supplemental Brief this court neither accepted nor rejected.

Should this Court reject the Supplemental brief as opposed to cure the defect in the lack of the judge's consideration by failure to docket I require notice and an opportunity to correct any deficiencies of my good faith submission. *See Becker v. Montgomery*, 532 U.S. 757, 767 (2001).

On December 6, 2023, I checked with Case Manager to check on the status of the Second Petition. I indicated further delays in docketing may vitiate my access to the courts in further violation of my 1st Amendment right to access to the courts causing irreparable injury in terms of loss of First Amendment right to religious belief without government persecution because my petitions to safeguard my belief is inconvenient to the government.

The Second Petition for a Rehearing on the Court's **11/13/23 determination** in denying rehearing by granting writ of cert. I submitted in good faith with additional arguments relating to other **matters arising after 10/18/23** I do not have room to fit in here was rejected.

In *Marbury v. Madison*, 5 U.S. 137, 147 (1803) this Court held, "It is a settled and invariable principle, that every right, when withheld, must have a remedy, and every injury its proper redress. 3 Bl. Com. 109." I am prejudiced by the denial of access to the courts. Structural

error includes deterrence of right to appeal. See, *Borough of Duryea v. Guarnieri*, 564 U.S. 379, 387 (2011) (“This Court's precedents confirm that the Petition Clause protects the right of individuals to appeal to courts and other forums established by the government for resolution of legal disputes. ‘[T]he right of access to courts for redress of wrongs is an aspect of the First Amendment right to petition the government.’”); *Stokes v. Delo*, 495 U.S. 320, 323 (1990) (“Delay or default by courts in the federal system must not be allowed to deprive parties, including States, of the lawful process to which they are entitled. ”)

I respectfully request this court consider the Second Petition for a rehearing, attached hereto without exhibits to prevent manifest injustice by vitiating my fundamental rights without a full or fair opportunity to be heard given the disability status and the facts of this case.

I also sent Clerks Meek and Baker requests to hold onto the paper copies pending this petition, with a letter attached hereto sent separately to Baker. On 12/6/23, I also emailed Clerks Meek and Baker electronic copies of the Second Petition for rehearing that must be considered in the interest of justice so as not to vitiate my fundamental rights and to safeguard these United States from a schemed overthrow since it is an impossibility to print it out in a day to submit by the deadline under my circumstances.

I newly realized after looking at a similar case discussed in Affidavit 127 relating to similar issues, this Supreme Court’s staff previously appeared to deny my 1st Amendment right to petition and access to the courts fairly by not docketed a slew of other motions I refer to in attached to the Second Petition, and refer to in the 124th Affidavit attached hereto, including a motion to exempt copies under unique grounds.

The US Supreme Court previously docketed a petition to excuse the paper copies requirement, held it had authority to grant it, but denied it based on the facts of the case. *Snider*

v. All State Administrators, 414 U.S. 685 (1974). If the Court previously docketed a petition regarding exemption from additional paper copies, indicated it had authority to consider it, it arguably has authority to consider it and docket it in my case too. It was structural error to not docket the motion.

Nevertheless the US Supreme Court did not docket my similar filing I attach hereto as 124th Affidavit in Exhibit B. I will likely need to file this again and defects may be cured by docketing and allowing the court to grant or deny it. It is unfair when I am denied access to the court. Permitting me to file this motion in future case with judicial consideration cures past wrongs with correction without destruction of those who make mistakes and prevents additional manifest injustice.

This Court erred in depriving me access to the courts by delay in docketing cases especially in the civil rights case *Kelly v Swartz*, 21-3198 by failing to docket a petition for rehearing to Justice Jackson dated March 13, 2023 until about March 28, 2023, about 15 days later in Matter which deprived me of access to this Court to overturn the original disability order this reciprocal order is based, depriving me of an impartial forum to overturn the Order rendering collateral attacks in this case necessary for consideration not deference without deprivation to my access to the courts based on viewpoint of speech with courts rendering partiality to itself instead of the impartial application to the rule of law in my case as applied. (18th, 19th, 26th, Affidavits attached hereto)

Similarly, the PA Supreme Court Clerk Nicole Traini did not docket a number motions I discuss and attached to the Supplemental Brief including the 5th and 7th Affidavits available on the electronic docket incorporate herein by reference and in paper copies the Court retains. One concerns whether PA's denial of my asserted ADA claims relating to physical limitations where

I require time not only for a fair proceeding but sought a religious objection where I assert my right to preserve my life and health as a religious exercise and asserted religious objections to professional examination and treatment violating my 1st Amendment right to access to the courts applicable to the state via the 14th Amendment and 14th Amendment right to a fair proceeding.

The denial of access to the courts deprived me of a fair proceeding and procedural due process under the facts and request the PA Order be vacated. *Gentile v. State Bar of Nevada*, 501 U.S. 1030.

Despite my good faith invocation of the right to a fair proceeding under the 14th, the PA Clerk refused to docket my petition because my 1st Amendment rights applicable to the State via the 14th to religious beliefs were “unusual.” This Court in *United States v. Finnell*, 185 U.S. 236, 249 (1902) held, “The clerk is a ministerial officer, and, without statutory authority, can exercise no judicial functions.” Accordingly, it was improper for the clerk to deprive me of asserted fundamental rights by performing a judicial function. This error is structural requiring the PA Order be vacated.

Wherefore I pray this Court grants this petition.

1/7/23

Respectfully Submitted,
/s/Meghan Kelly
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