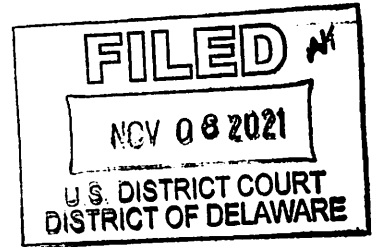


UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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



Plaintiff's Motion for Reargument

Plaintiff Meghan Kelly, pro se, brings this motion for reargument pursuant to FRCP Rule 59(e), and D. Del. 7.1.5 (a), on the order (D.I 17) in objection to and request to vacate each and every one of the court's findings denying my motions to expedite, for a temporary restraining order, a preliminary restraining order, exemption from bond, for emergency relief, motion to appear remotely, motion to electronically file, with a waiver of electronic filing fees, abstention under the *Younger* and the dismissal of this case, based on supremacy of federal law, the absence of opportunity for relief in state courts, essentially eliminating my ability to protect my fundamental rights 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. 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 "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 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. They may interplead if they so desire instead of wasting resources, although I prefer not to sue the court, only to protect my fundamental rights, especially to exercise my faith in Jesus. (Exhibit 3). The Court erred as a matter of law by indicating I could receive relief in state court, where no relief is afforded as the Chancery Court and Supreme Court participated in the facts that are the subject of this dispute, forcing Procedural and Due process violations and eliminating my access to the only court who may afford me relief, the District Court. Defendant is the initial judge, while I can argue illegality as a defense, Defendant and the coconspirator Court would wrongly grant immunity to any action I would have brought in state court, giving themselves power to be

above the law and Constitution as the courts participated in the conduct which is the cause of this action. “Congress, the Executive, and the Judiciary all have a duty to support and defend the Constitution.” *Salazar v. Buono*, 559 U.S. 700, 717 (2010). The conduct by the Chancery and Delaware Supreme Court are the subject matter of this dispute, sabotaging my case by attempting to mislead me to miss my deadline, directing me to cross off DE lawyer’s address to prevent service, petitions, and other activity. I petitioned the Chancery Court concerning disparate treatment against me, a party of one, and suppression of my First Amendment liberties by members of the Chancery Court, in addition to members of the Government by filing complaints in the Chancery Court against the Department of Elections and against Presidents Trump and Biden for their requirement I sacrifice my exercise in religious beliefs or other First amendment rights in exchange for the exercise of other rights. (D.I. 4, Exhibits A-4, A-5, 2, 5, and Appendix G), (D.I. 3 at Exhibits 12, 11, 17.) The Supreme Court justice, Judge Clark, and Chancery Court staff are expected to be witnesses to this case. See Exhibit 4. I petitioned the Delaware Supreme Court concerning government agents, acting under the color of law pressuring me to forgo Constitutional rights, with intent or to interfere, punish retaliate, substantially burden and obstruct my exercise of protected rights, motivated by their desire to suppress the exercise of my protected religious exercise, speech, petitions and association, in violation of federal law. 42 USC 1985(2), 1983, USC Section 1. (D.I.3, Exhibits 11, 12, 13.). The authority vested in Defendants under color of state law to conduct investigations and disciplinary proceedings for attorney misconduct do not permit the Defendants to knowingly violate the Constitution and federal laws including Conspiracy to harass, interfere or pressure a party, me, to forgo my case, motivated by their disdain to my poverty, association, religious exercise and beliefs manifesting in my speech and petition, and retaliate against a party for

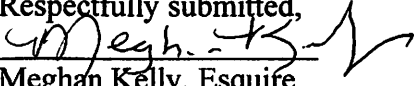
exercise of her civil rights, no matter how repugnant my religious beliefs may be, free will is more important than order and control, bending people's will making society less rich with truth and the free flow of diverse ideas, debate allows, by wrongfully bringing proceedings in violation of federal law as applied to me

State courts are unable to afford me relief to enjoin the wrongful proceedings against me since members of the Chancery Court and the Delaware Supreme Court likely participated in misconduct by making complaints to Defendants or to agents who made complaints to Defendants. Members of the Delaware Supreme Court were aware of the information DE-Lapp and Defendants refer are the reasons for their wrongful disciplinary proceeding against me. (D.I.). The Court cannot clean Defendants' hands because its own hands are dirty by involvement in conspiracy to interfere, harass, or pressure me to forgo my case, and in conduct retaliating against me motivated by their disdain for my religious beliefs manifested in speech in the petitions. I would be prejudiced in state court, and have a right to bring my federal claims in this federal court. I must be afforded opportunity to plead my case to prevent injustice, by the elimination of access to the only court able to afford me relief. The Chancery Court is the state court with jurisdiction to grant equity and injunctive relief. The Delaware Supreme Court, which has no jurisdiction to enjoin the Defendants pending a determination of my federal claims, only this Court has jurisdiction, without manifest prejudice and clear error of the law under the facts in the pleadings the court failed to consider. I would be prejudiced by elimination of my First amendment rights with no recourse in the proceedings below as members of the Delaware Supreme Court and Chancery Court appeared to participate in retaliation against me and the institution of the unconstitutional proceedings against me.

My letter to the Delaware Supreme Court, which may have been reviewed by all members of the Delaware Supreme Court is the reason why DE-Lapp alleged they instituted proceedings to investigating me under the guise of offering help, since all fees were paid, 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.

Wherefore, the Court must grant this order to prevent manifest injustice or to correct clear error. (Exhibit 5)

Dated November 6th 2021

Respectfully submitted,

Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
Unrepresented indigent party,
Bar No. 4968 (Word 3,631Count)

34012 Shownce Dr.
Dagsboro DE 19939



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U.S. DISTRICT COURT
DISTRICT OF DELAWARE

Office of the Clerk
United States District Court
844 North King St. Unit 18
Wilm., DE 19801-3570

RETURN RECEIPT
REQUESTED



Exhibit 1

**BOARD ON PROFESSIONAL RESPONSIBILITY OF THE
SUPREME COURT OF THE STATE OF DELAWARE**

In the Matter of) **CONFIDENTIAL**
a member of the bar)
of the Supreme Court) Board Case No. 115327-B
of the State of Delaware:)
)
MEGHAN M. KELLY,)
Respondent.)

**ODC'S PETITION TO TRANSFER MEGHAN M. KELLY, ESQUIRE
TO DISABILITY INACTIVE STATUS**

COMES NOW the Office of Disciplinary Counsel ("ODC"), by and through its counsel, Patricia Bartley Schwartz, and hereby petitions the Board on Professional Responsibility of the Supreme Court of Delaware ("Board") to transfer Meghan M. Kelly, Esquire ("Respondent") to Disability Inactive Status ("Petition") pursuant to Rule 19(c) of the Delaware Lawyers' Rules of Disciplinary Procedure ("Procedural Rules"). In support of its Petition, ODC avers the following:

1. Respondent is a Delaware lawyer admitted to the bar of the Delaware Supreme Court in 2007. Respondent is currently eligible to practice law, with no conditions or restrictions.
2. Delaware lawyers have a duty to conduct themselves in conformity with the standards imposed on members of the bar as a condition of the privilege to practice law.

3. As a licensed Delaware attorney, Respondent is subject to the jurisdiction of the Supreme Court and the Board on Professional Responsibility; “The Court has the inherent and exclusive authority to regulate and discipline members of the Delaware Bar.” *In re Abbott*, 925 A.2d 482, 484 (Del.2007 (quoting *In re Froelich*, 838 A.2d 1117, 1120 (Del.2003)); *In re Connolly*, 510 A.2d 484, 487 (Del. 1986)(recognizing the Supreme Court’s “supervisory powers over the Bar”). *See also* 10 *Del. C.* § 1906 and Procedural Rule 1(a).

4. Procedural Rule 19(c) requires ODC to investigate and initiate Board proceedings against a lawyer when there is “*information relating to a lawyer’s physical or mental condition which adversely affects the lawyer’s ability to practice law*” and it appears “*the interests of respondent’s clients or the public are endangered.*” Rule 19(c) (emphasis added). The Board proceedings are:

to determine whether the respondent shall be transferred to disability inactive status. The procedures and hearings shall be conducted in the same manner as disciplinary proceedings. *The Board may take or direct whatever action it deems necessary or proper to determine whether the respondent is so incapacitated, including the examination of the respondent by qualified medical experts at the respondent’s expense.*

Rule 19(c) (emphasis added).

5. Respondent’s conduct over the last year during a lawsuit filed in the Court of Chancery raises serious concerns regarding Respondent’s fitness to practice law.

6. In September 2020, Respondent filed a lawsuit in the Court of Chancery of Delaware against former-President Donald Trump: *Meghan Kelly v. Donald Trump*, Case No. 2020-0809 (September 21, 2020). The Court of Chancery dismissed Respondent's complaint. Respondent appealed to the Supreme Court of Delaware, which affirmed the Court of Chancery. On August 23, 2021, Respondent filed a writ of certiorari with the Supreme Court of the United States.

7. The factual averments, argument, and other content in Respondent's filings in the Delaware courts, raise serious concerns regarding her mental capacity to practice law. Respondent's statements and arguments: lack focus and clarity; are objectively illogical; and rely on non-legal sources, including the Bible, instead of appropriate legal authority. The following excerpts demonstrate, by way of example only, Respondent's apparent inability to make cogent, rational legal arguments:

13. The President's words and conduct supporting religion, as discussed below, were accepted as truth by many, thereby, instilling the belief, supporting the President's perceived thinking or conduct or his candidacy, despite all of his sinful misbehavior and in a way supporting his sins, as excusable without confession or without repentance, is supporting God, when I believe sinfully doing your own will leads to damnation. (Mark 8:34, "“Whoever desires to come after Me, let him deny himself (meaning not doing their own will, their own selfish, sinful desires, but exercise self-discipline, using their mind, their brain, which is their free will to do God's will, love), and take up his cross, and follow Me (by love in truth, not lusts in deception).”"); Also see, (Matthew 16:24, Luke 9:23 regarding the same message of personal sacrifice to follow Jesus).

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

(Respondent’s Second Amended Complaint filed in the Court of Chancery, attached as **Exhibit A**).

My goal is for this Court to pull out the roots of unrest, the weeds of greed stemmed under the guise of religious freedom, when it is whoredom, by barter or exchange, business, not freedom, at the cost of something more precious than money, my, and my fellow Americans’ freedom to worship or not according to the dictates of our own conscience without government-sponsored persecution, based on established government-religion.

* * *

I believe the Executive Orders tempt churches to partner with government in a bought, not free union of government-religion to serve Satan by chasing after money under the guise of God, as they exploit the needy to serve the greedy, including their own greed. God teaches us “to seek the kingdom of heaven first,” that we “cannot serve God and money, and that “the love of money is the root of all evil.” Citing *Matthew* 6:24-33, and 1 *Timothy* 6:10.

* * *

My God is not for sale for government gain. My God is not a whore for government officials to exploit like a high school mascot rallying behind their own glory and self-gain in government under the guise of Godliness, essentially making themselves their own gods, reflecting the image of the devil. See *Isaiah Chapter 14*, to see how the evil one misbehaved by seeking to make himself his own God.

(Respondent's Opening Brief filed in the Delaware Supreme Court, at 28 -29, 32, attached as **Exhibit B**).

8. Based on its concern regarding Respondent's mental fitness, ODC requested Respondent voluntarily submit to a mental health examination to determine her fitness and mental capacity to practice law.

9. Respondent refused, stating: "No, I will not be evaluated. I have religious opposition to mental health and healthcare ..." (Respondent's 8/23/21 email to ODC attached as **Exhibit C**) and "This email is to confirm, I will not be evaluated, as such evaluations violate my religious beliefs. I alerted the US Supreme Court to the same in my petition for writ of cert, relating to emotional damage related to the President's conduct." (Respondent's 8/28/21 email to ODC attached as **Exhibit D**).

10. Respondent's words and filings in Delaware courts constitute reasonable grounds to believe Respondent is unfit to practice law, unfit to represent

the interests of any clients, and pose a danger to the public and the administration of justice.

WHEREFORE, the ODC respectfully requests, pursuant to Procedural Rule 19(c), the Board enter an order requiring Respondent to submit to a mental health evaluation by a qualified mental health expert or take or direct other appropriate action it deems necessary or proper to determine whether the Respondent is incapacitated and, thereafter, convene a hearing to make findings of fact and recommend to the Supreme Court Respondent be immediately transferred to disability inactive status.

Dated this 3rd day of November 2021.

OFFICE OF DISCIPLINARY COUNSEL

/s/ Patricia Bartley Schwartz

Patricia Bartley Schwartz (#2841)

Disciplinary Counsel

Office of Discipline Counsel

405 N. King Street, Suite 420

Wilmington, DE 19801

(302) 651-3931

NOTE: Pursuant to Rule 9(d)(2) of the Delaware Lawyers' Rules of Disciplinary Procedure and Rule 15(a) of the Rules of Civil Procedure for the Superior Court of the State of Delaware, the Answer of Respondent to this Petition is to be filed with the Administrative Assistant to the Board on Professional Responsibility, The Renaissance Center, 405 N. King Street, Suite 505, Wilmington, DE 19801 with copies sent directly to the Office of Disciplinary Counsel, within 20 days after service, and in the event the Respondent fails to answer within the prescribed time, all of the allegations and charges in this Petition shall be deemed admitted.

**BOARD ON PROFESSIONAL RESPONSIBILITY
OF THE SUPREME COURT OF THE STATE OF DELAWARE**

In the Matter of a Member of)
the Bar of the Supreme Court of)
the State of Delaware:)

MEGHAN M. KELLY,)
Respondent.)

CONFIDENTIAL

Board Case No. 115327-B

CERTIFICATE OF SERVICE

I, Patricia Bartley Schwartz, Esquire, hereby certify this 5th day of November 2021, the within Office of Disciplinary Counsel’s Petition to Transfer Meghan M. Kelly, Esquire to Disability Inactive and Exhibits was caused to be served in the manner indicated below:

By Electronic Mail, Hand-Delivery and Certified Mail

Meghankellyesq@yahoo.com

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

OFFICE OF DISCIPLINARY COUNSEL

/s/ Patricia Bartley Schwartz
Patricia Bartley Schwartz (2841)
Disciplinary Counsel
405 N. King Street, Suite 420
Wilmington, DE 19801
(302) 651-3931

Exhibit 2

Re: Object to such appointment/object to service by email on Aug 23, and future service, to be met on date of official service per the rules

From: Meg Kelly (meghankellyesq@yahoo.com)

To: patricia.schwartz@delaware.gov; meghankellyesq@yahoo.com; 1id4megkelly@gmail.com

Cc: matthewkosiorek@comcast.net; mvavala@dsba.org; mbraden@bakerlaw.com; darin.mccann@coastalpoint.com; grolfe@newszap.com; marykmastro@gmail.com; tmastro@gmail.com; iadams@sidley.com; aggiekelly@comcast.net; mckayla.braden@gmail.com; chris.calio@yahoo.com; jday1632@gmail.com; christopher.johnson@gmail.com; mispillionink@gmail.com

Date: Friday, November 5, 2021, 09:32 AM EDT

Dear Ms. Swartz,

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, 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.

I wrote the email below in part because I may not receive communications as my computer is in repairs.

I prefer you understand my religious objections, even if you do not agree with them. I outlined some reasons in my pleadings in the district court.

I would like to see what your concerns are and see if we can address them with an understanding of each others position without litigation before the Board, and potentially before the Delaware Supreme Court.

I will likely have no internet at all should a federal shut down occur, and would like to keep you abreast of additional hardships I may face that may make it hard for me to communicate with you, should the worst happen.

Please take a week to think about it as my computer is in repairs.

My computer was wiped clean of all data from its August 23, 2021 crash after its previous repair. I lost everything last time.

I might be willing to talk with you from the law library where the law librarian will put me on speaker phone, so as to confirm I will not discuss your represented case.

Thank you,
Meg

On Thursday, November 4, 2021, 02:25:25 PM EDT, Meg Kelly <meghankellyesq@yahoo.com> wrote:

Dear Ms. Swartz,

The rules require service by certified mail and or personal service. I do not waive the date of service as required by the rules upon proper service. Please note, I did not receive a paper copy by US mail or otherwise of the August 23, 2021 letter.

Do not appoint counsel. I object to such appointment. I do not waive the right to represent myself, and will not pay any fees for such representation. I object to such appointment as insulting, harassing, humiliating and causing other

harm for the suggestion of such appointment and proceedings. I object on due process and other grounds, including but not limited to violations of my First amendment protected exercise of religion, speech, association, and petitioning, applicable to Defendants pursuant to the fourteenth amendment.

Poverty is not a disability. Increasing my poverty by adding to fees for the appointment of counsel, and violating my religious beliefs by appointing counsel, since my advocate is God, through the holy spirit, not man. I will stand and fall on my religious faith, no matter how much you increase the temptation for me to violate my faith by increased pressures.

My religious belief in Jesus Christ is not a disability. I also object on the lawless grounds upon which this proceeding was brought in violation of 42 USC sections 1985(2) and 1983.

I object to any and all fees and specifically object to representation fees as insulting, harassing and demeaning to bend your will based on profit at the elimination of my individual liberties.

I have a fundamental right to represent myself. You cannot take that away for your own convenience at the prospect of working with indigent, pro se parties.

Regards,
Meg

On Thursday, November 4, 2021, 02:06:01 PM EDT, Schwartz, Patricia (Courts) <patricia.schwartz@delaware.gov> wrote:

Ms. Kelly

The PRC met yesterday and approved the filing of the Petition to Transfer to Disability Inactive with the Board on Professional Responsibility. The ODC will serve a copy of the petition on you at the address on record with the Supreme Court and by email.

Pursuant to Procedural Rule 19(c) if you are not represented by counsel, the Court shall appoint counsel to represent you. If you are represented by counsel, please have counsel contact me at this email address. If I do not hear from your counsel by 5:00 pm Monday November 8, 2021, I will assume you are not represented and will notify the Court as such.

Patty Schwartz

Patricia Bartley Schwartz
Office of Disciplinary Counsel
Supreme Court of Delaware
405 N. King Street, Suite 420
Wilmington, DE 19806
Temporary number 302-668-3467
for iOS

From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Wednesday, November 3, 2021 9:01:59 PM
To: Schwartz, Patricia (Courts) <Patricia.Schwartz@delaware.gov>
Cc: Matthew <matthewkosiorek@comcast.net>; Mckayla Braden <mckayla.braden@gmail.com>; E. Mark Braden Esq. <mbraden@bakerlaw.com>; Ike Adams <iadams@sidley.com>; Tim Mastrogiacomo <tmastro@gmail.com>; Aggie Kelly <aggiekelly@comcast.net>; Glenn Rolphe <grolfe@newszap.com>; Darin McCann <darin.mccann@coastalpoint.com>
Subject: Re: November 3 meeting

My apologies for the typo, and so I will defer to your counsel.

On Wednesday, November 3, 2021, 09:59:28 PM EDT, Meg Kelly <meghankellyesq@yahoo.com> wrote:

Good evening,

Could you please let me know the determination of the November 3, 2021 proceeding? Additionally, could you please let me know whether you provided my response during the proceeding, as I opposed the proceedings conducted in interference and in retaliation of the exercise of my first amendment rights applicable to you pursuant to the Fourteenth Amendment, and in violation of 42 Sections 1985(2) and 1983?

Your counsel indicated I could talk with you regarding your wrongful action against me by bringing a proceeding against me for my belief in Jesus, and exercise of other First amendment rights. Your counsel properly instructed me not to correspond to you about the federal case, and so I will.

Thank you,
Meg

Exhibit 3

ODC or De-Lapp complaint/Who knew of the DE Supreme Court request for fee waivers

From: Meg Kelly (meghankellyesq@yahoo.com)

To: renee.buskirk@deiaware.gov

Cc: meghankellyesq@yahoo.com

Date: Tuesday, October 26, 2021, 01:47 PM EDT

Hi Renee,

Thank you for your help.

I filed a law suit against the ODC and others in the US District Court for conspiracy to interfere with my case and to impede justice and in retaliation for the exercise of my First Amendment rights.

Could you please ask the Chief Justice Collins J. Seitz, Jr., of the Delaware Supreme Court if he filed a complaint against me to get De-Lapp and the ODC involved. He was one of the two people who knew of my request for fee waivers.

If he was or was not, would he be willing to draft an affidavit to that? I would prefer not to subpoena him. I would prefer to withdraw my case, but the ODC is threatening to take away my license to practice law in response for my exercise of my protective First Amendment rights. i am not willing to forgo my constitutional rights or license i worked so hard for.

Thank you,
Meg

Exhibit 4

DE Supreme Court

From: Meg Kelly (meghankellyesq@yahoo.com)

To: margaret.naylor@delaware.gov

Date: Saturday, November 6, 2021, 09:05 AM EDT

Hi Peggy,

I think the Supreme Court seeks a defamation case against me in federal court, because of Justice Traynor's request for jury instructions. My mom is leaving today and my computer is getting fixed. I am so grateful for your help.

Very truly,
Meg

Hope your cat stays well.

Exhibit 5

Nov. 6, 2021

Kelly v. Office of Disciplinary Counsel
21-1490 (CFC)

Dear Honorable Clerk,

I am in great immediate danger,
and had no time to file a motion to
request permission to exceed ten pages.

I am sorry I squished paragraphs,
and must file this immediately, even
if imperfectly before the post
office closes.

My computer needs repairs.

Thank you,
Meg Kelly

34012 Shawnee Dr
Dagsboro, DE 19939
Bar #4968

I declare this is true and
correct under penalty of
perjury, dated Nov. 6, 2021

Meghan Kelly (printed)

Meghan Kelly (signature)

I declare under penalty of perjury that the Motion for reargument is true and correct.

Dated Nov. 6, 2021

Printed Meghan Kelly

Signed MD Meghan Kelly

UNITED STATES DISTRICT COURT IN THE DISTRICT OF
DELAWARE

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

CERTIFICATE OF SERVICE OF PLAINTIFF’S MOTION FOR
REARGUMENT OF ORDER

I, Meghan M. Kelly, Esquire, hereby certify that on this 6 day of November, 2021, had a true and correct copy of the foregoing, Motion for reargument, dated November 6, 2021 sent to all Defendants through their attorney, per their counsel’s request, including Defendants Disciplinary Counsel Patricia B. Swartz, Chief Disciplinary Counsel, David A. White, Disciplinary, Counsel Kathleen M. Vavala, Office, the Office of Disciplinary Counsel, Board of Professional Responsibility for the Supreme Court of Delaware, the Preliminary Investigatory Committee, and Defendant Delaware Attorney General Kathleen Jennings, in her capacity as the Attorney General for the State of Delaware at

Delaware Attorney General Kathleen Jennings
Delaware Department of Justice
Carvel State Building 820 N. French St.
Wilmington, DE 19801, served via first class mail:

Respectfully submitted,
Meghan Kelly

Meghan Kelly, Esquire
DE Bar Number 4968
34012 Shawnee Drive
Dagsboro, DE 19939

meghankellyesq@yahoo.com

Acting as unrepresented indigent
party, unrepresented by counsel

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

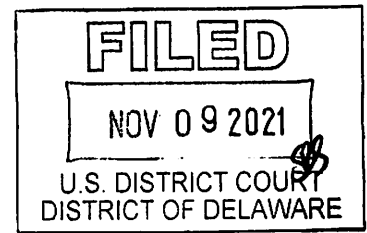
Meghan Kelly

Meghan Kelly, (printed)

Dated Nov. 6, 2021

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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



Plaintiff's Motion to Amend Plaintiff's Motion for reargument

Plaintiff Meghan Kelly, pro se, brings this motion to amend her motion for reargument pursuant to Pursuant to FRCP 15.

Pursuant to FRCP 15 (a)(1) (1) "A party may amend its pleading once as a matter of course within 21 days after serving." On Saturday November 6, 2021, I mailed a motion for reargument by certified mail, sent to both the Court and Defendant's counsel. On November 6, 2021, by separate US Mail, I sent the proposed order to the court and defendant's counsel. This is within 21 days.

My computer is broken and is in repairs. (Exhibit 1, proof of mailing.) I alerted Defendants through their counsel of my repairs, with attached pictures. (Exhibit 2 Email to counsel. Typing is not my strong point. My apologies.) Today, I was informed my computer is not fixed. (Exhibit 3, Email from insurance provider).

I am in immediate danger, and was required to send the Motion for reargument, on Saturday before noon to alert the court in hopes to prevent immediate irreparable injury to me and the public, on arguments I am likely to win under 42 USC Sections 1983, 1985(2), 1988 and the First Amendment applicable to Defendants pursuant to the Fourteenth, with no harm to Defendants, where Defendants' interests do not meet strict scrutiny, allowing them to persecute

me based on my beliefs in Jesus Christ. I had to send it regardless of typos, without opportunity to correct to prevent immediate, irreparable injury to me, and continuous irreparable injury to me.

I care more about my ability to exercise my religion freely, and openly without threat of government persecution than I care about my license, and ability to work at my old law firm performing real estate settlements down the line, as I do not enjoy litigation. So, I looked at registration to see whether I could deactivate my license to practice law. Even though I have not practiced law in 6 years, it indicated I could not deactivate my license due to the ODC filing on November 3, 2021. (Exhibit 4)

I came before the Court to protect my First Amendment rights, and subordinately prevent punishment for my faith in Jesus by Defendants who seek to place my active license on inactive disabled. It is insulting to me. My faith in Jesus is not a disability. My poverty is not a disability.

On Friday, November 6, 2021, I was served papers by Defendants seeking an order against me which would violate my faith in God by allowing them to examine me by a mental health expert. I should not be required to violate my faith in God risking losing my eternal life to maintain my license to practice law. Lawyers should not sell their souls for potential monetary gain, to lose their eternal life in the hopes to pursue justice. (Matthew 23:23, Amos 5:15, Matthew 16:26 “What good will it be for someone to gain the whole world, yet forfeit their soul? Or what can anyone give in exchange for their soul?,” Matthew 6: 24 ““No one can serve two masters. Either you will hate the one and love the other, or you will be devoted to the one and despise the other. You cannot serve both God and money.” I choose God).

I was so shaken up, my heart hurt so badly, and I was trembling as I rushed to the post office to prevent irreparable injury, that the post office official, April, called the police to check up on me as I indicated I was not safe from government sponsored threats motivated to suppress my speech, petitions, association and exercise of religious faith in Jesus Christ, based on their disagreement in my faith in Jesus. I said, “they are going after me for my faith in Jesus. (Exhibit 5, police report) I am permitted to worship or not according to the dictates of my conscience, not the dictates of the government.”

Defendants seek to declare my faith in Jesus a mental disability through official proceedings. What is next will they lock me up because my religious beliefs do not conform to their expectations.

I was under great distress, and remain under great reasonable distress. My heart is hurting.

A state trooper made a wellness check November 6, 2021. I was humiliated and embarrassed to share my religious beliefs, persecution, and poverty with the kind State Trooper. I told the trooper that a stranger talked about shooting me in Dagsboro because of my stickers. He asked, “Why didn’t you call the police.” I responded I thought I did. I went to the state police, Millsboro, Dagsboro and Bethany police department to retrieve the report too. I did not realize until November 7, 2021, after I thought about it, that the fully uniformed officer I told, who inspected my car at World Gym in Millsboro, was probably acting a fellow kind gym mate, acting off duty or outside of his jurisdiction. (Exhibit 6, car with substance thrown at it for my speech).

Per my Complaint at paragraphs 42, 48, 89, 98, 112, 149, 156, 201, 268-290, 292-294, 306-308, 365-480, D.I. 2, D.I. 3, D.I. 4, with focus on US Ex 43 relating to healthcare, US Ex 2 the law suit against the Democrats regarding healthcare concerns, Exhibits 21-25 my emails providing notice for Defendants to desist based on religious objections to examinations District Court, Us Exhibit the outline of my religious objections in my writ of certiorari, the outline of my rejections to mental healthcare in my motion to the Delaware Supreme Court, and Exhibit A-4, my motion to the Delaware Supreme Court to reign in its arms through its agents from unlawfully pressuring me to forgo or impede my case to protect my free exercise of religion by relief it deems just, where I declare my objections to psychology and mental health..

I was under great distress, and remain under great reasonable distress should you find my beliefs are genuine.

A state trooper, Officer Partyka, made a wellness check November 6, 2021. I was humiliated and embarrassed to share my religious beliefs, persecution, and poverty with the kind state trooper.

I told Officer Partyka that a stranger talked about shooting me in Dagsboro because of my stickers. He asked, "Why didn't you call the police." I responded I thought I did. I went to the state police, and the Millsboro, Dagsboro and Bethany police department to retrieve the report. I did not realize until November 7, 2021, the fully uniformed officer I told, who inspected my car at World Gym in Millsboro after someone threw substance all over it but for my stickers, "No one is above the law, No one is below the law," "Impeach," "Serve your country not your seat," was probably a fellow kind gym mate, acting off duty or outside of his jurisdiction. (Exhibit 6, a picture of substance on my car). That is why I could not retrieve the report I looked for. D.I. 2, 3, 4.

Defendants also threatened to file a motion on November 8, 2021, to have an attorney appointed for me. I objected on religious grounds, which also shook me up. Per my Motion and Memorandum for a preliminary injunction and complaint, going into debt is against my religious beliefs. D.I. 6, 7,8, 9,10.

I objected to appointed counsel on religious grounds. 1. Going into debt violates my religious beliefs 1. as outlined in the preliminary motion and memorandum, and 2. I believe God is my advocate in the disciplinary proceeding.

In John 14:26, Jesus taught, “the Advocate, the Holy Spirit, whom the Father will send in My name, will teach you all things and will remind you of everything I have told you.”

In Mark 13:11, Jesus taught, “Whenever you are arrested and brought to trial, do not worry beforehand about what to say. Just say whatever is given you at the time, for it is not you speaking, but the Holy Spirit.”

It is against my religion to allow an attorney advocate to defend my religious beliefs in the disciplinary proceeding. An attorney advocate is not in the position to stand up for my beliefs in the disciplinary proceeding.

As to the case before you, I am not so sure. I need to pray about it. The cases relate to my religious beliefs. My beliefs are at issue.

With regards to exams and alleged mental health, I believe people lose eternal life for relying, performing, recommending and allowing the conduct of mere man to examine the will of another by examinations relating to alleged mental health, psychology or behavioral theory. I believe the mental healthcare industry teaches the way to hell guaranteed by tempting man to bend their will to their own desires or the will of the world, conditioning them to live

conditionally, instead of laying down their will to love God unconditionally, and subordinately to love others, unconditionally, unearned, as yourself.

I believe lost people seek happiness. Children of God seek holiness. The happiest people have hardness of heart. Since they are either ignorant of the evils of the world, or they do not care to love those who inconvenience them, which is not violating Jesus's commands by organized charity or fundraising which leads to hell. It is not referring people to government resources either. Love is sacrificing from self in secret to care for another at a worldly lose for a Godly gain. (Matthew 6:1-5.)

My belief in Jesus Christ, what he says, is not popular. Jesus commands us to call no one our teacher but God. I believe churches will go to hell as they mislead many there for asking other people for money to give to others, instead of merely asking for their own needs, or giving from self in secret to care for others with no worldly reward, not taking from others to give to those in alleged need, in direct violation of Jesus Christ's commands in Matthew 6:1-5. This same religious violation, Matthew 6:1-5, is why I sued the democrats to run for office without violating my faith as asking for signatures or donations would compromise my beliefs, wrote the US Supreme Court concerning running for President, and is a major concern in the lawsuit I filed against President Trump, and hoped to file against president Biden by substitution. D.I. 4, Ex 2, Ex 50, Ex 51. I believe the rise in religious persecution against me and others in the country relate to the executive orders I mentioned in my complaint, creating a bought or bartered for union of government-religion, that is based on business not freedom, making my God a product to buy and sell. Per John 2:16, those who worship by business are not welcome I church or in heaven per Jesus.

Jesus teaches “blessed are those who mourn,” meaning mourn at sin, our own and the world’s, not blessed are the happy. (Matthew 5:4, Hebrews 12:14,” Be holy, without holiness no one will see the Lord.”) Rather they are in danger of damnation, without repentance for seeking their own happiness above God’s will. Even children go to hell per Ezekiel chapter 9 for their unconcern.

Children are trained to give into temptations young to make deceiving businesses money, learning to go to hell young by conditionally caring based on date for holidays and birthdays by societal conformed pressure which is not unconditional love. Jesus teaches us do not adhere to the traditions of men at the cost of violating God’s law of truth in love. Mark 7:8, “Do not be conformed to the world.” I should not be conformed to the world in order to exist in the world. Romans 12:2. See, 1 John 5:19, “We know that we are children of God, and that the whole world is under the control of the evil one.” My different beliefs do not make me a threat, nor do they make me disables. The fact I care more for God, and subordinately for humanity than money, material gain and merriment makes me a Christian.

Per my pleadings, I am a licensed teacher too. Most teachers learned psychology and behavioral theories predominantly B. F. Skinner. Skinner taught there was no such thing as unconditional love, that people live based on conditional relationships (including societal peer pressure), reward and avoidance of harm. My God teaches me this is the mark of the beast, also called children of the devil, the whore, adultery with God, the lost, the unsaved, those not yet adopted by God. Christians are known by their love. Love is unconditional, not merely living conditionally by conformed behavior, relationships, reward and avoidance of harm.

Children are taught in schools that listening is love. Through conditional operant theory children learn the lie love must be earned conditionally. Accordingly, they examine whether

someone earned an ear. They are discouraged from listening, learning and become dumb and blind adults, who are less likely will be saved from hell, by seeking truth in all things, rather than ignoring it. (See, Hosea 4:6, “my people are destroyed from lack of knowledge.”) Throughout the bible, we learn not knowing is guilt that damns people to hell. Christians are called to shed light to expose the temptations leading to harm and hell, not cover it up with more darkness by ignoring it. Ignorance is guilt to God. (See, Ephesians 5:11, “Have nothing to do with the fruitless deeds of darkness, but rather expose them.”)

I believe our healthcare harms lives and guarantees damnation in hell, by eliminating people’s ability to use their brain, diminishing their faculties. They feel better by feeling nothing. I believe people must use their brain, their mind, to consciously choose to do God’s will to love God and one another, not seeking happiness but holiness. I believe forced comas and drugs that inhibit people’s faculties prevent them from going to heaven, and guarantee their damnation in hell, and the damnation in hell for the unconcern of by standers. I believe the last day of people’s lives seals their eternity.

I took a course at UD on healthcare, and studied healthcare law and healthcare finance at law school, due to my own personal bad healthcare experience. per US Exhibit 43. I drafted a newspaper article outlining how to amend the laws to care for patients, as opposed to sinning by exploiting patients to serve profit. I also proposed a way to transition into universal care. Healthcare brings in more money than any other industry in the world, wrongly exploiting desperate conditions to get as much as they can for as little as they can, at the cost of loss to health, life and eternal lives. D.I. 3, District Court Ex 6, See, <https://www.worldometers.info/>. The second most lucrative industry is healthcare marketing under the guise of education, per worldometer. D.I. 4.

Our laws reward profit and do not protect true treasures, people. Laws may be revised by legislative pen or by case law to care for humanity and improve healthcare for our elderly, the sick, and the common population without increasing monetary costs or throwing money at it, wrongly teaching money is God. Jesus teaches you cannot serve God and money. I believe those who focus on money as savior are not saved from hell regardless as to whether they are churches, businesses or not for profits practicing charity in violation of Matthew 6:1-5, which I believe leads to the sin of deception, hardness of hearts misleading many to lose eternal life to be thrown into the fire the last day.

Defendants threaten me with the fires of hell.

Defendants also threatened to file a motion on November 8, 2021, to have an attorney appointed for me. I objected on religious grounds, which also shook me up. Per my Motion and Memorandum for a preliminary injunction and complaint, going into debt is against my religious beliefs.

I objected to counsel on a second religious ground as I believe God is my advocate in the disciplinary proceeding. In John 14:26, Jesus taught, “the Advocate, the Holy Spirit, whom the Father will send in My name, will teach you all things and will remind you of everything I have told you.” In Mark 13:11, Jesus taught, “Whenever you are arrested and brought to trial, do not worry beforehand about what to say. Just say whatever is given you at the time, for it is not you speaking, but the Holy Spirit.”

It is against my religion to allow an attorney advocate to defend my religious beliefs in the disciplinary proceeding. An attorney advocate is not in the position to stand up for my beliefs in the disciplinary proceeding.

With regards to the the case before you, I am not so sure whether counsel would be sin. I need to pray about it. The cases relate to my religious beliefs. My beliefs are at issue. Most people believe differently, even my own family. I did look into whether they would help, and was not able to receive help due to conflicts or other reasons.

My belief in Jesus Christ, what he says, is not popular. Jesus commands us to call no one our teacher but God. I believe churches will go to hell as they mislead many there for asking other people for money to give to others, instead of merely asking for their own needs, or giving from self in secret to care for others with no worldly reward, not taking from others to give to those in alleged need, in direct violation of Jesus Christ's commands in Matthew 6:1-5. This same religion religious violation, Matthew 6:1-5, is why I sued the democrats to run for office without violating my faith as asking for signatures or donations would compromise my beliefs, wrote the US Supreme Court concerning running for President, and is a major concern in the lawsuit I filed against President Trump, and hoped to file against president Biden by substitution.

I believe the rise in religious persecution against me and others in the country relate to the executive orders I mentioned in my complaint, creating a bought or bartered for union of government-religion, that is based on business not freedom, making my God a product to buy and sell. Per John 2:16, those who worship by business are not welcome I church or in heaven per Jesus.

This belief conflicts with the beliefs of my own family, including attorneys. It appears I must stand and fall on my faith in God alone for now.

I am also perplexed by the Delaware Supreme Court's participation, should it be based on the exercise of my First amendment right to exercise religion, speak, associate and petition. I

cried about that since I look at them as potential eternal life savers, guiding the misguided with mercy and correction to prevent harm here and condemnation for eternity.

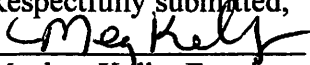
Should the Supreme Court merely care about my poverty and basic needs making the complaint to the arms of the court, instead of seeking to maliciously suppress my exercise of fundamental rights based on disdain for my religious beliefs, I would be grateful.

In that case, Defendants improperly acted. They should have waited after the case, and acted out of concern, not condemnation. I suspect the Supreme Court is defensive, and believe they seek to sue me now, for improper purposes. I am sad even thinking about the evidence indicating to their participation. Only your court can resolve this dispute.

Attached, please find my amended Motion for reargument, and a blackline thereto.

Wherefore, I respectfully request this Court grant my order.

Dated November 8, 2021

Respectfully submitted,

Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
Unrepresented indigent party,
Bar No. 4968 (Word 3,319 Count)

UNITED STATES DISTRICT COURT IN THE DISTRICT OF
DELAWARE

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

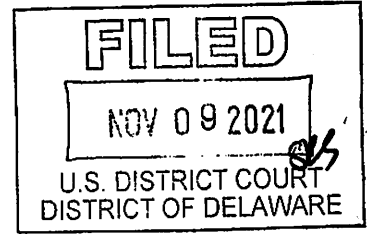
ORDER

HAVING CONSIDERED Meghan Kelly's' motion for reargument, IT
IS SO ORDERED

1. Plaintiff's motion to amend motion for reargument is granted

Dated: _____ Judge _____

Exhibit 1





DAGSBORO
28290 CLAYTON ST
DAGSBORO, DE 19939-9998
(800)275-8777

11/06/2021 12:00 PM

Product	Qty	Unit Price	Price
First-Class Mail® Large Envelope Wilmington, DE 19801 Weight: 0 lb 6.20 oz Estimated Delivery Date Tue 11/09/2021	1		\$2.36
Certified Mail® Tracking #: 70210350000131665646			\$3.75
Return Receipt Tracking #: 9590 9402 6766 1074 8891 56			\$3.05
Total			\$9.16
First-Class Mail® Large Envelope Wilmington, DE 19801 Weight: 0 lb 5.90 oz Estimated Delivery Date Tue 11/09/2021	1		\$2.16
Certified Mail® Tracking #: 70210350000131665653			\$3.75
Return Receipt Tracking #: 9590 9402 6766 1074 8891 63			\$3.05
Total			\$8.96
Grand Total:			\$18.12
Cash			\$20.00
Change			-\$1.88

USPS is experiencing unprecedented volume increases and limited employee availability due to the impacts of COVID-19. We appreciate your patience.

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit www.usps.com USPS Tracking or call 1-800-222-1811.

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Wilmington, DE 19801

Certified Mail Fee	\$3.75	0939
Extra Services & Fees (check box, add fee as appropriate)	\$3.05	03
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$2.36	
Total Postage and Fees	\$9.16	11/06/2021

Sent To **Del. Atty. General**
Street and Apt. No., or PO Box No.
Kathleen Jennings 820 N. French St
City, State, ZIP+4®
Wilm. DE 19801

PS Form 3800, April 2015 PSN 7530-02-000-907 See Reverse for Instructions

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Wilmington, DE 19801

Certified Mail Fee	\$3.75	0939
Extra Services & Fees (check box, add fee as appropriate)	\$3.05	03
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$2.16	
Total Postage and Fees	\$8.96	11/06/2021

Sent To **Office of the Clerk U.S. Dist. Ct.**
Street and Apt. No., or PO Box No.
844 North King St Unit 15
City, State, ZIP+4®
Wilm., DE 19801-3570

PS Form 3800, April 2015 PSN 7530-02-000-907 See Reverse for Instructions

Please attach to
Meghan Kelly's Motion for
Reargument Case 21-1490
(CFC)
Thank you.

Exhibit 2

Fw: 1643532266; ROBERT KELLY

From: Meg Kelly (meghankellyesq@yahoo.com)

To: zi-xiang.shen@delaware.gov; ryan.costa@delaware.gov

Cc: meghankellyesq@yahoo.com

Date: Tuesday, November 2, 2021, 07:52 PM EDT

Good evening,

Good evening,

I will be without my computer, as it gets repaired.

Please forgive me for any delays in responding to these most urgent matters.

Very truly,
Meg

--

On Tuesday, November 2, 2021, 09:56:08 AM EDT, AMAZON APT <amazonapt@asurion.com> wrote:

Hello! You can reply back with pictures to this email n we can forward to the servicer however the unit will still need to be sent in as well. Make certain that you include detailed info as to what it is doing n not doing as well. Thanks again for all of your help!

34012 SHAWNEE DR

DAGSBORO DE 19939

UNITED STATES

Thanks again for all of your help!

glendon

asurion.com

asurion



IMG_1906.JPG
1.3MB



IMG_1907.JPG

Exhibit 3

Your repair is still underway

From: Product Protection Team (statusupdate@retail-email.asurion.com)

To: meghankellyesq@yahoo.com

Date: Monday, November 8, 2021, 12:34 AM EST

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Exhibit 4



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Request Status Change

DELAWARE SUPREME COURT
APPLICATION FOR A CERTIFICATE OF INACTIVE STATUS

To the Supreme Court of Delaware:

Pursuant to Supreme Court of Delaware Rule 69(d)(i), I herewith apply for a Certificate of Inactive Status and state that I am not actively engaged in the practice of law in Delaware. I have completed and returned my Annual Registration Statement.

I certify that there are no charges pending or threatened against me before any court, the Board on Professional Responsibility, or any similar disciplinary agency in this or any other jurisdiction. I further certify that I do not know of any facts respecting my conduct which would result in the filing of charges or disciplinary action against me.

Supreme Court ID 004968

SIGNATURE _____ (e.g. /s/John Q. Public, Esq.)

Save Cancel

All technical questions regarding the DESCLMS system should be directed to the doeLegal helpdesk, by telephone, (302) 798-7500, or e-mail, helpdesk_descs@doelegal.com.

All questions regarding the Annual Registration Statement should be directed to Lisa A. Dolph, Clerk of the Delaware Supreme Court, by telephone, (302) 739-4155, or e-mail, lisa.dolph@delaware.gov.

All questions concerning the Certificate of Compliance or Pro Hac Vice Renewals should be directed to The Lawyers' Fund for Client Protection (LFCP):

Last Name A-Z - Mason Vannucci, (302) 651-3930, Mason.Vannucci@delaware.gov

All questions concerning CLE should be directed to The Commission on Continuing Legal Education (CLE):

Last Name A-N - Margot Millar, (302) 651-3941, Margot.Millar@delaware.gov

Last Name O-Z - Mason Vannucci, (302) 651-3930, Mason.Vannucci@delaware.gov

Exhibit 5

Page 001	Report Date 11/06/2021	Agency TROOP 4 STATE POLICE	Complaint Number 04-21-082395
Reported Date and Time Sat 11/06/2021 1218		Field Service Report	Occurred Sat 11/06/2021 1218
Location: 34012 Shawnee Dr, Black Water Village, Dagsboro, DE 19939 0.02 Miles Southwest of Trails			
Grid 202 - 074	Sector 44	County Sussex	Domestic Related <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
			Gen Broadcast Sent? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
			Gang Related? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
			Gun Related? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Officer Weapon Involved: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Officer Weapon Type:	Officer Weapon Use:	Emergency Order Related: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
			Hero Help Referral: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Crimes and Associated Information

Victim Number 000	Crime Seq 001	Statute	Crime Description
Location of Offense		Status	Involvement <input type="checkbox"/> Alcohol <input type="checkbox"/> Drugs <input type="checkbox"/> Computer
Suspected Hate/Bias <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No - N/A		Crime Code F020 - Check on Well Being	

Witness Information

Sequence 001	Type Person Contacted	Name KELLY , MEGHAN M	Sex Female	Race White
34012 Shawnee Dr Blackwater Vlg Dagsboro, DE 19939			Home Telephone	Cell Phone
Sequence 002	Type Reporting Person	Name IERVOLINO , APRIL D	Sex Female	Race White
33594 Herring View Dr Lewes, DE 19958			Home Telephone	Cell Phone
Employer/School POST OFFICE 28290 Clayton St United Post Office Dagsboro, DE 19939			Work Telephone (800) 275-8777	

Investigative Narrative

I was dispatched to a check on the welfare of PC-1 Meghan Kelly at above location. I responded to above location and made contact with PC-1 Meghan Kelly. She advised that she was okay and I explained that the RP April Iervolino called because she did not see her when she delivered the mail today. RP April wanted the police to check on her well being.

I attempted to call back the RP April with negative results as the Dagsboro Post Office was closed.

I cleared the check on the welfare by Service Clear and no further action was taken.

Reporting Officer M/CPL PARTYKA - 00179 0	Supervisor Approval Andrew Partyka PSPT179 11/06/2021
Detective Notified	Referred To
Solvability <input type="checkbox"/> Witness <input type="checkbox"/> M.O. <input type="checkbox"/> Suspect Located <input type="checkbox"/> Suspect Described	<input type="checkbox"/> Trace Stolen Property <input type="checkbox"/> Suspect Identified <input type="checkbox"/> Suspect Named <input type="checkbox"/> Suspect Vehicle Identified
Status Closed	

Exhibit 6

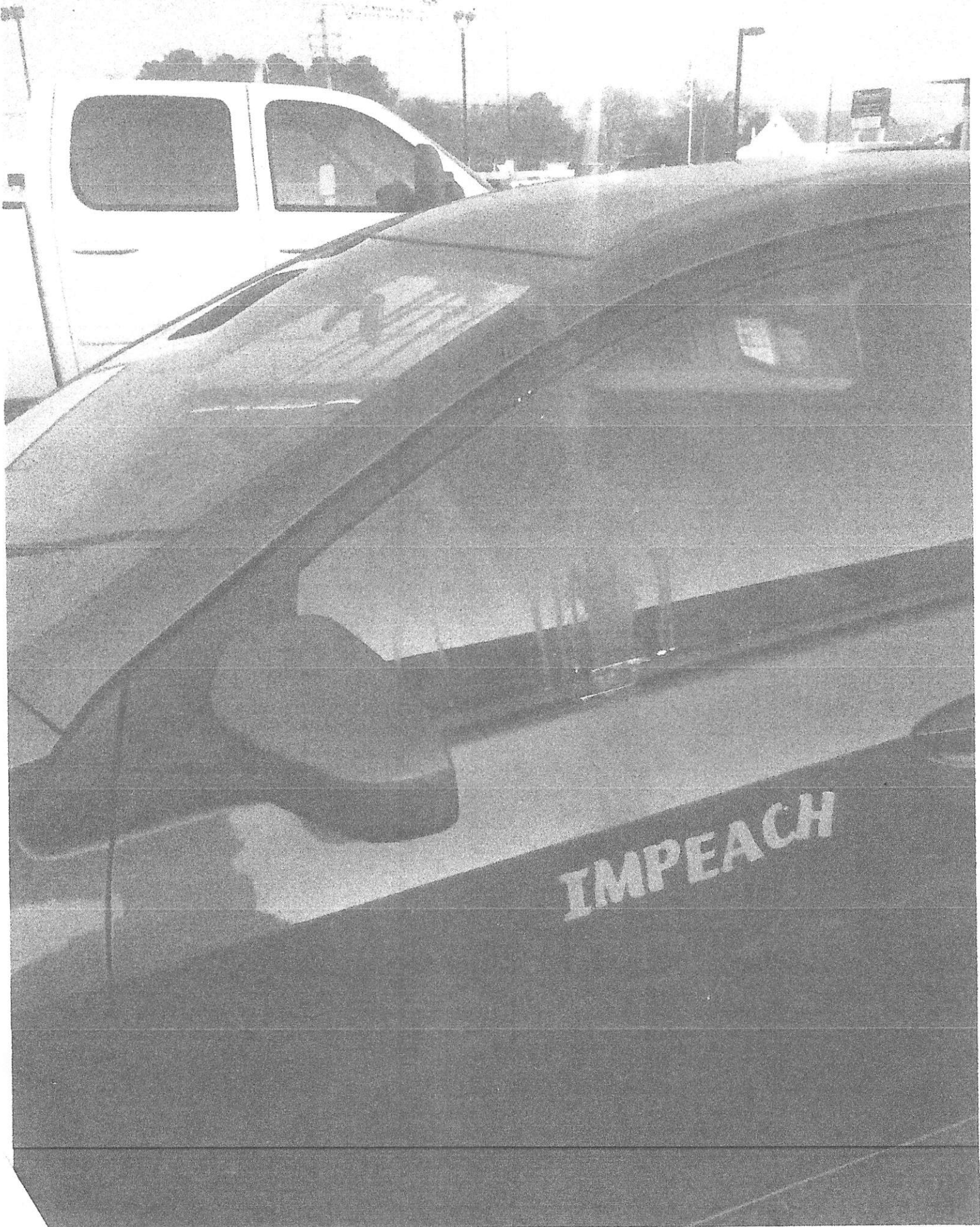


Exhibit 7

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

Plaintiff's Amended Motion for Reargument

Plaintiff Meghan Kelly, pro se, brings this motion for reargument pursuant to FRCP Rule 59(e), and D. Del. 7.1.5 (a), on the order (D.I 17) in objection to and request to vacate each and every one of the court's findings denying my motions to expedite, for a temporary restraining order, a preliminary restraining order, exemption from bond, for emergency relief, motion to appear remotely, motion to electronically file, with a waiver of electronic filing fees, abstention under the *Younger* and the dismissal of this case, based on supremacy of federal law, the absence of opportunity for relief in state courts, essentially eliminating my ability to protect my fundamental rights through access to the courts in exchange for my license to practice law, sacrificing individual liberties including my religious exercise, speech, association and petitioning the court for relief against disparate treatment towards me by government agents motivated by their disagreement with my religious exercise, petitions, poverty, association and or speech. (D.I. 1-19).

The Court erred as a matter of law by denying all of my motions and dismissing my case per the arguments and facts stated therein. I face irreparable injury that cannot be addressed or prevented in state court, only this court has jurisdiction to grant relief, under the facts of this case. The Court must consider my pleadings before dismissing my arguments, which cannot be brought in other courts as claims.

I also seek to vacate the Order because the Court erred as a matter of law by disregarding all my pled facts, pled legal arguments. The Court abused discretion by disregarding the facts and legal arguments I pleaded in the complaint and motions, and by making no determination on such arguments

considering the immediate irreparable injury I continue to face. The Court made an error of apprehension. *Id.* Even on a Motion to dismiss the Court is required to consider “whether the allegations on the face of the complaint, taken as true, allege facts sufficient to invoke the jurisdiction of the district court.” *Licata v. U.S. Postal Serv.*, 33 F.3d 259, 260 (3d Cir. 1994). The Court abused its discretion by ignoring, failing to address all the facts and pleadings in my complaint and motions before dismissing a case, related to fundamental rights requiring strict scrutiny to be upheld. Defendants face no irreparable harm. I am not working and have not represented anyone but myself, as an attorney in years, and will not represent anyone anytime soon. I sought to make a difference differently by attempting to revise the laws over the years. I believe religion and state must be separate. People should worship or not according to the dictates of their conscience, not the dictates of the government through their partners, including religious entities. When my religious liberties were at stake, I gave up public office aspirations for God, in hopes the Courts would safeguard our religious freedoms.

I am not asking the Court to make a disciplinary determination. I am asking the Court to, *inter alias*, (1) enjoin the Disciplinary Proceedings until a determination is made, leaving time for appeals to determine whether the conduct by the defendants violated the first amendment applicable to defendants pursuant to the fourteenth amendment concerning my free exercise of religion, speech, association, and petitioning the government to address grievances, 42 USC §§ 1985(2), 1983 (“federal law”), and (2) determine whether the proceedings themselves are a violation of federal law. (D.I. 1, 2, 3, 4, 9, 10, 7, 8, 6, 12, 11, 14.) (1) The conduct by Defendants and the coconspirators as pled are a violation of federal law, and (2) the proceedings themselves are a violation of federal law. (D.I. 1-19). I did not ask the court to conduct a disciplinary trial.

The Court abused its discretion by ignoring the laws, facts and analysis in my pleadings and motions. The Court abused its discretion by failing to grant me relief in my motions, disregarding all facts and legal arguments. Injunctive relief while the main relief, is not the only relief I requested. Protection of my freedom of speech, religious exercise, association and right to petition, despite religious

beliefs, poverty, unemployment, and profession is something I seek to protect which is far greater than my active license to practice law, or all the money in the world, for freedom cannot be bought and sold.

The Constitution and Federal laws supersede state law arguments. The court ignored superseding constitutional issues, arguments and facts related to those issues, blinding its eyes guaranteeing injustice towards me, and similarly situated parties who are not below the law by poverty or pro se status, but are afforded Constitutional protections to exercise their First Amendment rights without retaliation or interference by government agents acting under the color of law seeking to suppress or punish claimants for their exercise of fundamental liberties. The cloak of color of law by Defendants, and government agents, does not give the government lawless reign, constitutional immunity to violate the Constitution, with no accountability for such violations by using the color of the law to obstruct and prevent my access to the courts. The color of the law acts as both the sword and shield per (D.I.15 and D.I. 16), rendering the Court and the arms of the Court above the law, above the Constitution, and must be overturned to prevent clear injustice.

The Court erred by not considering or even addressing my fundamental rights and Constitutional arguments which preempt state law proceedings.

The Court erred by ignoring the Chancery Court's staff's and Delaware Supreme Court Chief Justice' apparent participation in the retaliation, and intentional interference to obstruct, harass, interfere, or pressure me to forgo my case, Kelly v Trump, by instigating DE-Lapp and ODC proceedings against me motivated by their disdain for my personal, religious affiliated beliefs, speech reflected the same, exercise of my right to petition, poverty, association and religious exercise, in violations of 42 USC Sections 1983, and 1985(2), and First Amendment violations applicable to Defendants pursuant to the Fourteenth amendment. (D.I. 1-D.I 17).

The evidence shows the Delaware Supreme Court justices partook in the federal law violations. The Defendants and DE-Lapp and coconspirators allege they brought the complaint due to petitions I filed with the Delaware Supreme Court. (D.I. 3, and D.I. 10, D.I. 8, De-Lapp Letter and A-4, A-5). Only the Delaware Supreme court judges knew of my petition to suspend lawyer fees for all unemployed

lawyers due to the pandemic, albeit Mark Vavala knew too. Only DE Justices knew of my pleadings as no party responded. The source of the wrongful complaint against me brought to interfere and punish me for my exercise of fundamental rights and belief in Jesus appears to be rooted in the DE Supreme Court's instigation who will be complainant, judge and jury against me in a proceeding brought in retaliation and interference of my exercise of civil rights, motivated by their desire to suppress my religious associated beliefs. It is injustice guaranteed as the Supreme Court appears to have partaken in federal law violations against me.

It would be improper for me to name the Court as a party since I had a case before them, but it appears the Court may seek to sue me, and I no longer have a case before them. They may interplead if they so desire instead of wasting resources, although I prefer not to sue the court, only to protect my fundamental rights, especially to exercise my faith in Jesus. (Exhibit 3).

The Court erred as a matter of law by indicating I could receive relief in state court, where no relief is afforded as the Chancery Court and Supreme Court participated in the facts that are the subject of this dispute, forcing Procedural and Due process violations and eliminating my access to the only court who may afford me relief, the District Court. Defendant is the initial judge, while I can argue illegality as a defense, Defendant and the coconspirator Court would wrongly grant immunity to any action I would have brought in state court, giving themselves power to be above the law and Constitution as the courts participated in the conduct which is the cause of this action. "Congress, the Executive, and the Judiciary all have a duty to support and defend the Constitution." *Salazar v. Buono*, 559 U.S. 700, 717 (2010).

The conduct by the Chancery and Delaware Supreme Court are the subject matter of this dispute, sabotaging my case by attempting to mislead me to miss my deadline, directing me to cross off DE lawyer's address to prevent service, petitions, and other activity. I petitioned the Chancery Court concerning disparate treatment against me, a party of one, and suppression of my First Amendment liberties by members of the Chancery Court, in addition to members of the Government by filing complaints in the Chancery Court against the Department of Elections and against Presidents Trump and Biden for their requirement I sacrifice my exercise in religious beliefs or other First amendment rights in

exchange for the exercise of other rights. (D.I. 4, Exhibits A-4, A-5, 2, 5, and Appendix G), (D.I. 3 at Exhibits 12, 11, 17.) The Supreme Court justice, Judge Clark, and Chancery Court staff are expected to be witnesses to this case. See Exhibit 4. I petitioned the Delaware Supreme Court concerning government agents, acting under the color of law pressuring me to forgo Constitutional rights, with intent or to interfere, punish retaliate, substantially burden and obstruct my exercise of protected rights, motivated by their desire to suppress the exercise of my protected religious exercise, speech, petitions and association, in violation of federal law. 42 USC 1985(2), 1983, USC Section 1. (D.I.3, Exhibits 11, 12, 13.). The authority vested in Defendants under color of state law to conduct investigations and disciplinary proceedings for attorney misconduct do not permit the Defendants to knowingly violate the Constitution and federal laws including Conspiracy to harass, interfere or pressure a party, me, to forgo my case, motivated by their disdain to my poverty, association, religious exercise and beliefs manifesting in my speech and petition, and retaliate against a party for exercise of her civil rights, no matter how repugnant my religious beliefs may be, free will is more important than order and control, bending people's will making society less rich with truth and the free flow of diverse ideas, debate allows, by wrongfully bringing proceedings in violation of federal law as applied to me

State courts are unable to afford me relief to enjoin the wrongful proceedings against me since members of the Chancery Court and the Delaware Supreme Court likely participated in misconduct by making complaints to Defendants or to agents who made complaints to Defendants. Members of the Delaware Supreme Court were aware of the information DE-Lapp and Defendants refer are the reasons for their wrongful disciplinary proceeding against me. (D.I.).

The Court cannot clean Defendants' hands because its own hands are dirty by involvement in conspiracy to interfere, harass, or pressure me to forgo my case, and in conduct retaliating against me motivated by their disdain for my religious beliefs manifested in speech in the petitions. I would be prejudiced in state court, and have a right to bring my federal claims in this federal court. I must be afforded opportunity to plead my case to prevent injustice, by the elimination of access to the only court able to afford me relief. The Chancery Court is the state court with jurisdiction to grant equity and

injunctive relief. The Delaware Supreme Court, which has no jurisdiction to enjoin the Defendants pending a determination of my federal claims, only this Court has jurisdiction, without manifest prejudice and clear error of the law under the facts in the pleadings the court failed to consider. I would be prejudiced by elimination of my First amendment rights with no recourse in the proceedings below as members of the Delaware Supreme Court and Chancery Court appeared to participate in retaliation against me and the institution of the unconstitutional proceedings against me.

My letter to the Delaware Supreme Court, which may have been reviewed by all members of the Delaware Supreme Court is the reason why DE-Lapp alleged they instituted proceedings to investigating me under the guise of offering help, since I paid my active attorney dues, possibly to cover up the letters I petitioned to Master Griffin. Thereafter, Defendants received Delaware Supreme Court filings, and allege this is the reason they seek disciplinary proceedings. How did they get them? Not through the unserved Defendants, but likely through the members of the Court or through their agents.

The prosecutor must not be the judge in my claims for relief for Defendants' retaliation against me for the exercise of my protected rights, and for interference with my case, Kelly v Trump. I do not ask this court to conduct a disciplinary proceeding, merely to determine whether the Defendants conduct alleged in my complaint, and the proceeding itself are violations of the laws I alleged in my complaint, to prevent the persecution against me by government agents, and the precedent endangering others of loss of protected freedoms by government agents. I should like to add nominal damages too.

The Defendants and Court agents by their positions are not above the Constitutional law, allowing them to suppress, obstruct and punish me for the exercise of my First amendment rights merely by the use of the color of law to discriminate and persecute me based on my faith in Jesus. I do not lose my right to seek relief in Court for Defendants' violations of the Constitutional law and federal laws in exchange for my license to practice law or by the institution of proceedings against me. Defendants knew or should have known their conduct violated federal law, even if I am poor and unemployed. I am not deemed less worthy of protections under the law by mere poverty, but am equal to those of great

wealth under the constitution. Judges and arms of the court are not above the Constitution and must be limited to adhere to the Constitution by outside courts should they overstep.

I did not sell my soul to hell for my license to practice law, nor did I become enslaved to the false God of money in exchange for my license to practice law. Any sacrifice of religious freedoms of conscience for the profit and control under the guise of order of the profession, even at the cost of human sacrifice of individual Constitutional liberties, is a sacrifice too great. I am protected under the Constitution for my religious beliefs, religious exercise, speech, petitions and association, even if I am in destitute utter poverty, an attorney, and even if Defendants find my religious associated beliefs, speech and petitions, which reflect my religious exercise and beliefs, repugnant or crazy. I am protected even if I made mistakes in court, in my desperate desire to serve Jesus by protecting God's holy name. Defendants are not immune for conduct they knew or should have known as attorneys were Constitutional violations. Immunity is removed. *Werkheiser v. Pocono Twp.*, 780 F.3d 172, 176 (3d Cir. 2015), I.D 2 at 188, 194, 201-204, 236-239, 336,

My faith in God the father, Jesus, and the holy spirit are in issue in this case, my complaint *Kelly v Trump* relating to a substantial burden upon my free exercise of religion, and are in issue, as the motive, an improper motive for Defendants' case Board Case No. 115327-B per Defendants admission per the attached complaint marked as (Exhibit 1. at 7), and per my Complaint, motions and exhibits. (D.I. 1-12, 14) Defendants bring a wrongful proceeding against me because they find my religious beliefs in Jesus, "a serious concern regarding my mental capacity." *Id.* They allege they do not understand my beliefs in Jesus "are objectively illogical; and rely on non-legal sources, including the Bible." See, *Africa v. Pennsylvania*, 662 F.2d 1025, 1025 (3d Cir.) ("Judges are not oracles of theological verity, and the founders did not intend for them to be declarants of religious orthodoxy."); *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 682. ("Courts have no business addressing whether sincerely held religious beliefs asserted in a RFRA case are reasonable.") (Defendants' wrongful action against me relate

to my pleadings in RFRA action **Kelly v Trump**); *Employment Div., Dept. of Human Resources of Ore. v. Smith*, 494 U. S. 872, 887, (“Repeatedly and in many different contexts, we have warned that courts must not presume to determine the place of a particular belief in a religion or the **plausibility of a religious claim.**”); *Presbyterian Church in U. S. v. Mary Elizabeth Blue Hull Memorial Presbyterian Church*, 393 U. S. 440, 450 (1969); *Ben-Levi v. Brown*, 136 S. Ct. 930, 934, See, *Holt v. Hobbs*, 574 U.S. 352, 352. I am not required to make what is clear to me, clear to Defendants or the Courts. The Courts must merely believe my faith and beliefs are genuine, a fact to me, as alleged. They do not have to agree with my religious beliefs, merely believe I believe God as I pled, as a fact to me. (emphasis intended).

Defendants also seek to appoint counsel for me, at my expense, when I am impoverished, and going into debt is against my religious beliefs, and appointed counsel is against my religious beliefs, as I believe God is my advocate in the disciplinary case. (D.I. 10, regarding debt violates my religious beliefs). I must stand or fall on my faith. I will allow the holy spirit to be my advocate. An attorney advocate cannot adequately represent my religious beliefs. (**Exhibit 2**). My faith in Jesus does not make me disabled, even if Defendants deem it irrational, including my religious opposition to mental and physical health examinations and care as stated in my complaint. D.I. 2.

My poverty, while a disadvantage to me, does not make me disabled. Even the poor are afforded protection for the exercise of their First amendment rights. Our fundamental freedoms are not free if they are for sale to only those who can afford to pay to exercise civil rights. The Court erred in failing to consider the loss to the public of their loss of first amendment rights as they are in danger of being labeled as disabled for merely exercising federal rights, making the

government above the Constitution and the rule of law, and the poor and those with diverse beliefs below the law.

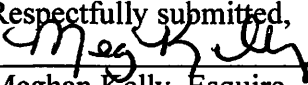
The Court erred in failing to address the loss to the public of my speech, association, potential representation, affiliation and ideas. My complaint intentionally refers to ideas to prevent an economic crash, prevent the elimination of social security, improve healthcare and other important issues beneficial to the public. D.I. 1-19. My speech would be diminished should Defendants be permitted to label me disabled but for my religious beliefs in Jesus. The Court did not examine the facts or legal arguments pled in my complaint. or the motions, and exhibits thereto incorporated therein, for a preliminary injunction, temporary restraining order and waiver of bond, and other motions. Id. (D.I. 1-9).

With regards to whether Younger should apply, “The pertinent inquiry is whether the state proceedings afford an adequate opportunity to raise the constitutional claims.” *Middlesex Ethics Comm. v. Garden State Bar Assn*, 457 U.S. 423, 424 (1982). In my case there is no fair opportunity to raise constitutional claims in state court. Constitutional claims may be brought as a defense, illegality, not as a counterclaim in state court. This Court is the only venue that may afford me relief. Younger does not apply, even if it did exceptions apply. The prosecution is brought in bad faith to persecute me based on my religious beliefs reflected in my speech and petitions, and disdain towards me due to poverty. They prosecute an innocent party, not practicing law, defending my right to worship Jesus in *Kelly v Trump* without government persecution, only for Defendants to persecute me. The proceeding brought under color of law, as applied is utterly unconstitutional brought in violation of my first amendment right to exercise religion motivated to punish me for my beliefs in Jesus. Defendants bring the disciplinary proceeding to harass, humiliate, demean my speech in the public’s eyes and cause me emotional

distress, based on disdain for my religious beliefs, speech, petitions, poverty and, or association, as an impoverished unemployed attorney, acting as a party to protect something more valuable than money, freedom to worship God. Even if the state proceeding continues, this case cannot be dismissed and I must be afforded access to the courts in the only court that may afford relief to protect something more important than my license, my ability to worship God without government persecution.

Wherefore, the Court must grant this order to prevent manifest injustice or to correct clear error. (Exhibit 5)

Dated November 8 2021

Respectfully submitted,

Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
Unrepresented indigent party,
Bar No. 4968 (Word 3,541 Count)

I declare, affirm that the foregoing statement is true and correct under the
penalty of perjury, dated Nov. 8, 2021

Meghan Kelly (printed)

Meg Kelly (signed)

Exhibit 8

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

Plaintiff's Amended Motion for Reargument

Plaintiff Meghan Kelly, pro se, brings this motion for reargument pursuant to FRCP Rule 59(e), and D. Del. 7.1.5 (a), on the order (D.I 17) in objection to and request to vacate each and every one of the court's findings denying my motions to expedite, for a temporary restraining order, a preliminary restraining order, exemption from bond, for emergency relief, motion to appear remotely, motion to electronically file, with a waiver of electronic filing fees, abstention under the *Younger* and the dismissal of this case, based on supremacy of federal law, the absence of opportunity for relief in state courts, essentially eliminating my ability to protect my fundamental rights through access to the courts in exchange for my license to practice law, sacrificing individual liberties including my religious exercise, speech, association and petitioning the court for relief against disparate treatment towards me by government agents motivated by their disagreement with my religious exercise, petitions, poverty, association and or speech. (D.I. 1-19).

The Court erred as a matter of law by denying all of my motions and dismissing my case per the arguments and facts stated therein. I face irreparable injury that cannot be addressed or prevented in state court, only this court has jurisdiction to grant relief, under the facts of this case. The Court must consider my pleadings before dismissing my arguments, which cannot be brought in other courts as claims.

I also seek to vacate the Order because the Court erred as a matter of law by disregarding all my pled facts, pled legal arguments, ~~not limited to Defendants' conduct, and the conduct through its~~ ~~coconspirators, or agents De Lapp and Judge Clark, a Court of Common Pleas, in violation of federal law,~~

where I am a party for my exercise of federal rights, and by initiating a proceeding, under the color of the law, in violation of the Constitution and federal law, as applied against me, a party of one, under the pleadings in my complaint, and exhibits incorporated therein by reference, and in the motions, and exhibits thereto, motivated by their disdain for my religious beliefs reflected in my speech, petitions and association. Id. Judge Clark sought to intimate me with the cloak of his Court authority related to and with intent to interfere with my exercise of First amendment rights. The Court abused discretion by disregarding the facts and legal arguments I pleaded in the complaint and motions, and by making no determination on such arguments considering the immediate irreparable injury I continue to face. ~~DI-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 misled me into almost missing my filing date to appeal Kelly Trump, and instructed me to cross off the Delaware lawyer's address in the praecipe to prevent service to local counsel. The Court abused discretion by disregarding the facts and legal arguments I pleaded, and by making no determination on such arguments. The Court made an error of apprehension. Id. Even on a Motion to dismiss the Court is required to consider "whether the allegations on the face of the complaint, taken as true, allege facts sufficient to invoke the jurisdiction of the district court." *Licata v. U.S. Postal Serv.*, 33 F.3d 259, 260 (3d Cir. 1994). The Court abused its discretion by ignoring, failing to address all the facts and pleadings in my complaint and motions before dismissing a case, related to fundamental rights requiring strict scrutiny to be upheld. Defendants face no irreparable harm. I am not working and have not represented anyone but myself, as an attorney in years, and will not represent anyone anytime soon. I sought to make a difference differently by attempting to revise the laws over the years. I believe religion and state must be separate. People should worship or not according to the dictates of their conscience, not the dictates of the government through their partners, including religious entities. When my religious liberties were at stake,

I gave up public office aspirations for God, in hopes the Courts would safeguard our religious freedoms. ~~Younger does not apply.~~

I am not asking the Court to make a disciplinary determination. I am asking the Court to, *inter alias*, (1) enjoin the Disciplinary Proceedings until a determination is made, leaving time for appeals to determine whether the conduct by the defendants violated the first amendment applicable to defendants pursuant to the fourteenth amendment concerning my free exercise of religion, speech, association, and petitioning the government to address grievances, 42 USC §§ 1985(2), 1983 ("federal law"), and (2) determine whether the proceedings themselves are a violation of federal law. (D.I. 1, 2, 3, 4, 9, 10, 7, 8, 6, 12, 11, 14.) (1) The conduct by Defendants and the coconspirators as pled are a violation of federal law, and (2) the proceedings themselves are a violation of federal law. (D.I. 1-19). ~~I asked the Court for a preliminary injunction, a temporary restraining order, and waiver of bond to prevent the suppression of my right to petition to safeguard my civil rights due to destitute and inability to pay to prevent waiver of my First Amendment rights based on inability to pay. I did not ask the court to conduct a disciplinary trial. My complaint asks for additional relief, and alleged additional harm beyond injunctive relief, including but not limited to damages, physical harm, humiliation, emotional distress, harm to my life, safety, livelihood, and other relief from harm the Court did not address. Injunctive relief while the main relief, is not the only relief I requested. I would also like to include nominal relief, as the violation of my First Amendment rights are more important to protect than money or my license, though I seek to protect my license and ability to find work too. (D.I. 2, 3, 4). Uzuegbunam did not ask the court to conduct a disciplinary trial.~~

The Court abused its discretion by ignoring the laws, facts and analysis in my pleadings and motions. The Court abused its discretion by failing to grant me relief in my motions, disregarding all facts and legal arguments. Injunctive relief while the main relief, is not the only relief I requested. ~~↔~~ *Prezewski*, 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 "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 Court erred by ignoring the Chancery Court's staff's and Delaware Supreme Court Chief Justice' apparent participation in the retaliation, and intentional interference to obstruct, harass, interfere, or pressure me to forgo my case, Kelly v Trump, by instigating DE-Lapp and ODC proceedings against me motivated by their disdain for my personal, religious affiliated beliefs, speech reflected the same, exercise of my right to petition, poverty, association and religious exercise, and as this case may bar me from rearguing Defendants' in violations of 42 USC Sections 1983, and 1985(2), and First Amendment

violations applicable to Defendants pursuant to the Fourteenth amendment before the Delaware Supreme Court, should a negative holding against me be found. (D.I. 1-D.I 17).

The evidence shows the Delaware Supreme Court justices partook in the federal law violations. The Defendants and DE-Lapp and coconspirators allege they brought the complaint due to petitions I filed with the Delaware Supreme Court. (D.I. 3, and D.I. 10, D.I. 8, De-Lapp Letter and A-4, A-5). Only the Delaware Supreme court judges knew of my petition to suspend lawyer fees for all unemployed lawyers due to the pandemic, albeit Mark Vavala knew too. Only DE Justices knew of my pleadings as no party responded. The source of the wrongful complaint against me brought to interfere and punish me for my exercise of fundamental rights and belief in Jesus appears to be rooted in the DE Supreme Court's instigation who will be complainant, judge and jury against me in a proceeding brought in retaliation and interference of my exercise of civil rights, motivated by their desire to suppress my religious associated beliefs. It is injustice guaranteed as the Supreme Court appears to have ~~partook~~partaken in federal law violations against me.

It would be improper for me to name the Court as a party since I had a case before them, but it appears the Court ~~seeks~~may seek to sue me, and I no longer have a case before them. They may interplead if they so desire instead of wasting resources, although I prefer not to sue the court, only to protect my fundamental rights, especially to exercise my faith in Jesus. (Exhibit 3).

The Court erred as a matter of law by indicating I could receive relief in state court, where no relief is afforded as the Chancery Court and Supreme Court participated in the facts that are the subject of this dispute, forcing Procedural and Due process violations and eliminating my access to the only court who may afford me relief, the District Court. Defendant is the initial judge, while I can argue illegality as a defense, Defendant and the coconspirator Court would wrongly grant immunity to any action I would have brought in state court, giving themselves power to be above the law and Constitution as the courts participated in the conduct which is the cause of this action. "Congress, the Executive, and the Judiciary all have a duty to support and defend the Constitution." *Salazar v. Buono*, 559 U.S. 700, 717 (2010).

The conduct by the Chancery and Delaware Supreme Court are the subject matter of this dispute, sabotaging my case by attempting to mislead me to miss my deadline, directing me to cross off DE lawyer's address to prevent service, petitions, and other activity. I petitioned the Chancery Court concerning disparate treatment against me, a party of one, and suppression of my First Amendment liberties by members of the Chancery Court, in addition to members of the Government by filing complaints in the Chancery Court against the Department of Elections and against Presidents Trump and Biden for their requirement I sacrifice my exercise in religious beliefs or other First amendment rights in exchange for the exercise of other rights. (D.I. 4, Exhibits A-4, A-5, 2, 5, and Appendix G), (D.I. 3 at Exhibits 12, 11, 17.) The Supreme Court justice, Judge Clark, and Chancery Court staff are expected to be witnesses to this case. See Exhibit 4. I petitioned the Delaware Supreme Court concerning government agents, acting under the color of law pressuring me to forgo Constitutional rights, with intent or to interfere, punish retaliate, substantially burden and obstruct my exercise of protected rights, motivated by their desire to suppress the exercise of my protected religious exercise, speech, petitions and association, in violation of federal law. 42 USC 1985(2), 1983, USC Section 1. (D.I.3, Exhibits 11, 12, 13.). The authority vested in Defendants under color of state law to conduct investigations and disciplinary proceedings for attorney misconduct do not permit the Defendants to knowingly violate the Constitution and federal laws including Conspiracy to harass, interfere or pressure a party, me, to forgo my case, motivated by their disdain to my poverty, association, religious exercise and beliefs manifesting in my speech and petition, and retaliate against a party for exercise of her civil rights, no matter how repugnant my religious beliefs may be, free will is more important than order and control, bending people's will making society less rich with truth and the free flow of diverse ideas, debate allows, by wrongfully bringing proceedings in violation of federal law as applied to me

State courts are unable to afford me relief to enjoin the wrongful proceedings against me since members of the Chancery Court and the Delaware Supreme Court likely participated in misconduct by making complaints to Defendants or to agents who made complaints to Defendants. Members of the

Delaware Supreme Court were aware of the information DE-Lapp and Defendants refer are the reasons for their wrongful disciplinary proceeding against me. (D.I.).

The Court cannot clean Defendants' hands because its own hands are dirty by involvement in conspiracy to interfere, harass, or pressure me to forgo my case, and in conduct retaliating against me motivated by their disdain for my religious beliefs manifested in speech in the petitions. I would be prejudiced in state court, and have a right to bring my federal claims in this federal court. I must be afforded opportunity to plead my case to prevent injustice, by the elimination of access to the only court able to afford me relief. The Chancery Court is the state court with jurisdiction to grant equity and injunctive relief. The Delaware Supreme Court, which has no jurisdiction to enjoin the Defendants pending a determination of my federal claims, only this Court has jurisdiction, without manifest prejudice and clear error of the law under the facts in the pleadings the court failed to consider. I would be prejudiced by elimination of my First amendment rights with no recourse in the proceedings below as members of the Delaware Supreme Court and Chancery Court appeared to participate in retaliation against me and the institution of the unconstitutional proceedings against me.

My letter to the Delaware Supreme Court, which may have been reviewed by all members of the Delaware Supreme Court is the reason why DE-Lapp alleged they instituted proceedings to investigate me under the guise of offering help, since ~~all fees were~~ I paid my active attorney dues, possibly to cover up the letters I petitioned to Master Griffin. Thereafter, Defendants received Delaware Supreme Court filings, and allege this is the reason they seek disciplinary proceedings. How did they get them? Not through the unserved Defendants, but likely through the members of the Court or through their agents.

The prosecutor must not be the judge in my claims for relief for Defendants' retaliation against me for the exercise of my protected rights, and for interference with my case, Kelly v Trump. I do not ask this court to conduct a disciplinary proceeding, merely to determine whether the Defendants conduct alleged in my complaint, and the proceeding itself are violations of the laws I alleged in my complaint, to prevent the persecution against me by government agents, and the precedent endangering others of loss of protected freedoms by government agents. I should like to add nominal damages too.

The Defendants and Court agents by their positions are not above the Constitutional law, allowing them to suppress, obstruct and punish me for the exercise of my First amendment rights merely by the use of the color of law to discriminate and persecute me based on my faith in Jesus. I do not lose my right to seek relief in Court for Defendants' violations of the Constitutional law and federal laws in exchange for my license to practice law or by the institution of proceedings against me. Defendants knew or should have known their conduct violated federal law, even if I am poor and unemployed. I am not deemed less worthy of protections under the law by mere poverty, but am equal to those of great wealth under the constitution. Judges and arms of the court are not above the Constitution and must be limited to adhere to the Constitution by outside courts should they overstep.

I did not sell my soul to hell for my license to practice law, nor did I become enslaved to the false God of money in exchange for my license to practice law. Any sacrifice of religious freedoms of conscience for the profit and control under the guise of order of the profession, even at the cost of human sacrifice of individual Constitutional liberties, is a sacrifice too great. I am protected under the Constitution for my religious beliefs, religious exercise, speech, petitions and association, even if I am in destitute utter poverty, an attorney, and even if Defendants find my religious associated beliefs, speech and petitions, which reflect my religious exercise and beliefs, repugnant or crazy. I am protected even if I made mistakes in court, in my desperate desire to serve Jesus by protecting God's holy name. Defendants are not immune for conduct they knew or should have known as attorneys were Constitutional violations. Immunity is removed. *Werkheiser v. Pocono Twp.*, 780 F.3d 172, 176 (3d Cir. 2015), I.D 2 at 188, 194, 201-204, 236-239, 336.

My faith in God the father, Jesus, and the holy spirit are in issue in this case, my complaint *Kelly v Trump* relating to a substantial burden upon my free exercise of religion, and are in issue, as the motive, an improper motive for Defendants' case Board Case No. 115327-B per Defendants admission per the attached complaint marked as (Exhibit 1. at 7), and per my Complaint, motions and exhibits. (D.I. 1-12, 14) Defendants bring a wrongful proceeding against

me because they find my religious beliefs in Jesus, “a serious concern regarding my mental capacity.” Id. They allege they do not understand my beliefs in Jesus “are objectively illogical; and rely on non-legal sources, including the Bible.” See, *Africa v. Pennsylvania*, 662 F.2d 1025, 1025 (3d Cir.) (“Judges are not oracles of theological verity, and the founders did not intend for them to be declarants of religious orthodoxy.”); *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 682. (“Courts have no business addressing whether **sincerely held religious beliefs asserted in a RFRA case are reasonable.**”) (**Defendants’ wrongful action against me relate to my pleadings in RFRA action Kelly v Trump**); *Employment Div., Dept. of Human Resources of Ore. v. Smith*, 494 U. S. 872, 887, (“Repeatedly and in many different contexts, we have warned that courts must not presume to determine the place of a particular belief in a religion or the **plausibility of a religious claim.**”); *Presbyterian Church in U. S. v. Mary Elizabeth Blue Hull Memorial Presbyterian Church*, 393 U. S. 440, 450 (1969); *Ben-Levi v. Brown*, 136 S. Ct. 930, 934. See, *Holt v. Hobbs*, 574 U.S. 352, 352. I am not required to make what is clear to me, clear to Defendants or the Courts. The Courts must merely believe my faith and beliefs are genuine, a fact to me, as alleged. They do not have to agree with my religious beliefs, merely believe I believe God as I pled, as a fact to me. (emphasis intended).

Defendants also seek to appoint counsel for me, at my expense, when I am impoverished, and going into debt is against my religious beliefs, and appointed counsel is against my religious beliefs, as I believe God is my advocate in the disciplinary case. (D.I. 10, regarding debt violates my religious beliefs). I must stand or fall on my faith. I will allow the holy spirit to be my advocate. An attorney advocate cannot adequately represent my religious beliefs. (**Exhibit 2**). My faith in Jesus does not make me disabled, even if Defendants deem it irrational, including my

religious opposition to mental and physical health examinations and care as stated in my complaint. D.I. 2.

My poverty, while a disadvantage to me, does not make me disabled. Even the poor are afforded protection for the exercise of their First amendment rights. Our fundamental freedoms are not free if they are for sale to only those who can afford to pay to exercise civil rights. The Court erred in failing to consider the loss to the public of their loss of first amendment rights as they are in danger of being labeled as disabled for merely exercising federal rights, making the government above the Constitution and the rule of law, and the poor and those with diverse beliefs below the law.

The Court erred in failing to address the loss to the public of my speech, association, potential representation, affiliation and ideas. My complaint intentionally refers to ideas to prevent an economic crash, prevent the elimination of social security, improve healthcare and other important issues beneficial to the public. D.I. 1-19. My speech would be diminished should Defendants be permitted to label me disabled but for my religious beliefs in Jesus. The Court did not examine the facts or legal arguments pled in my complaint, or the motions, and exhibits thereto incorporated therein, for a preliminary injunction, temporary restraining order and waiver of bond, and other motions. Id. (D.I. 1-9).

With regards to whether Younger should apply, "The pertinent inquiry is whether the state proceedings afford an adequate opportunity to raise the constitutional claims." Middlesex Ethics Comm. v. Garden State Bar Assn, 457 U.S. 423, 424 (1982). In my case there is no fair opportunity to raise constitutional claims in state court. Constitutional claims may be brought as a defense, illegality, not as a counterclaim in state court. This Court is the only venue that may afford me relief. Younger does not apply, even if it did exceptions apply. The prosecution is

brought in bad faith to persecute me based on my religious beliefs reflected in my speech and petitions, and disdain towards me due to poverty. They prosecute an innocent party, not practicing law, defending my right to worship Jesus in Kelly v Trump without government persecution, only for Defendants to persecute me. The proceeding brought under color of law, as applied is utterly unconstitutional brought in violation of my first amendment right to exercise religion motivated to punish me for my beliefs in Jesus. Defendants bring the disciplinary proceeding to harass, humiliate, demean my speech in the public's eyes and cause me emotional distress, based on disdain for my religious beliefs, speech, petitions, poverty and, or association, as an impoverished unemployed attorney, acting as a party to protect something more valuable than money, freedom to worship God. Even if the state proceeding continues, this case cannot be dismissed and I must be afforded access to the courts in the only court that may afford relief to protect something more important than my license, my ability to worship God without government persecution.

Wherefore, the Court must grant this order to prevent manifest injustice or to correct clear error. (Exhibit 5)

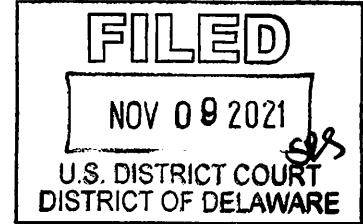
Dated November 2021

Respectfully submitted,

Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
Unrepresented indigent party,
Bar No. 4968 (Word 3,631 Count 541 Count)

UNITED STATES DISTRICT COURT IN THE DISTRICT OF
DELAWARE

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



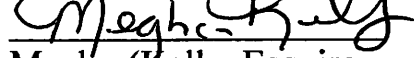
CERTIFICATE OF SERVICE OF PLAINTIFF'S MOTION TO AMEND
MOTION FOR REAGUMENT

I, Meghan M. Kelly, Esquire, hereby certify that on this ⁹ day of November, 2021, had a true and correct copy of the foregoing, motion to amend motion for reargument, dated November ⁸, 2021 sent to all Defendants through their attorney, per their counsel's request, including Defendants Disciplinary Counsel Patricia B. Swartz, Chief Disciplinary Counsel, David A. White, Disciplinary, Counsel Kathleen M. Vavala, Office, the Office of Disciplinary Counsel, Board of Professional Responsibility for the Supreme Court of Delaware, the Preliminary Investigatory Committee, and Defendant Delaware Attorney General Kathleen Jennings, in her capacity as the Attorney General for the State of Delaware at

Delaware Attorney General Kathleen Jennings
 Delaware Department of Justice
 Carvel State Building 820 N. French St.

Wilmington, DE 19801, served via first class mail:

Respectfully submitted,



Meghan Kelly, Esquire

DE Bar Number 4968

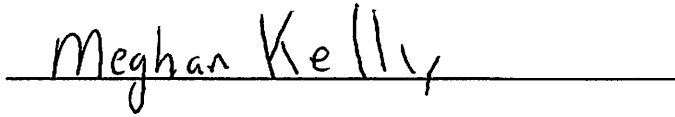
34012 Shawnee Drive

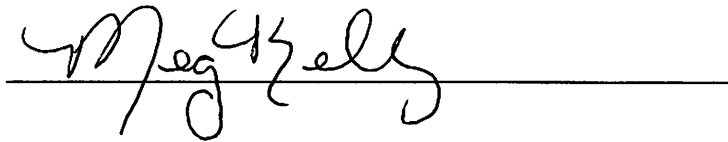
Dagsboro, DE 19939

meghankellyesq@yahoo.com

Acting as unrepresented indigent
party, unrepresented by counsel

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



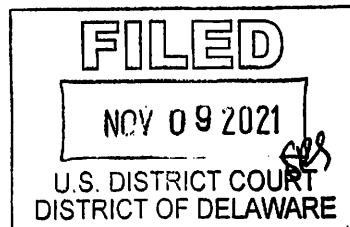


Nov 8, 2021

I declare, affirm that the foregoing statement is true and correct under the
penalty of perjury, dated *Nov. 8, 2021*

Meghan Kelly (printed)

Meg Kelly (signed)



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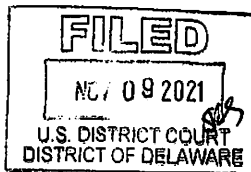
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States District Court
844 N. King St. Unit 18
Wilm, DE 19801

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF’S MOTION TO AMEND FINDINGS OF FACTS AND ALTER THE ORDER, DATED DECEMBER 22, 2021, BASED ON NEW FINDINGS OF FACT, TO PREVENT, CLEAR ERROR OF FACTS, CLEAR ERROR OF LAW, AND TO PREVENT MANIFEST INJUSTICE

Plaintiff, Meghan M. Kelly, pro se, this 1/11/22, pursuant to FRCP R. 52(b), and 59 (e) moves this Court to alter and amend the judgment of the Court in its December 22, 2021 order to (1) include the availability of new evidence not available previously available, and to later the order (2) to correct a clear error of law, (3) clear error of fact, (4) and to prevent manifest injustice.¹

I am getting sued by the government for my faith in Jesus Christ. Defendants appear to think my worship of God instead of money and material gain is a mental disability. Jesus says you cannot serve God and money. (D.I. 20, 21). I believe people go to hell for organized charity, pro bono, fundraising, forcing individuals to work as discipline in violation of the 13th Amend., and **blindly** doing what they are told at a job for money to care for their family, while not caring to **see clearly to love God** as God, instead of money as savior and God, and not caring to **see clearly to love others**, by understanding how their product or service may harm others God

¹ See eg. the following for standard of review, *United States v. Fiorelli*, 337 F.3d 282, 288 (3d Cir. 2003); *Max’s Seafood Cafe ex rel. Lou-Ann, Inc. v. Quinteros*, 176 F.3d 669, 677 (3d Cir. 1999); *Harsco Corp. v. Zlotnicki*, 779 F.2d 906, 909 (3d Cir. 1985).

loves.² I believe experts are rendered above the law by adherence to controlled conformity across the board which stifles improvements by freedom of thought and speech, hindered by libel laws, and defense of adherence to professional standards, delegation of duties or ignorance. I believe, fundraising, donations and government funding controls and limits what alleged experts learn, to serve lawless business greed not good, untamed by the rule of law or God's law of love. Our libel laws prevent free speech, debate and criticism to serve business greed. (D.I.4 at Ex 54 to F). Defendants allege my belief in Jesus Christ is illogical, and compel me to conform to the world, when I am commanded to be set apart, holy, or risk losing my ability to "buy and sell" by taking my license to work as an attorney.³

The trial against me is scheduled Thursday, Jan 13, 2022, days away, despite the fact I did not receive proper notice, moved to postpone the hearing, and requested an opportunity to conduct discovery to show the cause of action is illegal and to show the state does not have subject matter jurisdiction against me.

On Oct. 25, 2021, I filed a Complaint, and various motions with the District Court based on the arm's of the Delaware Supreme Court and its agents' or coconspirators interference with *Kelly v Trump* and retaliation against me for my exercise of Constitutionally protected activity under 42§§§ 1985(2), 1983, and 1988, including retaliation against me by seeking to disbar me for petitioning the Courts to remove a substantial burden upon my free exercise of religion under RFRA against the President for the establishment of government religion, established by *inter*

² See, D.I. US Ex., App E, Ex A-4, A-5, App. F, Ex. A, 1-8, 43, 46, 48, 50, 51, to App F, App H (Emphasis intended, See, *Jn.* 12:40, *Lk.* 11:34)

³ *Rev.* 13:17, *Ro.* 12:2, *Nu.* 23:9, *Heb* 12:14. Work is not the sin. When your desire for money drives out your love for God and one another, at the cost of human sacrifice, harming others to serve greed, that is sin. The Free exercise Clause permits me to worship or not according to the dictates of my conscience no matter how unreasonable my religious beliefs may be to the state, not the forced worship of business greed, money and material gain by barter or exchange.

alias executive orders that join the state and religion by partnerships through pay through barter or exchange under the deception of charity to perform government-religious business, and two petitions relating to my request for relief on attorney license dues. ⁴ I sued the President to abolish executive orders that pay churches to perform government business under the guise of charity. It is business, not unconditional charitable love. This is a step to eliminate governments' function of welfare, eliminating social security and other government welfare programs, allowing lawless greed to reign by entities without hearts who have no power to do good, as individual humans may through unconditional love.⁵ These entities, will not be tamed with just laws or the law of love written on the hearts of man, should the Courts not prevent or reverse the global schemes. I read the plans the *Fourth Industrial Revolution* and the *Great Reset*. (D.I. 9 at Ex. 6, 8, 9). There is a plan through unjust policies to eliminate private property and make everything and everyone no longer free, but for sale to be rented out. *Id.* Schemes may be undone by the Courts before the courts governing power is eliminated by design through privatization and automation. The Court is my hope of a hero.

On Nov. 2, 2021, this Court entered an order without considering, analyzing or providing a legal opinion on all of the relevant facts and legal arguments pleaded to *inter alias* dismiss the Case as an improper forum to determine whether the state case against me is illegal, and dismissing all motions on November 2, 2021, reaffirming such dismissal on December 2, 2021. This court cited Defendant's 8/23/2021 letter referring to both Chancery and Delaware Supreme Court pleadings as their basis to investigate me in interference with my active case, pending

⁴ (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).

⁵ (D.I. 2, D.I. 3, D.I. 4, at Ex A and Ex 2 of Ex F).

before the US Supreme Court at the time. (D.I. 16, D.I. 9 at Ex. 5) (Ex. A). This Court overlooked the Defendant's reference to the **Delaware Supreme Court's pleadings** as the asserted reason Defendants interfered with my active case, and retaliate against me for exercising protective activity, and evidence of the Delaware Supreme Court's participation in retaliation against me for the exercise of fundamental rights.⁶ The Delaware Supreme Court is an improper forum to determine whether the Defendants conduct against me is unlawful as a matter of law under the procedural and substantive Due process clause pursuant to the state actors and entities via the 14th Amend. and under 42 USC §§§ 1985(2), 1983, and 1988, the Equal Protections Clause for disparate treatment, and the 1st Amend. applicable to the state via the 14th Amend., and arguably 28 U.S.C.A. 605, and analyzing a full and fair opportunity to be heard by considering the analysis of (28 USCS §§ 455 (b)(1), 455(b)(5)(iv)).⁷

⁶ (emphasis intended); (D.I. 3, Ex 13 Jan 7 petition relating to attorney fees); (D.I. 4, US Ex App B, Ex A-4, A-5, Ex A of Ex. F, referring to the complaint and two motions relating to second petition relating to attorney fees, App E and F, Briefs).

⁷ See, *Davis v. Jones*, 506 F.3d 1325, 1330 (11th Cir. 2007) indicates this statute only applies to the **federal courts, not state courts**. The statutes analysis is useful in a procedural due process analysis regarding impartiality and a fair trial, as applied to me. The Third Circuit in *Johnson v. Carroll*, 369 F.3d 253, 259 (3d Cir. 2004) indicates, "28 U.S.C. § 455 [is for federal judges] and not on direct precedent related to the [state] trial judge's appearance of bias." This is distinguished from my case since it dealt with Section 455(a), not section 455(b)(1) and (5)(iv) as I plead. Appearance is not enough for the Third Circuit which is praise worthy because the individual justices are concerned with actual justice, under the facts, not the marketing or popularity of justice as a business).

See, *Johnson v. Carroll*, 369 F.3d 253, 259-60 (3d Cir. 2004)

"The Supreme Court held in *In re Murchison*, 349 U.S. 133, 75 S.Ct. 623, 99 L.Ed. 942 (1955), that it was unconstitutional for the same state judge, after a full hearing in open court, to punish contempt, previously committed before him while acting as a one-man "judge-grand jury" permitted under then Michigan laws. "It would be very strange if our system of law permitted a judge to act as grand jury and then try the very persons accused as a result of his investigations." 349 U.S. at 137, 75 S.Ct. 623. The Court concluded that "no man can be a judge in his own case and no man is permitted to try cases where he has an interest in the outcome." *Id.* at 136, 75 S.Ct. 623. That conclusion was based on "the basic requirement of due process" that the defendant receive "[a] fair trial in a fair tribunal." *Id.* The Court commented that although fairness certainly required "an absence of actual bias," "our system of law has always endeavored to prevent even

The District Court erred as a matter of law, in violation of the procedural and substantive Due Process Clause, the 1st Amend. and Equal Protections component of the 5th Amend. based on disparate treatment relating to religious political affiliation or pro se, in forma pauperis status, by failing to provide me with the opportunity to be heard and disregarding the clear evidence which shows the Delaware Supreme Court is an improper forum to grant damages for infliction of emotional distress, injunction or nominal damages and other relief, relating to conduct its members or agents, since the state court participated in or incited the conduct which is the subject of this dispute.

The Court also overlooked the facts indicating the Delaware Supreme Court incited or participated in the conduct in interference of and in retaliation of my exercise of Constitutionally protected conduct which is the subject of this dispute, and cannot be the judge of its own relevant conduct or participation relating to this matter, where I am not only seeking equitable relief, but I sought damages for emotional distress.⁸ I believe I developed the shingles as a result of this case on or around January 3, 2021 too.⁹

the probability of unfairness." *Id.* The Court acknowledged that its "stringent rule may sometimes bar trial by judges who have no actual bias and who would do their very best to weigh the scales of justice equally between contending parties." *Id.* However, "to perform its high function in the best way justice must satisfy the appearance of justice." *Id.* (internal quotation marks omitted).

⁸ (D.I. 2, at pages 8-9, 12-13, 48-52, 59, 68, 70, 71-74, 101,103); (Ex. B attached, Ex. B 2, attached, evidence of harassment to intentional increase emotional distress); (DI. 3 at Ex 1, 2, 3); (D.I. 20, D.I. 21 at Ex. 2, please note I was trembling at the forced violation of my religious belief that a police officer made a wellness check, per D.I. 21. Also note the pleadings relating to the physical threats to my safety based on political-religious association or speech at D.I. 1, D.I. 4, at US Ex. A-4, A-5, US petition of writ of cert, US-Ex. 52, not attached).

⁹ D.I. 2 page 103. I would also like to include nominal damages, to protect fundamental rights including the right to worship or not according to the dictates of our own conscience, not the dictates of the government. Since this right is more important than money, and is not something money can remedy. Freedom is not for sale by barter or exchange.

The entire Supreme Court may have reviewed my request to suspend active attorney license registration fees for lawyers facing economic hardship during the pandemic, and my second request for relief relating to attorney license registration fees. De-Lapp, an arm of the court, claimed their interference with my active case, was because I petitioned the Court for relief from attorney dues.¹⁰ De-Lapp, an agent of Defendants, was not going to help me. (Ex. C). I already paid the fees. They sought to gather evidence against me, to punish me for my exercise of fundamental rights, including the right to petition the court regarding attorney dues. It appears the Delaware Supreme Court justices or agents incited the arms to attack me by providing the information to DE-Lapp. I made a request for Chief Justice Collins J. Seitz, Jr. to recuse himself. *Id.* So, he did not participate in *Kelly v Trump*. Three Delaware Supreme Court Justices participated in the matter which is a source of Defendants' unlawfully motivated petition against me, Justices, Vaughn, Traynor and Montgomery-Reeves. (D.I. App A, App B); (Ex. D).

Pursuant to Federal Rules of Evidence Rule 605, "The presiding judge may not testify as a witness at the trial." I am not afforded the opportunity to ask the Delaware Supreme Court in the Board's venue or in the Delaware Supreme Court's venue to ascertain the Court's incitement and participation in the action by the Defendants. Neither is the ODC. I am not afforded a fair and impartial trial to determine the legality of the proceeding, for nominal damages, damages for emotional distress, injunctive or other additional equitable relief. The state forum does not afford a venue for the relief I seek. (Ex. E, Notice to the Supreme Courts of my objections of state court jurisdiction). Only the federal courts may afford me a fair, not fixed, opportunity to be heard. There is no guarantee of justice. Yet, injustice is guaranteed if the doors to the only fair,

¹⁰ (D.I. 9 at Ex 1, De-Lapp's letter); (D.I. 3, Ex 13 first petition relating to attorney license fees); (D.I. 4, US, Ex A-4, A-5, relating to second petition relating to license fees).

impartial forum, that may afford me, a party, with relief is closed due to pro se, in forma pauperis status, partiality to the state which is not permitted, or based on malicious motives such as religious political beliefs.

The members of the Delaware Supreme Court are material witnesses to the facts relating to my case and the petition against me. Pursuant to 28 USCS § 455 (b)(1) (5)(iv), "(b) [Judges] shall also disqualify [themselves] in the [if to] the judge's knowledge [he or she is] likely to be a material witness in the proceeding." Pursuant to 28 USCS § 455 (b)(1) A judge shall disqualify himself, "(1) Where he has a personal bias or prejudice concerning a party, or personal knowledge of disputed evidentiary facts concerning the proceeding." The Delaware Supreme Court members have "personal bias or prejudice concerning a party, or personal knowledge of disputed evidentiary facts concerning the proceeding" in the illegal as applied proceeding in state court. Id.

The facts related to the ODC's petition arose in the Chancery and the Delaware Supreme Courts ("Courts"), and create the appearance of the Courts' "personal bias or prejudice concerning a party [me, and]" personal knowledge of disputed evidentiary facts concerning the proceeding." Id. The Courts through its members or staff appeared to have instigated or participated in the retaliation or/and in interference with the exercise of my access to the courts, based on discriminating against me for my religious associated beliefs reflecting in my petitions and speech. Accordingly, the Courts must recuse themselves, pursuant to 28 USCS § 455, (a), § 455 (b)(1), and § 455 (b)(5)(iv.), and the Procedural and substantive Due process Clause.

The law library also was granted PACER access by the Delaware Supreme Court which is suspicious, evidence the Delaware Supreme Court is preparing a case against me. Justice Traynor also came into the law library looking for federal jury instructions, I believe to prepare

someone to sue me in federal court, which if it is true, makes a fair trial impossible in the Delaware Supreme Court. The state Court and the Board are without jurisdiction to hear my grievances for this unlawfully brought petition.

The Court erred as a matter of law, and creates manifest injustice by denying me a full and fair opportunity to be heard in violation of the Substantive and Procedural Due Process clause applicable to me, based on disparate treatment against me motivated by religious-political belief, *pro se informa pauperis* status, or overlooking the evidence, in clear error of the facts and clear error of legal arguments, blinded by partiality towards the state as opposed to the parties as equal under the law.

Since October 25, 2021, new and additional facts have arisen which must be considered by the Court to correct clear error of facts, to correct clear error of law and to prevent manifest injustice preventing me a full and fair opportunity make my case and litigate the issues.

On or about November 3, 2020, the Preliminary Review Committee met and determined a petition may be brought by Defendants against my person relating to my case *Kelly v Trump*.¹¹ Defendant indicated her desire to appoint counsel. I objected on religious and economic grounds. Despite my objection she requested appointed counsel with the Delaware Supreme Court. I filed a letter indicating I would object to appointed counsel, and another letter providing notice that I will object to the Supreme Court's subject matter jurisdiction. (Ex. E, F). On Fri., Dec. 10, 2021, the Board signed a notice of a hearing. I was not provided proper notice on Dec.10, 2021. On Mon., Dec. 13, 2021, the Delaware Supreme Court appointed counsel despite having notice of my objection to counsel which caused me great emotional distress. On Thur., Dec.16, 2021, I

¹¹ The Preliminary Investigative Committee can be removed from my complaint, as the injunctive relief sought is now moot. Additionally, should defendants David White and Kathleen Vavala abstain from involvement I will stipulate to their removal from the complaint, but I do not waive my one free Amendment of complaint before service to Defendants on this.

received a letter regarding the appointment. On Fri., Dec. 17, 2021, counsel contacted me. I immediately indicated my objection to his appointment. On Sat., Dec. 18, 2021, I filed the attached letter with the Board objecting to improper service, requiring a postponement on the hearing so I may be afforded discovery, and a decision on counsel, and notice that I intended to file a motion with the Delaware Supreme Court on Monday. (Ex. G). On Mon., Dec. 20, 2021, I filed *Respondent's Motion for reconsideration of order dated December 13, 2021, appointing counsel despite my notice of intent to object, and objection of improper service of the Board's Notice of Hearing, dated December 10, 2021*, with the Delaware Supreme Court, with a copy to Defendant, and the Board, albeit the Board's copy was mailed Dec.21, 2021. (Ex. H). On Dec. 21, 2021, I filed the attached letter with the Court rejecting appointment of counsel. (Ex. I). Appointed Counsel moved to terminate his appointment on Dec. 23, 2021. On Dec. 29, 2021, I filed a letter motion with the Court to inter alias object to counsel on 6th Amend. Grounds and postpone the hearing in the interest of justice. (Ex. J). The Court excused counsel.

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

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

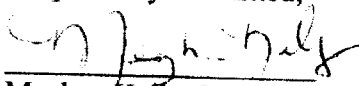
I have not received a response. The scheduled hearing is in less than 4 days. I did not receive proper notice, and have not received a response regarding discovery or postponement of the hearing. This is not a fair proceeding. This is punishment to bend my will to conform to the state's worship of business greed at the cost of selling my soul to hell, a cost too great. My faith

in Jesus teaches me not to be conformed to the world. The Constitution allows me to hold religious beliefs different from the state. The Constitution protects me from government retaliation for my beliefs, speech, association and petitions relating to my religious beliefs.

This Court must deny me an opportunity to be heard and a fair trial. No one is above the law. No one is below the Law. The constitution is under attack, and the United States needs you to uphold the limits on government that make us free, above procedural and statutes, or our union may dissolve. The world is on your shoulders, not in your hands to mold, but requiring you bear the burden of reading my religious thoughts and petitions, even if you disagree and do not understand my faith in Jesus Christ. You are free to believe differently than I, but you are required to uphold the constitution to protect those with diverse beliefs from mob lawless reign of lusts, with the rule of law. No one is below the law, even a peon like me. You strengthen our faith in equal access to the courts without disparate treatment in violation of the Equal protections component of the 5th amend. by opening the doors of the court to all people, regardless of poverty, religion, race, place of origin or association. You prevent people from taking justice in their own hands through misbehaving might makes right thinking, when might makes wrong. Please hear me your honor. It is the opportunity at justice, not guarantee I seek.

WHEREFORE, I respectfully request you amend findings of fact, alter the order, dated December 22, 2021, based on new findings of fact, to prevent clear error of facts, clear error of law, and to prevent manifest injustice.

1/10/22

Respectfully submitted,

Meghan Kelly, Esquire
DE Bar Number 4968
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com, (3,728 Words)

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

Dated: 1/10/22

Meghan Kelly (printed)

Meghan Kelly (signed)



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**TABLE OF CONTENTS OF EXHIBITS
TO 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**

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.

EXHIBIT B Pages of the Complaint relating to claims for damages for infliction of emotional distress

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

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.

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

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.

EXHIBIT F Letter to court, dated November 22, 2021, regarding my intent to object to appointment of counsel on religious grounds.

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

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.

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.

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.

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.

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.

Exhibit A

Office of Disciplinary Counsel
SUPREME COURT OF THE STATE OF DELAWARE

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

DAVID A. WHITE
Chief Disciplinary Counsel

PATRICIA BARTLEY SCHWARTZ
Disciplinary Counsel

KATHLEEN M. VAVALA
Disciplinary Counsel

August 23, 2021

CONFIDENTIAL
VIA EMAIL & U.S. MAIL

Meghankellyesq@yahoo.com

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

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

Dear Ms. Kelly:

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

Under Rule 9(a) of the Delaware Lawyers' Rules of Disciplinary Procedure, the ODC "shall screen and evaluate all information coming to its attention by complaint or otherwise concerning possible misconduct by or incapacity of a lawyer." Procedural Rule 19 (c) provides "Information relating to a lawyer's physical or mental condition which adversely affects the lawyer's ability to practice law shall be investigated by the ODC. If there are reasonable grounds to believe the interests of respondent's clients or the public are endangered, such information shall be the subject of formal proceedings to determine whether the respondent shall be transferred to disability inactive status. The procedures and hearings shall be conducted in the same manner as disciplinary proceedings. The Board may take or direct whatever action it deems necessary or proper to determine whether the respondent is so incapacitated, including the examination of the respondent by qualified medical experts at the respondent's expense. If, after reviewing the recommendation of the Board and upon due consideration of the matter, the Court concludes that the respondent is incapacitated from continuing to practice law, it shall enter an order transferring the respondent to disability inactive status for an indefinite period and until further order of the Court."

DE Supreme Court
relating to substantial burden upon my religious exercise, speech, affiliation & petitions relating to my religious beliefs under RFRA

Exhibit B

and DE-Lapp employee, Carol Waldhauser (“Carol”) and Eleanor Kiese (“Kiese”), Delaware agents, or arms conspired unlawfully to pressure Plaintiff to forgo her case to protect her free exercise of religion, or to obstruct, deter, by force of government authority, intimidate, impede and threaten, a party, me, Meghan Kelly in the Chancery Court, and, also in the United States Supreme Court case *Kelly v Trump*, from attending such courts, of from “testifying to any matter pending therein, freely, fully, and truthfully, or to injure such party ... in (her) person or property.”

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

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

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

23. Defendants seek to injure me in my person or property by 4. intentionally or recklessly causing emotional distress manifesting in physical symptoms for the exercise

of my First Amendment rights to petition, speech, exercise religion, and association, in violation of those rights.

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

25. Someone threw a white thick substance at car in Millsboro, apparently to show their disdain to my speech, my stickers. I took my stickers off. Since so many people gave me the middle finger, and I did not want harm to come to me or my property based on my speech. District Court Exhibit 1.

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

27. A few people have called me, a democrat, a "demon-crat," making jokes that are not funny. If they go beyond a joke, it is no laughing matter. There have been attacks against fellow Americans based on party orientation have gone beyond jokes in recent years. See US Ex-Ex 23, relating to 54 cases invoking former President Trump in cases in connection to threats or violence. See US Ex-Ex 24 relating to former President Trump encouraging the militarization of police arguably to combat citizens who exercise their freedom to associate to speak to protest his government policies. See, US Ex-Ex 25, where former President Trump manufactures the threat that protestors exercising their freedom of speech and association will loot. Thereby, Trump, a government agent,

Threats or violence

goers believe Trump is 'anointed by God', By Caleb Parke, May 13, 2020; US Ex-Ex 36
CBS NEWS, *Trump tweets quote calling him the "second coming of God" to Jews in Israel*,
By Sophie Lewis, Aug. 21, 2019.

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

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

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

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

40. Should the Defendants be permitted to label me "disabled" and I am in actual danger in the future, that label may prevent other people from taking me seriously

or from helping me. I am scared of potential violence taken against me.

41. My friend, Greg Layton and his wife were shot at in their home for their alleged speech as I indicated in my DE Supreme Court Brief. There has been an uptick in violence in our nation. District Court Exhibit 3. On January 6, 2021, an attempted insurrection occurred at the capital, and people are still talking about “hanging the politicians,” civil war and overthrowing the government in Sussex County. It is scary. I am concerned about my safety as I seek to freely exercise my speech, association and religion. That is one reason why I asked the Chancery Court for protection to reduce the violence I believe rooted in the establishment of government-religion by barter or exchange, not freedom or free exercise of religion. US Ex-Appendix E.

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

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

44. The right to assemble and associate must be protected, but the right of artificial entities such as associations must not sacrifice individual’s liberty to maintain

negotiations until the issues in this case are resolved.

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

186. 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.

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

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

clean off of my computer.

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

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

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

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

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

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

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

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

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.

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

208. This is real life and Defendants place me in real danger, to be demeaned if something further happens to me, as "crazy." So others may say "do not listen to her." I disagree with both the democrats and republicans and those in power concerning bad ideas

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

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

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

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

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

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

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

government agents substantially burdening my free exercise of religion to the forced, compelled exercise of their will, similar to now, making me relive painful experiences.

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

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

303. The press helped me by putting me on TV and the newspaper, but no actual relief resulted, only harm. I was freaked out and emotionally exhausted. There was a bunch of baby rats trying to climb up my bed as I tried to get sleep. I was horrified. I did not pass the Pennsylvania Bar on the first try. I got super high scores the second time and allegedly high scores in Delaware passing the Delaware bar on the first try. I should not be ashamed. I was disappointed in the cold heartedness by the officials of a Christian law school. Please see Exhibit 19 Duquesne, a CD where I saved a file to be opened as a file not as a CD, of a news clipping where newscasters tried to help me. Also see, District Court Exhibit 20, a newspaper article where the news reporter tried to help me.

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

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.

*It is the opportunity not justice I must
be afforded not guaranteed. The doors
are closed to the poor and weak.*

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:

Insulting

“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 lab top stopped working, that day, August 23, 2021.

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

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

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

314. I am scared for my life. People have been killed based on perceived government-religion and government-religious beliefs.

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

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

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

318. An out of state stranger, proclaiming to be from Maryland, took off his mask and yelled at me, while getting uncomfortably close, accusing me of supporting President Biden. I feared he was potentially subjecting me to covid19. I did not know how an out of state stranger knew I did not support President Trump. I thought it might have been

because I proposed five separate articles to impeach former President Trump on and contacted all 541 federal members of congress concerning the articles.

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

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

321. The ODC intentionally threatened me with the August 23, 2021 letter to interfere with my appeal, by distracting me, causing alarm, in retaliation for the exercise of my speech, religion, association and right to petition the court.

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

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

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

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

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

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

“This email is to confirm, I will not be evaluated, as such evaluations violate my religious beliefs. I alerted the US Supreme Court to the same in my petition for the writ of cert., relating to emotional damages related to the President’s conduct. Desist impeding in my access to the courts without government obstruction and retaliation for my exercise of my first Amendment rights. I am an injured party, not an attorney practicing in this case. A Court staff member sought to sabotage my case by misleading me to almost miss the filing deadline to appeal the Master’s final report, dated November 2, 2020. That same staff member instructed me to cross off the civil process clerk’s address on a praecipe to impede the case from going forward. That member objects to my religious association beliefs in support of Trump and government agents exercise of religion while governing. Judge Clark also sought to interfere with my case. Government and court attacks against a party in an active case to impede justice, based on my case, is inappropriate and unlawful. I do not seek disciplinary recourse at this time should this arm of the Supreme Court and other members of the government refrain from persecuting me based solely on exercise of my Constitutional rights based on religion, association or poverty. Thank you” Delaware District Court Exhibit 24.

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

329. In the attached letter, incorporated herein by reference as an exhibit, District

beliefs, constitutionally protected speech, association, or poverty in violation of the First Amendment applicable to the Defendants pursuant to the Fourteenth Amendment.

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

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

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

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

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

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

453. Defendants intimidated me, a party in the *Kelly v Trump* law suit, conspiring with two or more people to threaten, influence, hinder, impede, obstruct, defeat me from bringing *Kelly v Trump*, denying me, a citizen, equal protections of the laws, based on

1958

WHEREFORE, Meghan Kelly respectfully requests that this Honorable Court:

1. Enter an Order to permanently enjoining and restraining Defendants from punishing Meghan Kelly for exercise of her first amendment right of speech, religion and association, and access to the courts as an aggrieved party.

2. Enter an Order awarding Plaintiff attorney fees pursuant to 42 USC 1988, should she retain an attorney, and costs, and possibly damages emotional distress, to the extent authorized by law and other such relief as the Court deems proper and just, if applicable.

Dated: Oct. 21, 2021

Respectfully Submitted,

Meghan Kelly

/s/Meghan Kelly

Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
Pro se, not attorney

Bar Number 4968

*Damages for
Emotional distress
I admit I pled for
damages worthfully under
great stress and time constraints
Non-mal Damages should be
included too*

Exhibit B 2

MEGHAN MARIE KELLY, ESQUIRE
.....

December 1, 2021

RE: ODC v Kelly, Board No 115327 B

Dear Honorable Board members of the Professional Committee and Justices of the Delaware Supreme Court:

On November 19, 2021, I sent my answers, objections, and request for dismissal based on lack of subject matter jurisdiction as applied to the ODC on November 19, 2021, per the attached confirmation of receipts from the US Post office, Exhibits 1 and 2.

On Wednesday, November 24, 2021, I asked Patricia Swartz for the ODC's confirmation of receipt. See the attached Exhibit 3.

On Sunday, November 28, 2021, Patricia Schwartz sent an Email indicating she was not sure what I was confirming receipt of, even though her referral to Procedural Rule 9(d)(2), indicated otherwise. See Exhibit 4. She knew I was confirming receipt of my answers to her petition as revealed by her reference to the 20 day rule. I responded with clarification. Exhibit 4.

Monday, November 29, 2021, was the deadline to file answers.

On Tuesday, November 30, 2021, after the deadline past, Patricia sent the attached Email contained in Exhibit 3, indicating she did not receive the answers.

I believed she was lying. So, I mailed out a second copy of the answers on November 30, 2021, with the plan to argue excusable neglect or error should Patricia Swartz fight me on the issue. Exhibit 5.

Then, I came home and responded via Email per Exhibit 3,

“Ms. Swartz,

Please look at the attached return receipt again. I sent it to you the counsel for the ODC, at the address you signed for on the last page of the Petition you filed.

Please look at the attached return receipt again. I sent it to you the counsel for the ODC, at the address you signed for on the last page of the Petition you filed.

Is it possible you have not been in the office physically to pick up your mail? You avoided responding to my request for a confirmation last Wednesday, November 24, 2021, and yesterday, November 29, 2021 as a strategy to make me expend costs I cannot afford, and to harass me in bad faith. I sent out my answer to the ODC again.

I also went to the post office and they confirmed your receipt, not on November 21, 2021 as I mistakenly stated below, but November 22, 2021. See the first and second confirmation of receipt attached hereto.

I am copying your counsel. This is unacceptable.

It is unacceptable that the Delaware District Judge misleadingly referred to the Aug 23 letter you drafted to the Chancery Court without referring to the Delaware Supreme Court comment you made too.

I am disappointed in you for playing dumb on your Sunday ... E-mail, pretending you did not know what I was referring to while pointing to the 20 day rule, revealing you knew exactly what I was confirming receipt for, my answer.

Please confirm receipt of the second box sent. Thank you.

On an aside, I prefer to be called Meg, not Ms. Kelly due to religious beliefs. In the bible it teaches us not to use surnames, like master or teacher to maintain humility and grace and equality of human worth and dignity in the eyes of God. I believe people should be respected unearned, required by God unconditionally because every person exists for God, not for man to exploit for money and material gain, dehumanizing those who have the power to reflect the image of God. This is the second time I am making the request.

Thank you. You are not required to adopt my religious beliefs or understand them in order to respect them, though I am willing to help you understand my religious beliefs.

Regards,
Meg”

Patricia Swartz sent an Email indicating she received my answer in Tuesday, November 30's mail. Exhibit 6. That is not true. I mailed the second box November 30th with a plan to argue excusable neglect.

Patricia Swartz could not have received a package I mailed out immediately prior to my response to her Email on Tuesday, November 30, 2021. See, Exhibits 5 and 6.

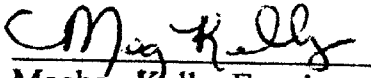
I am merciful and hope to be bestowed mercy and grace for correction to avoid condemnation and to prevent government reign by evil threats and fear to eliminate freedom through control instead of serving through guidance and love. However, covering up government misbehavior and mistakes with false assertions is wrong. Consider making our government and courts more just without retaliation against those for petitioning to the government relating to government grievances.

Attached, please find one petition I did not include in my Answer to the ODC or in my appeals in Kelly v Trump, attached hereto as Exhibit 7. This is one of the petitions, I believe I am being retaliated against by the ODC and their agents, DE-Lapp and Judge Clark.

Please note, I was wrong in that the Sheriff could serve the US Attorney General David Weiss, but being wrong does not make me dangerous. It makes me human. It made me so sad when Arlaine Simmons, the staff at the Chancery Court, instructed me to cross off the civil process clerk's address to prevent service on the October 12, 2021 praecipe. I do not want her to get into trouble. However, I should not get into trouble to serve the mere appearance of the court to cover up unfair and unjust court agents' conduct against me. Justice sheds light on injustice. Injustice covers up wrongs with more wrongs. Please do not create additional injustice to protect the illusion justice occurred by ignoring unjust behavior.

Thank you.

Dated December 1, 2021


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 970)

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

Dated: December 1, 2021

Meghan Kelly (printed)

Meg Kelly (signed)

Exhibit 1



GEORGETOWN
115 S KING ST
GEORGETOWN, DE 19947-9998
(800) 275-8777

11/19/2021

03:49 PM

Product

Qty Unit Price

Price

Priority Mail® 1-Day[®]
Lr Flat Rate Box
Wilmington, DE 19801
Flat Rate

Expected Delivery Date
Sat 11/20/2021

Certified Mail®
Tracking #: 7020316144445117945

Total

Grand Total

Cost
of Mail

\$3.75

\$22.65

\$26.40

\$30.00

-\$3.00

U.S. Postal Service[™]
CERTIFIED MAIL[®] RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com

WILMINGTON, DE 19801

Certified Mail Fee	\$3.75
Extra Services & Fees (check box, add fee as appropriate)	\$0.00
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$22.65

Total Postage and Fees \$26.40

0947
25

Postmark
Here

11/19/2021

Sent To: Drighana Goyal P. B. S. Sinc
Street and Apt. No., or PO Box No. 515 Suite 422
City, State, ZIP+4[®] Wilmington DE 19801
PS Form 3800, April 2015 PSN 7530-02-000-9000 See Reverse for Instructions

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available due to the impacts of
COVID-19. We appreciate your patience.

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and data rates may apply. You may also
visit www.usps.com Tracking or call
1-800-275-3811.

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insurance. For information on filing an
insurance claim go to
<http://www.usps.com/help/claims.htm>

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Track your Packages
Sign up for FREE
<https://informedelivery.usps.com>

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purchases of Priority Mail labels
with the new Loyalty program by
using track and ship. Visit
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Share with your mail carrier.





GEORGETOWN
115 S KING ST
GEORGETOWN, DE 19947-0005
(800) 275-8777

11/19/2021
Product

Qty Unit Price
03:31 PM
\$22.65

Priority Mail® 1-Day 1
19 Flat Rate Box
Wilmington, DE 19801
Flat Rate
Expected Delivery Date
Sat 11/20/2021
Certified Mail®
Tracking #:
70203160000000000000000000000000

Total

Grand Total:

Cash
Change

USPS is experiencing unprecedented volume increases and limited employee availability due to the impacts of COVID-19. We appreciate your patience.

Text your tracking number to 20777 (2USPS) to get the latest status, Standard Membership and Data later may apply. You may also visit www.usps.com for USPS Tracking or call 1-800-222-1811.

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<http://www.usps.com/help/claims.htm>

Preview your Mail
Track your Packages
Sign up for FREE
<http://usps.com/meddelivered>
Earn rewards on your purchases and rewards purchases of Priority Mail labels with the USPS Loyalty program by using Click and Ship. Visit www.usps.com/smallbizloyalty for more info.

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Go to <https://usps.com/customer-feedback>
or scan this code with your mobile device.



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For delivery information, visit our website at www.usps.com

Wilmington, DE 19801

Certified Mail Fee \$3.75

Extra Services & Fees (check box, add fee as appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage \$22.65

Total Postage and Fees \$26.40

Postmark Here
11/19/2021

Sent To: Administrative Assistant to the Director
Rep 405 N. King Street, Suite 505
Wilm, DE 19801

PS Form 3800, April 2015 (with PSN 02-000-301) See Reverse for Instructions

USPS Tracking®

[FAQs >](#)

[Track Another Package +](#)

Tracking Number: 70203160000051779738

[Remove X](#)

Your item has been delivered to an agent for final delivery in WILMINGTON, DE 19801 on November 22, 2021 at 1:35 pm.

Delivered to Agent for Final Delivery

November 22, 2021 at 1:35 pm
WILMINGTON, DE 19801

[Feedback](#)

Get Updates 

Text & Email Updates 

Tracking History 

Product Information 

[See Less](#) 

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USPS Tracking®

[FAQs >](#)

[Track Another Package +](#)

Tracking Number: 70203160000051779745

[Remove X](#)

Your item has been delivered to an agent for final delivery in WILMINGTON, DE 19801 on November 22, 2021 at 1:35 pm.

Delivered to Agent for Final Delivery

November 22, 2021 at 1:35 pm
WILMINGTON, DE 19801

Feedback

Get Updates 

Text & Email Updates



Tracking History



Product Information



See Less 

Can't find what you're looking for?

Go to our [FAQs](#) section to find answers to your tracking questions.



GEORGETOWN
115 S KING ST
GEORGETOWN, DE 19947-9998
(800) 275-8777

11/19/2021 03:49 PM
Product Qty Unit Price
\$22.65

Priority Mail® 1-Day 1
Flat Rate Box
Wilmington, DE 19801
Flat Rate \$3.75
Expected Delivery date
Sat 11/20/2021
Certified Mail® \$26.40
Tracking #:
7020315110005179147

Total \$26.40
Grand Total \$50.00
-\$3.60

11/19/2021
11:31 AM

USPS is not taking any credit for the
impairment and limited employees
available due to the impacts of
COVID-19. We appreciate your patience.

For more information, visit our website at www.usps.com
and call 1-800-275-8777 (2USPS)
to get the latest status. Standard Mail®
and data rates may vary. You may also
visit www.usps.com for Tracking or call
1-800-275-8777.

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insurance claim go to
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Sign up for FREE
<https://informedelivery.usps.com>

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purchases of Priority Mail labels
with the new Loyalty program by
using Ink and Ship. Visit
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Wilmington, DE 19801

7020 3160 0000 5177 9745

Certified Mail Fee	\$3.75	
Extra Services & Fees (check box, add fee as appropriate)		\$0.00
<input type="checkbox"/> Return Receipt (hardcopy)		\$0.00
<input type="checkbox"/> Return Receipt (electronic)		\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery		\$0.00
<input type="checkbox"/> Adult Signature Required		\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery		\$0.00
Postage	\$22.65	
Total Postage and Fees	\$26.40	

Postmark Here
0947 25
11/19/2021

Sent To: Deborah Carol Patricia B. Sore
Street and Apt. No., or P.O. Box No. St. Suite 421
City, State, ZIP+4® Wilmington, DE 19801

PS Form 3800, April 2015 PSN 7530-02-000-9000 See Reverse for Instructions

Exhibit 2

Product Tracking & Reporting



November 29, 2021

Dear Postal Customer:

The following is in response to your request for proof of delivery on your item with the tracking number: **7020 3160 0000 5177 9738.**

Item Details

Status:	Delivered to Agent for Final Delivery
Status Date / Time:	November 22, 2021, 1:35 pm
Location:	WILMINGTON, DE 19801
Postal Product:	Priority Mail®
Extra Services:	Certified Mail™ Up to \$50 insurance included

Shipment Details

Weight: 10lb, 0.0oz

Recipient Signature

Signature of Recipient: (Authorized Agent)	KG-e19 1KG-C19
Address of Recipient:	405 King St

Note: Scanned image may reflect a different destination address due to Intended Recipient's delivery instructions on file.

Thank you for selecting the United States Postal Service® for your mailing needs. If you require additional assistance, please contact your local Post Office™ or a Postal representative at 1-800-222-1811.

Sincerely,
United States Postal Service®
475 L'Enfant Plaza SW
Washington, D.C. 20260-0004

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November 29, 2021

USPS Tracking Intranet

Delivery Signature and Address

Tracking Number: 7020 3160 0000 5177 9745

This item was delivered on 11/22/2021 at 13:35:00

[< Return to Tracking Number View](#)

Signature	<p>KG-e19</p> <p>1KG-C19</p>
Address	<p>405 King</p> <p>St</p>

Enter up to 35 items separated by commas.

Select Search Type:

Product Tracking & Reporting, All Rights Reserved
Version: 22.1.1.0.29

Exhibit 3

115327-B/ODC waited until 11/30/21 to confirm/ No. 21-1490

From: Meg Kelly (meghankellyesq@yahoo.com)
To: patricia.schwartz@delaware.gov
Cc: angela.james@delaware.gov; renee.buskirk@delaware.gov; zi-xiang.shen@delaware.gov;
ryan.costa@delaware.gov
Bcc: meghankellyesq@yahoo.com; 1id4megkelly@gmail.com
Date: Tuesday, November 30, 2021, 04:00 PM EST

Ms. Swartz,

Please look at the attached return receipt again. I sent it to you the counsel for the ODC, at the address you signed for on the last page of the Petition you filed.

Is it possible you have not been in the office physically to pick up your mail? You avoided responding to my request for a confirmation last Wednesday, November 24, 2021, and yesterday, November 29, 2021 as a strategy to make me expend costs I cannot afford, and to harass me in bad faith. I sent out my answer to the ODC again.

I also went to the post office and they confirmed your receipt, not on November 21, 2021 as I mistakenly stated below, but November 22, 2021. See the first and second confirmation of receipt attached hereto. I am copying your counsel. This is unacceptable.

It is unacceptable that the Delaware District Judge misleadingly referred to the Aug 23 letter you drafted to the Chancery Court without referring to the Delaware Supreme Court comment you made too.

I am disappointed in you for playing dumb on your Sunday night per the attached E-mail, pretending you did not know what I was referring to while pointing to the 20 day rule, revealing you knew exactly what I was confirming receipt for, my answer.

Please confirm receipt of the second box sent. Thank you.

On an aside, I prefer to be called Meg, not Ms. Kelly due to religious beliefs. In the bible it teaches us not to use surnames, like master or teacher to maintain humility and grace and equality of human worth and dignity in the eyes of God. I believe people should be respected unearned, required by God unconditionally because every person exists for God, not for man to exploit for money and material gain, dehumanizing those who have the power to reflect the image of God. This is the second time I am making the request.

Thank you. You are not required to adopt my religious beliefs or understand them in order to respect them, though I am willing to help you understand my religious beliefs.

Regards,
Meg

On Tuesday, November 30, 2021, 09:54:16 AM EST, Schwartz, Patricia (Courts) <patricia.schwartz@delaware.gov> wrote:

Ms. Kelly

To date we have not received your mailed copy of the Answer to the Petition. I note the proof of receipt you provided states it has been delivered to the USPS agent in Wilmington for final delivery and does not state delivery to the ODC. Additionally your below email and attachments were received by the ODC on Sunday November 21, 2021. Although there is a certificate of service for the answer no answer was attached.

Patty Schwartz

Patricia Bartley Schwartz
Office of Disciplinary Counsel
Supreme Court of Delaware
405 N. King Street, Suite 420
Wilmington, DE 19806
Temporary number 302-668-3467

From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Sunday, November 21, 2021 6:19 PM
To: James, Angela D (Courts) <Angela.James@delaware.gov>
Cc: Schwartz, Patricia (Courts) <Patricia.Schwartz@delaware.gov>
Subject: Re: CONFIDENTIAL Board Case No. 115327-B

Good evening,

I intend to object to such appointment. Attached, please find some exhibits your office received over the weekend, which may not be included in the CD. I believe some of the exhibits may have been named wrong too. So, please compare the paper exhibits.

You gave me no time to scan in the exhibits and to take with the answers with the threat of appointed counsel which violates my religious beliefs with regards to this case.

It was more important to get something out before you get another attorney to represent me, despite typos and errors. I intend to object.

Attached, please find the signature page and cert of service too.

Please let me know if you would like the word version of my answers. I would like the word version of your requests too. Though, we do not necessarily have to go through requests as we can ask each other directly.

How much time do I have to object? I could use a week to collect my bearings. I have not received anything in the mail, and I do not know if you contacted the Court ex parte despite my objections on religious and economic grounds.

Have a good week. Stay safe.

A disappointed,

Meg

On Thursday, November 18, 2021, 10:02:28 AM EST, James, Angela D (Courts) <angela.james@delaware.gov> wrote:

Dear Ms. Kelly:

Please see the attached letter from Patricia Bartley Schwartz in regards to the above-captioned case; which the original has been sent to you via U.S. First Class Mail.

Thank you.

Angela James

Paralegal

Office of Disciplinary Counsel

The Renaissance Centre

405 North King Street, Suite 420

Wilmington, DE 19801

(302) 651-3931

(302) 651-3939 (fax)



CONFIDENTIALITY NOTICE: *This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential or proprietary information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, immediately contact the sender by reply e-mail and destroy all copies of the original message.*



nov 22 confirmed receipt.pdf

163.9kB



scan0002.pdf
46.8kB



email sunday and wednesday confirming answers received.pdf
45.4kB

Exhibit 4

Re: Confirmation of receipt of answers/ODC v Meg/ November 22, 2021, Monday

From: Meg Kelly (meghankellyesq@yahoo.com)

To: patricia.schwartz@delaware.gov

Cc: renee.buskirk@delaware.gov

Date: Sunday, November 28, 2021, 12:06 PM EST

Good morning,

I am confirming receipt of my answers to your petition, not any Email. The attached confirmation of receipt indicates you received them Monday November 22, 2021.

I am sure you have them, but I prefer to confirm before the 20 day deadline.

Please confirm.

Thank you,
Meg

Please also call me Meg not Ms. Kelly. Thank you.

On Sunday, November 28, 2021, 08:06:37 AM EST, Schwartz, Patricia (Courts) <patricia.schwartz@delaware.gov> wrote:

Ms. Kelly

The ODC has received numerous emails with attachments from you in the past week. I am not sure which one you are referring to in your below email. Therefore, I am not able to confirm. Would you please specify what email contains your response? I also refer you to Procedural Rule 9(d)(2).

Thank you

Patty Schwartz

Patricia Bartley Schwartz

Office of Disciplinary Counsel

Supreme Court of Delaware

405 N. King Street, Suite 420

Wilmington, DE 19806

Temporary number 302-668-3467

From: Meg Kelly <meghankellyesq@yahoo.com>

Sent: Wednesday, November 24, 2021 12:37 PM

To: Schwartz, Patricia (Courts) <Patricia.Schwartz@delaware.gov>

Cc: James, Angela D (Courts) <Angela.James@delaware.gov>; Meg Kelly <meghankellyesq@yahoo.com>
Subject: Confirmation of receipt of answers/ODC v Meg

Good afternoon,

I write to request a confirmation that you received my answers to your petition.

Thank you. I hope you enjoy your long holiday weekend, and stay safe.

Very truly,

Meg



The_Fourth_Industrial_Revolution_pdf.pdf
1.6MB



scan.pdf
163.9kB

Exhibit 5



DAGSBORO
 28290 CLAYTON ST
 DAGSBORO, DE 19939-9998
 (800)275-8777

11/30/2021 02:49 PM

Product	Qty	Unit Price	Price
Priority Mail® 1-Day 1			\$22.65
Lg Flat Rate Box			
Wilmington, DE 19801			
Flat Rate			
Expected Delivery Date			
Wed 12/01/2021			
Certified Mail®			\$3.75
Tracking #:			
70210350000131668111			
Return Receipt			\$3.05
Tracking #:			
9590 9402 6468 0346 1011 95			
Total			\$29.45

Grand Total:			\$29.45

Cash			\$30.00
Change			-\$0.55

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Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit www.usps.com USPS Tracking or call 1-800-222-1811.

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www.usps.com/careers

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Tell us about your experience. Go to: <https://postalexperience.com/Pos> or scan this code with your mobile device.



TT19 99TE 1000 05E0 1202

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W I L D O N F I D I A L U S E	
Certified Mail Fee \$3.75	0939 06
Extra Services & Fees (check box, add fee to postage) <input type="checkbox"/> Return Receipt (hardcopy) \$0.00 <input type="checkbox"/> Return Receipt (electronic) \$0.00 <input type="checkbox"/> Certified Mail Restricted Delivery \$0.00 <input type="checkbox"/> Adult Signature Required \$0.00 <input type="checkbox"/> Adult Signature Restricted Delivery \$0.00	Postmark NOV 30 2021
Postage \$22.65	11/30/2021
Total Postage and Fees \$29.45	
Sent To <i>Patricia Swartz Office of Disc. Coord.</i> Street and Apt. No., or PO Box No. 405 N. K. St. Suite 420 City, State, ZIP+4® W. Va. DE 19501	
PS Form 3800, April 2015 PSN 7530-02-000-9000 See Reverse for Instructions	

Exhibit 6

RE: 115327-B/ODC waited until 11/30/21 to confirm/ No. 21-1490

From: Schwartz, Patricia (Courts) (patricia.schwartz@delaware.gov)

To: meghankellyesq@yahoo.com

Cc: angela.james@delaware.gov

Date: Tuesday, November 30, 2021, 04:05 PM EST

Ms. Kelly

The ODC received a box in today's mail with your answer exhibits and a CD.

Therefore, I am confirming receipt.

Patty Schwartz

Patricia Bartley Schwartz

Office of Disciplinary Counsel

Supreme Court of Delaware

405 N. King Street, Suite 420

Wilmington, DE 19806

Temporary number 302-668-3467

From: Meg Kelly <meghankellyesq@yahoo.com>

Sent: Tuesday, November 30, 2021 4:00 PM

To: Schwartz, Patricia (Courts) <Patricia.Schwartz@delaware.gov>

Cc: James, Angela D (Courts) <Angela.James@delaware.gov>; Buskirk, Renee (Courts)

<Renee.Buskirk@delaware.gov>; Shen, Zi-Xiang (DOJ) <Zi-Xiang.Shen@delaware.gov>; Costa, Ryan (DOJ)

<Ryan.Costa@delaware.gov>
Subject: 115327-B/ODC waited until 11/30/21 to confirm/ No. 21-1490

Ms. Swartz,

Please look at the attached return receipt again. I sent it to you the counsel for the ODC, at the address you signed for on the last page of the Petition you filed.

Is it possible you have not been in the office physically to pick up your mail? You avoided responding to my request for a confirmation last Wednesday, November 24, 2021, and yesterday, November 29, 2021 as a strategy to make me expend costs I cannot afford, and to harass me in bad faith. I sent out my answer to the ODC again.

I also went to the post office and they confirmed your receipt, not on November 21, 2021 as I mistakenly stated below, but November 22, 2021. See the first and second confirmation of receipt attached hereto. I am copying

Exhibit 7

November 6, 2020

Court of Chancery Courthouse
34 The Circle
Georgetown, DE 19947

REGISTER IN CHANCERY
GEORGETOWN DELAWARE
2020 NOV - 9 A 9 57

**RE: Meghan Kelly v. the President of the United States,
Defendant, Donald Trump, a.k.a. Donald J. Trump, a.k.a.
President Trump, a.k.a. President Donald Trump, his official
capacity as President of the United States Case No. 2020-0809-
PWG
Second Amended Complaint, Exceptions**

Dear Honorable Master Griffin:

On November 4, I talked with the court's staff. They indicated I hold off on subpoenas until I receive some routine paperwork from you. I asked if I was in trouble. They indicated I was not. It appears I am.

I googled Meghan v Trump and discovered you recommended a dismissal of my case. I immediately contacted the Chancery Court, and asked permission to pick up a copy, which was not received until the pick up late on November 6, 2020.

"Ct. Ch. R. 144 requires a party to file a notice of exception to a draft report within seven days of the date of that draft report. Rule 144 does not require the exceptions themselves to be filed within seven days." See, *Hitchens v. Hastings*, 2010 Del. Ch. LEXIS 7, *1, 2010 WL 322992

The Court filed the recommendation on Monday, November 2, 2020.

Accordingly, I must file a Notice of Exceptions, on Monday, November 9, 2020, the next business day, to prevent dismissal, which does not afford me sufficient time to complete the exceptions themselves.

I respectfully submit the Notice of Exceptions herewith, on Monday, November 9, 2020, in accordance to the rule.

I respectfully request adequate time to draft the exceptions.

On October 12, 2020, I hand delivered a Second Amended Complaint to this Honorable Court that added a prayer for declaratory relief to limit federal employees' freedoms under the first amendment, such as President Trump, in order not to chill the freedoms of those a federal employee, Defendant, serves, and to add the United States as a Defendant, in accordance to the requirements under FRCP, Rule 12.

On October 12, 2020, I also hand delivered three praecipes, one of which included a praecipe for an in-state Defendant, the civil process clerk for the US Attorney's Office for the District of Delaware, US Attorney's Office.

The Honorable Court's staff requested I seek permission from this Honorable Court to serve the civil process clerk by certified mail, in a manner that is not allowed under local rules.

I hand delivered letters and orders in accordance with the Court's staff's request for alternative service pursuant to the Chancery Court Rule 4 (d)(7).

Yet, no subpoenas have been issued at this time for the Second Amended Complaint, nor has a subpoena been issued for the civil process clerk for the Amended Complaint.

The US Attorney for the District of DE has not been served anything. Once served, pursuant to 28 USCS § 1446, he is afforded 30 days from service to apply for removal of the entire case to the District Court, despite the other two defendants being time barred this week.

The Federal rules conflict with the state rules of service for the civil process clerk. The Federal rules require in state service via registered or certified mail if I use the civil process clerk, which is not expressly permitted under the local rules.

I think it more prudent to amend the unserved complaint to serve the US Attorney for the District of Delaware, David C. Weiss, Esquire pursuant to FRCP Rule 12 (1)(A), which permits service via the sheriff under local rules and federal rules, in place of the civil process clerk.

Since, none of the Defendants have been served, assuming my case is not dismissed, may I please amend the Second Amended complaint to

address this Honorable Court's concerns, after exceptions are filed, to replace the civil process clerk with the US Attorney for the District of Delaware, and to clean up errors such as correct the misspelling in the title of the Complaint Amended(ed).

My heart is falling to the floor since I desired this Honorable Court to also prevent violence, under the guise of Godliness. Yet, I do not believe your honor will.

The President has been stirring up the pot of unrest by talking of the left, "taking away guns," I fear only to devour his own supporters by increasing the temptation they exercise the second amendment, when courts would likely deem it suspended.

Constitutional freedoms are suspended during national emergencies to preserve life. Defendant encourages lawlessness, under the guise of law, to foreseeably use the insurrection act to harm and kill people he is charged to serve. The President tempts folks to exercise the second amendment, when the courts allow the president to remove freedoms (which will predictably include the 2nd amendment) during times of emergencies, creating a trap, tempting folks to lawlessly behave only to gain authority to harm and kill his own citizens under the Insurrection Act. (See Exhibits A, Provisions of the

Insurrection Act, and B, articles relating to the Defendant's use of the threat of violence).

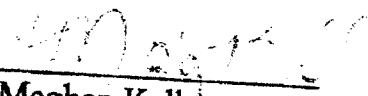
I was also hoping this Court may hold the Insurrection Act unconstitutional, should Defendant use it, for his own gain, at the expense of those he serves. While, yes the Supreme Court has allowed the executive branch to remove freedoms to safeguard lives during national emergencies such as war, it is not a license for the President to take lives, or to violate the constitution.

The purpose of the second amendment, protection from reign by government violence or threat of violence is eliminated, during times of national emergencies, during the time it was intended to be used against reign by violence. The common man may not be aware lawlessness is not the law. I will set this issue aside.

This Court may yet balance the executive branch to prevent tyrannical, limitless, reign by one unchecked, unbalanced limb.

Thank you for the opportunity to address your concerns.

Very truly,


Meghan Kelly
Pro Se
34012 Shawnee Drive
Dagsboro, DE 19939

(Word 996)

EXHIBIT A

10 USCS § 252

Current through Public Law 116-182, approved October 21, 2020.

United States Code Service > TITLE 10. ARMED FORCES (§§ 101 — 18506) > Subtitle A. General Military Law (Pts. I — V) > Part I. Organization and General Military Powers (Chs. 1 — 24) > CHAPTER 13. Insurrection (§§ 251 — 255)

§ 252. Use of militia and armed forces to enforce Federal authority

Whenever the President considers that unlawful obstructions, combinations, or assemblages, or rebellion against the authority of the United States, make it impracticable to enforce the laws of the United States in any State by the ordinary course of judicial proceedings, he may call into Federal service such of the militia of any State, and use such of the armed forces, as he considers necessary to enforce those laws or to suppress the rebellion.

History

HISTORY:

Act Aug. 10, 1956, ch 1041, § 1, 70A Stat. 15; Jan. 6, 2006, P. L. 109-163, Div A, Title X, Subtitle F, § 1057(a)(2), 119 Stat. 3440; Dec. 23, 2016, P. L. 114-328, Div A, Title XII, Subtitle E, § 1241(a)(2), 130 Stat. 2497.

Annotations

Notes

HISTORY; ANCILLARY LAWS AND DIRECTIVES

Prior law and revision:

Amendment Notes

2006.

2016.

Other provisions:

Prior law and revision:

10 USCS § 253

Current through Public Law 116-182, approved October 21, 2020.

United States Code Service > TITLE 10. ARMED FORCES (§§ 101 — 18506) > Subtitle A. General Military Law (Pts. I — V) > Part I. Organization and General Military Powers (Chs. 1 — 24) > CHAPTER 13. Insurrection (§§ 251 — 255)

§ 253. Interference with State and Federal law

The President, by using the militia or the armed forces, or both, or by any other means, shall take such measures as he considers necessary to suppress, in a State, any insurrection, domestic violence, unlawful combination, or conspiracy, if it—

(1) so hinders the execution of the laws of that State, and of the United States within the State, that any part or class of its people is deprived of a right, privilege, immunity, or protection named in the Constitution and secured by law, and the constituted authorities of that State are unable, fail, or refuse to protect that right, privilege, or immunity, or to give that protection; or

(2) opposes or obstructs the execution of the laws of the United States or impedes the course of justice under those laws.

In any situation covered by clause (1), the State shall be considered to have denied the equal protection of the laws secured by the Constitution.

History

HISTORY:

Act Aug. 10, 1956, ch 1041, § 1, 70A Stat. 15; Oct. 17, 2006, P. L. 109-364, Div A, Title X, Subtitle H, § 1076(a)(1), 120 Stat. 2404; Jan. 28, 2008, P. L. 110-181, Div A, Title X, Subtitle F, § 1068(a)(1), 122 Stat. 325, Dec. 23, 2016, P. L. 114-328, Div A, Title XII, Subtitle E, § 1241(a)(2), 130 Stat. 2497.

Annotations

Notes

HISTORY: ANCILLARY LAWS AND DIRECTIVES

Prior law and revision:

Amendment Notes

2006.

2008.

10 USCS § 254

Current through Public Law 116-182, approved October 21, 2020.

United States Code Service > TITLE 10. ARMED FORCES (§§ 101 — 18506) > Subtitle A. General Military Law (Pts. I — V) > Part I. Organization and General Military Powers (Chs. 1 — 24) > CHAPTER 13. Insurrection (§§ 251 — 255)

§ 254. Proclamation to disperse

Whenever the President considers it necessary to use the militia or the armed forces under this chapter [10 USCS §§ 251 et seq.], he shall, by proclamation, immediately order the insurgents to disperse and retire peaceably to their abodes within a limited time.

History

HISTORY:

Act Aug. 10, 1956, ch 1041, § 1, 70A Stat. 16; Oct. 17, 2006, P. L. 109-364, Div A, Title X, Subtitle H, § 1076(a)(2), 120 Stat. 2405; Jan. 28, 2008, P. L. 110-181, Div A, Title X, Subtitle F, § 1068(a)(2), 122 Stat. 325; Dec. 23, 2016, P. L. 114-328, Div A, Title XII, Subtitle E, § 1241(a)(2), 130 Stat. 2497.

Annotations

Notes

HISTORY; ANCILLARY LAWS AND DIRECTIVES

Prior law and revision:

Amendment Notes

2006.

2008.

2016.

Other provisions:

Prior law and revision:

EXHIBIT B

1/5/2020

Justice Dept.: Armed Agents Are Allowed to Oversee Ballot-Counting Venues

Lexis® for
Microsoft Office

The New York Times

AdChoices

Justice Dept.: Armed Agents Are Allowed to Oversee Ballot-Counting Venues

Katie Benner 55 mins ago



WASHINGTON — The Justice Department told federal prosecutors in an email early on Wednesday that the law allowed them to send armed federal officers to ballot-counting locations around the country to investigate potential voter fraud, according to three people who described the message.



© Brittany Greason for The New York Times Local police officers pushed back a crowd outside the Detroit Department of Elections as workers counted ballots on Wednesday.

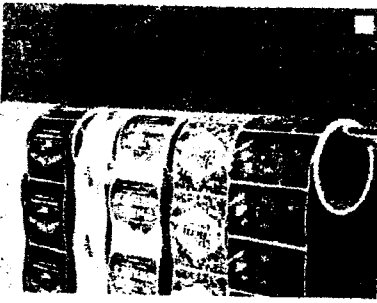
The email created the specter of the federal government intimidating local election officials or otherwise intervening in vote tallying amid calls by President Trump to end the tabulating in states where he was trailing in the presidential race, former officials said.

A law prohibits the stationing of armed federal officers at polls on Election Day. But a top official told prosecutors that the department interpreted the statute to mean that they could send armed federal officers to polling stations and locations where ballots were being counted anytime after that.

The statute "does not prevent armed federal law enforcement persons from responding to, investigate, or prevent federal crimes at closed polling places or at other locations where votes are being counted," the official, Richard P. Donoghue, told prosecutors in an email that he sent around 1:30 a.m. on Wednesday.

11/5/2020

Justice Dept.: Armed Agents Are Allowed to Oversee Ballot-Counting Venues



Roll Labels

Vistaprint

Shop Now

A Justice Department spokeswoman did not respond to a request for comment made before this article was published on Wednesday. A day later, a department official said in defending the email that it was intended only to make clear that federal law enforcement officials were available to help their state and local counterparts and that the department did not plan to send armed agents anywhere.

Mr. Donoghue, the No. 2 official in the office of the deputy attorney general, Jeffrey A. Rosen, sent his email about half an hour before Mr. Trump made reckless claims including falsely declaring himself the winner of the election and began calling for election officials to stop counting ballots.

"We want all voting to stop," Mr. Trump said at the White House. He said, without offering details, that his campaign would "be going to the U.S. Supreme Court" over the

election count. The Trump campaign said later in the day that it was filing lawsuits in multiple states, including Michigan, to halt or protest vote counts.

One state election official vowed to resist any interference or intimidation efforts by federal officials.

"Elections are a state matter, and we have authority as state officials over anyone trying to enter locations where ballots are being counted," said Attorney General Maura Healey of Massachusetts. "Anything else is a radical reinterpretation of the law. States can handle elections, and we will ensure the people decide the outcome."

The election has been both unusual and charged. A historic number of mail-in ballots, prompted by the pandemic, have slowed the work of local election officials who tally them. And Mr. Trump has for months stoked fears about the integrity of the vote and amplified unfounded conspiracy theories that slow-counting states could not be trusted, intensifying his process accusations as the count stretched on past Election Day and his opponent, Joseph R. Biden Jr., gained an edge in many

Attorney General William P. Barr also spent the months leading up to Election Day echoing the president's dark warnings, claiming without evidence that the wave of mail-in ballots would lead to an unprecedented amount of voter fraud.

He cited one example of 1,700 falsified ballots that The Washington Post found to be false. A department spokeswoman blamed an inaccurate memo from an aide.

The new legal interpretation about armed officials at vote-counting locations appeared to be another example of the attorney general mirroring Mr. Trump's public posture, former Justice Department officials said.

"This seems like a messaging tactic for the attorney general," said Vanita Gupta, the acting head of the department's Civil Rights Division under President Barack Obama. "Lawfully, the Justice Department can't interfere in the vote count, enter polling places or take ballots, even in the course of an investigation."

In instances where the department can secure access to ballots for any investigation, Ms. Gupta said that federal law allowed law enforcement officials to "copy and inspect, but that ballots stay in the hands of local election officials."

Justice Department officials said this week that they expected lawyers for the Trump and Biden campaigns to take on court challenges related to the election, and that the Trump administration would have little, if any, role.

Election experts said that any effort by the Justice Department to blatantly interfere in the election would immediately prompt legal challenges. Still, armed officials arriving at ballot-counting locations even for investigatory purposes could intimidate or otherwise disrupt the process, they warned.

10/31/2020

Federal officers sent to Portland by Trump teargassed protesters, despite being told to leave by the mayor and governor



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T.RowePrice

BUSINESS INSIDER

AdChoices

Federal officers sent to Portland by Trump teargassed protesters, despite being told to leave by the mayor and governor

mi.jankowicz@businessinsider.com (Mi Jankowicz) 7/17/2020



News/Twitter Federal officers deploying gas and riot munitions in this video still from local television news media. KOIN News/Twitter

- Federal officers used teargas and riot control munitions on protesters in Portland, Oregon on Thursday, according to multiple local media reports.
- Protests there have continued for almost two months since the death of George Floyd, long after they faded in many other US cities, The Oregonian reported.
- In recent days, President Donald Trump ordered the federal government to intervene, against the wishes of Oregon officials including state governor and Portland's mayor.
- Visit Business Insider's homepage for more stories.

Federal officials clashed with protesters on the streets of Portland, Oregon on Thursday evening, despite strong criticism of their presence from the state governor and the city's mayor.

Protests in response to George Floyd's death have continued for nearly 50 straight days in Portland, The Oregonian reported.

Protesters outside two separate federal buildings were described as boisterous but nonviolent on this occasion by The Oregonian.

cal reporter Jennifer Dowling of KOIN News said in a video dispatch that federal troops used tear gas and riot control munitions against the protesters.

10/31/2020

Federal officers sent to Portland by Trump teargassed protesters, despite being told to leave by the mayor and governor

Federal law enforcement officers used tear gas & flash bangs to disperse the crowd. Dustin Brandon, who has been out every night to protest, explains to @JenDowlingKoin6 how this was worse than what was deployed by Portland Police. #PortlandProtest #Teargas #koin6news

Matt Rashleigh
@Matt_KOIN

Here are more pictures of the federal officers that moved in to disperse the protesters on SW 3rd in downtown #Portland #Oregon .

4:45 AM · Jul 17, 2020

1.4K 1.2K people are Tweeting about this

Authorities had earlier warned protesters to leave, saying they had heard protest chants about burning down one of the federal buildings, KOIN News reported.

State Governor Kate Brown and city Mayor Ted Wheeler — both members of the Democratic party — are among the elected officials who have called on the federal troops to leave the city.

Governor Kate Brown @OregonGovBrown · Jul 16, 2020

This political theater from President Trump has nothing to do with public safety. The President is failing to lead this nation. Now he is deploying federal officers to patrol the streets of Portland in a blatant abuse of power by the federal government.

KATU News @KATUNews

BREAKING: Homeland Security head, Chad Wolf, is in Portland after saying the city is "under siege." bit.ly/32x7L8m

10/31/2020

Federal officers sent to Portland by Trump teargassed protesters, despite being told to leave by the mayor and governor

Governor Kate Brown 
@OregonGovBrown


I told Acting Secretary Wolf that the federal government should remove all federal officers from our streets. His response showed me he is on a mission to provoke confrontation for political purposes. He is putting both Oregonians and local law enforcement officers in harm's way.

7:55 PM · Jul 16, 2020

17.1K 9.3K people are Tweeting about this

Mayor Ted Wheeler 
@tedwheeler

This is clearly a coordinated strategy from the White House. It is irresponsible and it is escalating an already tense situation. Remove your heightened troop presence now.

Brian Bennett  @ByBrianBennett

White House Press Secretary Kayleigh McEnany just called Lori Lightfoot "the derelict mayor of Chicago" and said she should request federal help to secure the city

7:24 PM · Jul 16, 2020

2.6K 2.4K people are Tweeting about this

Hours before the renewed clashes broke out, Homeland Security Acting Secretary Chad Wolf visited the city and harshly criticized local officials and law enforcement, according to the Associated Press (AP).

In a lengthy, bullet-pointed statement, Wolf called the protesters "violent anarchists," alleging multiple episodes of property destruction, violence and graffiti, as an apparent justification the federal officers' tactics.

© Cedar Attanasio/AP Homeland Security Acting Secretary Chad Wolf pictured in April 2020. Cedar Attanasio/AP

He called out local and state leaders for what he termed a "failed response."

"Each night, lawless anarchists destroy and desecrate property, including the federal courthouse, and attack the brave law enforcement officers protecting it," the statement said.

Wolf did not seek a meeting with either Sen. Brown or Mayor Wheeler, The Oregonian reported, and Wheeler told the paper he would not have accepted anyway.

The clashes follow local media reports that federal officers in unmarked vehicles have been seizing protesters.

Oregon Public Broadcasting (OPB) reported, based on personal accounts and social media posts, that this has taken place

Exhibit C

SOLACE and LAC

From: Carol Waldhauser (cwaldhauser@de-lap.org)

To: meghankellyesq@yahoo.com

Cc: emkiesel@aol.com

Date: Monday, May 24, 2021, 11:58 AM EDT

Meghan:

Please find attached a self-explanatory letter.

Please contact us within the next 10 days regarding it.

Thank you.

Carol

Carol P. Waldhauser, Executive Director

The Delaware Lawyers Assistance Program

(DE-LAP)

405 N. King Street, Suite 100B

Wilmington, DE 19801

(302) 777-0124

Cell: (410) 409-8874

cwaldhauser@de-lap.org

www.de-lap.org

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Threatening
10 days

How did they find out. Did the Supreme Court tell them

Lawyers Assistance Program

Carol P. Waldhauser, Executive Director
The Renaissance Centre
405 N. King Street, Suite 100 B
Wilmington, Delaware 19801
cwaldhauser@lap.org

Private: (302) 777-0124
Toll Free: 877-243-3527
Fax: (302) 650-5212
cwaldhauser@lap.org

MAY 24, 2021
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE. 19939

CONFIDENTIAL

Dear Meghan:

We understand that you may be experiencing some financial difficulties with regard to license fees, etc. As a member of the Delaware Bar we care about you. For that reason, we are reaching out, confidentially, to see if we might be able to offer assistance to you.

The Delaware Lawyers Assistance Program, The SOLACE Committee, The Delaware Lawyers Assistance Fund and the Professional Guidance Committee all provide support to attorneys who may need resources for basic needs, as well as referral options as needed or required. Again, these services are free and confidential.

To better understand, how we can assist, we want to meet with you - either virtually - or in person. Do you have WIFI available where we might meet virtually? Or in the alternative, are you able to come in Georgetown to meet? Once again, this is confidential, and we would like to be able to explore our resources and determine if our services can help you.

So please, reach out to us either by e-mail or phone. Our information is: Carol.cwaldhauser@de-lap.org and/or Eleanor can be reached at emkiesel@aol.com, or call Carol at DE-LAP 302-777-0124. We hope that you can connect with us and see if our resources and/or referrals can assist you. Remember, DE-LAP is a Confidential, Free, Non-Judgmental Service Just for Delaware Lawyers and Judges. Equally important, we do together what need not be done alone!

Very truly yours,

Eleanor M. Kiesel
Eleanor M. Kiesel, Esquire, PhD, Lawyers Assistance Committee

Carol P. Waldhauser
Carol Waldhauser, Executive Director, Lawyers Assistance Program (DE-LAP)

Electronically forwarded with encls: meghankelly83@yahoo.com

I believe people
sate hell for
accepting teachers
of mental health employees

Not help just helping
their own gathering
evidence

Never confidential if
in issue, deceit.

Exhibit D

IN THE SUPREME COURT OF THE STATE OF DELAWARE

MEGHAN KELLY,
Plaintiff Below,
Appellant,

v.

DONALD J. TRUMP,
Defendant Below, Appellee.

§
§ No. 119, 2021
§
§ Court Below—Court of
§ Chancery of the State of
§ Delaware
§
§ C.A. No. 2020-0809-PWG
§
§

Submitted: June 8, 2021
Decided: July 7, 2021

Before VAUGHN, TRAYNOR, and MONTGOMERY-REEVES, Justices.

ORDER

After consideration of the opening brief and the record on appeal, it appears to the Court that:

- (1) The appellant, Meghan Kelly, challenges a decision of the Court of Chancery overruling exceptions to a Master’s report that recommended dismissal of her complaint. For the reasons stated below, we affirm, *sua sponte*, the judgment of the Court of Chancery.¹

¹ See DEL. SUPR. CT. R. 25(c) (“After filing of the appellant’s opening brief, a panel of the Court by unanimous action may, *sua sponte*, enter an order or opinion affirming the judgment or order of the trial court for the reason that it is manifest on the face of the appellant’s opening brief that the appeal is without merit . . .”).

Exhibit E

MEGHAN MARIE KELLY, ESQUIRE

.....
34012 Shawnee Drive

Dagsboro, DE 19939

Clerk of the Supreme Court

55 The Green

Dover, DE 19901

**RE: ODC Board Case No. 115327-B (Meghan M. Kelly, Esquire), Objections
lack of subject matter**

November 23, 2021

Dear Clerk:

I intend to file objections to the Office of Disciplinary Counsel's ("ODC's") petition filed on November 4, 2021, with the Board on Professional Responsibility to transfer me to disability inactive based on lack of subject matter jurisdiction.

The evidence will show the Delaware Supreme Court through its members or agents instigated the ODC's proceedings against me which creates manifest prejudice against me, or at least appeared to instigate the ODC's proceedings against me, giving the appearance of lack of partiality, and the inability to grant me a fair trial in the above referenced matter.

In addition, the ODC brought the proceedings against me, unlawfully as applied, in violation of my protected rights under the First Amendment applicable to the ODC pursuant to the Fourteenth Amendment.

This Honorable Court lacks subject matter jurisdiction based on illegality of proceeding.

The Chancery Court lacked jurisdiction to enjoin the ODC since the facts arose in the Chancery and Delaware Supreme Courts, creating the appearance of lack of impartiality or actual partiality.

Thank you.

Very truly,

/s/Meghan Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
No Phone
meghankellyesq@yahoo.com
Bar Number 4968

CC: Office of Disciplinary Counsel Patricia B. Schwartz, by mail and E-mail
Administrative Assistant to the Board on Professional Responsibility by mail

Exhibit F

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939

**Clerk of the Supreme Court
55 The Green
Dover, DE 19901**

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

November 22, 2021

Dear Clerk:

I intend to object to the ODC's attached request for appointment of counsel with regards to the above referenced matter for me on religious grounds, and object to potential costs too. Albeit the letter noted the appointment of an attorney would be "without cost."

Thank you.

Very truly,

/s/Meghan Kelly

Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
No Phone
meghankellyesq@yahoo.com
Bar Number 4968

CC: Office of Disciplinary Counsel Patricia B. Schwartz

Exhibit G

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive

Dagsboro, DE 19939

Administrative assistant to the Board on Professional Responsibility
405 N. King Street, Suite 505
Wilmington, DE 19801

RE: Entitled to Discovery/Reconsideration on counsel/postpone hearing until
counsel determination and discovery is complete including appeals/ ODC Board
Case No. 115327-B (Meghan M. Kelly, Esquire)

December 18, 2021

Dear Board members:

On Thursday, December 16, 2021, I received the Delaware Supreme Court's
order, dated December 13, 2021, regarding the appointment of counsel, despite
notice of my intent to object, attached hereto. On Friday afternoon, December 17,
2021, David Hutt, Esquire emailed me the notice of hearing you sent dated
December 10, 2021.

Please be advised, service was ineffective. I did not receive this through the
mail. I object to the ineffective service to me, and to the appointment of counsel.

I intend to file a motion for reconsideration with the Delaware Supreme
Court on Monday December 20, 2021.

I am entitled to discovery, and would like time to draft interrogatories and
perform other discovery before a hearing is conducted.

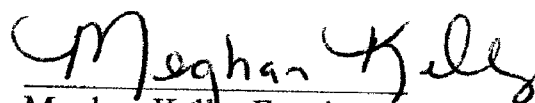
I respectfully request we post pone scheduling hearing until:

1. a final determination is made on my opposition to counsel, and
2. Until discovery is completed.

Please be advised, I immediately told David Hutt, Esquire of my intention to the appointment of counsel per the attached.

Thank you for your kind consideration.

Very truly,



Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
No Phone
meghankellyesq@yahoo.com
Bar Number 4968
(Word Count 270)

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

Dated: December 18, 2021

Meghan Kelly (printed)

Meghan Kelly (signed)

EXHIBIT 1

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive

Dagsboro, DE 19939

Clerk of the Supreme Court

55 The Green

Dover, DE 19901

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

November 22, 2021

Dear Clerk:

I intend to object to the ODC's attached request for appointment of counsel with regards to the above referenced matter for me on religious grounds, and object to potential costs too. Albeit the letter noted the appointment of an attorney would be "without cost."

Thank you.

Very truly,

/s/Meghan Kelly

Meghan Kelly, Esquire

34012 Shawnee Drive

Dagsboro, DE 19939

No Phone

meghankellyesq@yahoo.com

Bar Number 4968

CC: Office of Disciplinary Counsel Patricia B. Schwartz

EXHIBIT 2

12/17/21, 2:44 PM

Yahoo Mail - Re: Board Case NO. 115327-B/Motion for reargument Counsel/

Re: Board Case NO. 115327-B/Motion for reargument Counsel/

From: Meg Kelly (meghankellyesq@yahoo.com)

To: dhutt@morrisjames.com

Cc: meghankellyesq@yahoo.com

Date: Friday, December 17, 2021, 02:43 PM EST

Good afternoon,

Thank you for the message. I do not have any working phone. There is no way to get a hold of me by phone. E-mail, so long as I have internet may be the best way. I am receiving internet through a government program that may end February 18, 2022.

I am in receipt of the letter appointing you as counsel, received yesterday. I intend to file a motion for reargument and an objection to the appointment of counsel on religious grounds, and on due process grounds on Monday. I am pretty shaken up as I gave the court notice of my intent to object.

I will keep you in the loop. I have not drafted anything yet, and will appeal to the US Supreme Court should it be denied.

Thank you for forwarding the attachment relating to a hearing. I must file a motion for an extension of time, or in the alternative, maybe you can until a final determination on reargument relating to counsel.

I intend to be in Georgetown on Monday to hand in my motion for reargument. May I drop off a memory stick of documents to you in an envelop, for you to keep relating to the documents I filed, and Defendants' documents? I hope to get this done by Monday. I have not even started. If for any reason I am unable to hand you a memory stick on Monday, I will email you.

Please note in my answer I objected based on subject matter jurisdiction, and I have a case pending before the 3rd Circuit. (See attached).

I believe people go to hell for a lot of things. So I keep myself separate. I believe mental health and psychologists teach the mark of the beast as fact, conditionally caring based on relationship, reward and avoidance of harm as the goal, without unconditional love, chasing after desires and wants instead of laying down our desires to care to use our conscience mind to choose to do God's will, by critically thinking to care to know, to love.

I am a Christian. The bible teaches let the holy spirit be your advocate when you are taken to court. I should not be forced to go to hell, forced to compromise my belief in Jesus by undergoing examinations I object to, in order to maintain my license to practice law.

Thank you for understanding and I apologize that they appointed you when I do not desire assistance. Either way, we will need an extension of time.

My answer was 100 pages. I objected on subject matter jurisdiction because the Delaware Supreme Court appeared to participate or instigate in the retaliatory proceedings against me. So, the prosecutor must not be the judge and jury too.

I hope you have a nice weekend.

I will provide you with what I file on Monday too. Have a great weekend. Stay healthy and safe.

Very truly,
Meg

On Friday, December 17, 2021, 02:02:53 PM EST, Hutt, David C. <dhutt@morrisjames.com> wrote:

12/17/21, 2:44 PM

Yahoo Mail - Re: Board Case NO. 115327-B/Motion for reargument Counsel

Meghan,

Please see the attached letter with enclosures.

Thanks,

David

Morris James LLP

David C. Hutt | Partner

107 W. Market Street, P.O. Box 690, Georgetown, DE 19947

19339 Coastal Highway, Suite 300, Rehoboth Beach, DE 19971

Phone: 302.856.0018 | Fax: 302.856.7217

morrisjames.com | dhutt@morrisjames.com

[Facebook](#) | [LinkedIn](#) | [Twitter](#)

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object pages dismiss.pdf
408.3kB

Exhibit H

IN THE SUPREME COURT OF THE STATE OF DELAWARE

)	Misc. 541
In the Matter of a Member of the Bar of the)	Board Case No. 115327-B
Supreme Court of the state of Delaware)	
Meghan M. Kelly, respondent.)	

**MEGHAN M. 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**

AND NOW, the 20th day of December, 2021, respondent, Meghan M. Kelly, moves this Court pursuant to *Del. Super. Ct. Civ. R. 59* and *DE R S CT Rule 18* Court for reconsideration of the attached Order dated December 13, 2021, appointing counsel to represent me relating to fundamental rights, predominantly my belief in Jesus Christ, received December 16, 2021. (Ex. 1)

Also attached please find the notice of hearing Counsel received, not me, dated prior to your order, which I object to, as improper service. (Ex.2) (Ex. 3. Includes notice to petitioners, the Board of PR and appointed counsel of my intent to file this motion).

I object to appointment of counsel on religious grounds. I know and can better defend my own religious beliefs better than appointed counsel who does not know me or my relationship with the Lord. God knows my heart better than I do. So, I require you allow God to be my advocate through the holy spirit. I believe Jesus teaches us not to prepare, but allow the holy spirit to be our advocate when

we are wrongly brought to Court based on religious beliefs. See Petition at question 7. (D.I. omitted. I am without a docket). In *Luke* 12:11-12. Jesus teaches “When you are brought before synagogues, rulers and authorities, do not worry about how you will defend yourselves or what you will say, for the Holy Spirit will teach you at that time what you should say.”

If I stand or fall, I stand or fall on my faith in Jesus Christ which is something I will not compromise. An attorney cannot defend my religious beliefs better than God through the holy spirit can.

I respectfully request the Court consider appointing and kindly paying counsel to assist me, in a limited scope, possibly helping me with pleadings and to bounce off ideas, to prevent waste and mistakes, but not taking charge of my case by forced court order, without consent. I requested counsel’s stance and outlined concerns and solutions relating to an appointment of limited assistance, noting solutions to foreseeable concerns. (Ex. 4).

I object to the Court’s premature order on procedural and substantive due process grounds. US Amend. XIV. I was not afforded an opportunity to be heard, to elaborate on my religious objections concerning counsel in this case.

In addition to, or in the alternative of, I argue excusable neglect for any alleged missed deadlines, and must be afforded opportunity to be heard to safeguard my fundamental right to exercise religion, speech, the right to petition

and associate without government retaliation in the form of 1. procedures to take my license to practice law, but for my exercise of fundamental rights, and 2. requiring I violate my religious beliefs, in exchange for defending my license to practice law. I oppose mental health and health care examinations on religious grounds. I am not a commodity to inspect for commercial use by doctors or psychologists. I am a child of God to be respected, not exploited and used for money or material gain to serve what I believe is the beast sin that damns people to hell for hardness of heads and hardness of hearts for cold hard or electronic cash.

I must be afforded an opportunity to be heard to protect my interest in maintaining my license to practice law without being forced, tempted by increased pressure by the state to sell my soul to hell to maintain my license to practice law by potentially undergoing observations or examinations by experts in the health or mental health field. Any neglect in delays is excusable, and slight, compared to the loss of my protected First Amendment rights, property interest in my license and Sixth Amendment right to represent myself. Petitioner filed a letter requesting appointment of counsel. I responded with a letter noting my intent to object to such appointment. I thought the next step would be motions. It has been over six years since I have represented anyone as an attorney. I have limited experience in court predominantly in my youth in Court. I object on Sixth Amendment grounds.

I believe this order rendered, is brought to punish me for my exercise of religious beliefs, the right to petition, speak and associate without government retaliation, despite my unconfirming religious beliefs and poverty in violation of the Equal Protections Clause applicable to the government pursuant to the Fourteenth Amendment, as applied to me in a class of one. See attached Ex. 5 and Ex. 6. Ex. 5 relates to poverty. In this document I note the Delaware Supreme Court's apparent instigation of the petitioner's and agents' retaliation. I am alarmed that Judge Traynor asked for Federal Court jury instructions while I sat in the law library, and by the fact this Court has PACER, granting the law librarian access. (Ex. 7) A PACER representative indicated the state courts did not need PACER. Are you and the judges intending to sue me or help a Court colleague sue me in federal court in retaliation of my first Amendment rights? Did the Delaware Supreme Court or your agents participate in the instigation and retaliation as the evidence indicates I discuss in my answer and attachment and this exhibit? (See Docket Answers and Exhibits thereto including Ex. 2, 3, 4, 5, 6, 7, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 26, 27, 28, 29, 30, 31, 32, 33, 34, and Letter dated December 1, 2021 and exhibits thereto). These questions arguably prevent subject matter jurisdiction by the appearance of partiality and an unfair trial or the guarantee of actual partiality and unfair trial. I hope you do not hurt me for my exercise of fundamental rights because I do not fit the normal mold, and believe


differently. Two Judges scolded me in upper Delaware for merely appearing to be an outsider, an out of stater. Judge Smalls accused me of being a Pennsylvania attorney in my first appearance alone in court ever, and another Judge with the initials starting with S. I forget his name, told me to go back to Pennsylvania after a CLE class because I answered a question during the class, he seemed excited to share. See attached, relating to my concern about prejudice by judges relating to a different CLE Ex.8).

I provided the Court and the petitioners with notice of my intent to object. (Ex. 9). I believe differently than the world believes. I believe many things damn people to hell at the resurrection of the dead from their graves on the last day should they not repent, and keep myself separate from the world by not sinning against God despite people glorifying evil as good.

I was expecting to join my former law firm. (Ex. 10). My father needs a car, and I wanted to give the car he gave me back and use the company car. This case prevents me from working and helping my family, during a global pandemic and a world-wide economic crisis.

WHEREFORE, I pray the Court grants my requests.

Respectfully submitted,


Meghan Kelly, Esquire
34012 Shawnee Drive

Dagsboro, DE 19939
meghankellyesq@yahoo.com
No phone
Bar No. 4968
(Word Count 1,182)

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

Dated: Dec. 20, 2021
Meghan Kelly (printed)

Meghan Kelly (signed)

EXHIBIT 1

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive

Dagsboro, DE 19939

Clerk of the Supreme Court

55 The Green

Dover, DE 19901

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

November 22, 2021

Dear Clerk:

I intend to object to the ODC's attached request for appointment of counsel with regards to the above referenced matter for me on religious grounds, and object to potential costs too. Albeit the letter noted the appointment of an attorney would be "without cost."

Thank you.

Very truly,

/s/Meghan Kelly

Meghan Kelly, Esquire

34012 Shawnee Drive

Dagsboro, DE 19939

No Phone

meghankellyesq@yahoo.com

Bar Number 4968

CC: Office of Disciplinary Counsel Patricia B. Schwartz

EXHIBIT 1

*received Dec. 16, 2021
M.L.*

IN THE SUPREME COURT OF THE STATE OF DELAWARE

IN THE MATTER OF A MEMBER	§
OF THE BAR OF THE SUPREME	§ Misc. 541
COURT OF DELAWARE	§ Board Case No. 115327-B
	§ CONFIDENTIAL
MEGHAN M. KELLY,	§
Respondent.	§

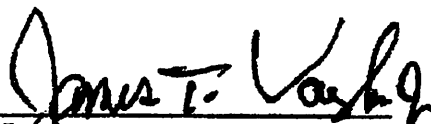
Submitted: November 18, 2021

Decided: December 13, 2021

ORDER

Having considered the Office of Disciplinary Counsel’s request for the appointment of counsel to represent Respondent Meghan M. Kelly pursuant to Rule 19(c) of the Delaware Lawyers’ Rules of Disciplinary Procedure, the request is GRANTED. David C. Hutt, Esquire is appointed to represent Ms. Kelly at no cost to Ms. Kelly.

IT IS SO ORDERED.



 Justice

EXHIBIT 2

Morris James LLP

David C. Hutt
302.856.0018
dhutt@morrisjames.com

December 17, 2021

VIA: U.S. 1st CLASS MAIL & EMAIL (meghankellyesq@yahoo.com)

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

RE: *In the Matter of a Member of the Bar of the Supreme Court of Delaware vs.
Meghan M. Kelly*
Board Case No. 115327-B

Dear Ms. Kelly:

I am pleased to report that I have been appointed to represent you with regard to the above-referenced Supreme Court proceedings (Court Order enclosed). Please contact me immediately so that we can discuss the proceedings. Please provide my office with the best address for all correspondence and with a working phone number and email address.

There is a hearing scheduled in this matter on Thursday, January 13, 2022 (Notice of Hearing enclosed). Please note that I may need to request that this hearing be rescheduled due to existing commitments on my calendar. We can discuss the schedule in more detail when we review this matter together.

I look forward to working on this matter with you. Again, I ask you to please contact my assistant, Shelly Thomas at 302-752-3307 immediately, to provide (confirm) contact information and to schedule a meeting to discuss this matter.

Very Truly Yours,

MORRIS JAMES LLP


David C. Hutt

Enclosures

BOARD ON PROFESSIONAL RESPONSIBILITY
OF THE
SUPREME COURT OF DELAWARE

IN THE MATTER OF A
MEMBER OF THE BAR OF
THE SUPREME COURT OF
DELAWARE:
MEGHAN M. KELLY,
RESPONDENT.

§
§
§
§
§
§

CONFIDENTIAL

Board Case No. 115327-B

To: Meghan M. Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19901

Patricia B. Schwartz, Esquire
Office of Disciplinary Counsel
405 N. King Street, Suite 420
Wilmington, DE 19801

NOTICE OF HEARING

The hearing in connection with the above-captioned case has been scheduled for:

Thursday, January 13, 2022 at 9:30 a.m. via Zoom before: Nicole M. Faries, Esquire, (Chair), Andrew A. Lundgren, Esquire and John D. Shevock. An email with the Zoom link will be sent separately.

By copy of this notice, I am forwarding to the Board panel the Petition for Discipline filed by the Office of Disciplinary Counsel and Respondent's Answer to the Petition for Discipline.

The respondent is entitled to be represented by a lawyer, who will be entitled to cross-examine witnesses and to present evidence on respondent's behalf. At respondent's written request, the Clerk of the Delaware Supreme Court will compel by subpoena the attendance of witnesses and the production of pertinent books, papers and documents.

/s/ Karlis Johnson

Karlis Johnson
Administrative Assistant to the Board on
Professional Responsibility
405 N. King Street, Suite 505
Wilmington, DE 19801

Date of Notice: December 10, 2021

cc: Michael A. Barlow, Esquire
Chair, Board on Professional Responsibility
Nicole M. Faries, Esquire (w/enclosure)
Andrew A. Lundgren, Esquire (w/enclosure)
John D. Shevock, MSM, FACHE, FACMPE (w/enclosure)
Lexitas

EXHIBIT 3

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939

Administrative assistant to the Board on Professional Responsibility
405 N. King Street, Suite 505
Wilmington, DE 19801

**RE: Entitled to Discovery/Reconsideration on counsel/postpone hearing until
counsel determination and discovery is complete including appeals/ ODC Board
Case No. 115327-B (Meghan M. Kelly, Esquire)**

December 18, 2021

Dear Board members:

On Thursday, December 16, 2021, I received the Delaware Supreme Court's order, dated December 13, 2021, regarding the appointment of counsel, despite notice of my intent to object, attached hereto. On Friday afternoon, December 17, 2021, David Hutt, Esquire emailed me the notice of hearing you sent dated December 10, 2021.

Please be advised, service was ineffective. I did not receive this through the mail. I object to the ineffective service to me, and to the appointment of counsel.

I intend to file a motion for reconsideration with the Delaware Supreme Court on Monday December 20, 2021.

I am entitled to discovery, and would like time to draft interrogatories and perform other discovery before a hearing is conducted.

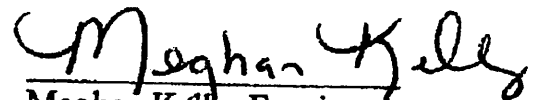
I respectfully request we post pone scheduling hearing until:

1. a final determination is made on my opposition to counsel, and
2. Until discovery is completed.

Please be advised, I immediately told David Hutt, Esquire of my intention to the appointment of counsel per the attached.

Thank you for your kind consideration.

Very truly,



Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
No Phone
meghankellyesq@yahoo.com
Bar Number 4968
(Word Count 270)

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

Dated: December 18, 2021

Meghan Kelly (printed)

Meghan Kelly (signed)

EXHIBIT 2

12/17/21, 2:44 PM

Yahoo Mail - Re: Board Case NO. 115327-B/Motion for reargument Counsel/

Re: Board Case NO. 115327-B/Motion for reargument Counsel/

From: Meg Kelly (meghankellyesq@yahoo.com)

To: dhutt@morrisjames.com

Cc: meghankellyesq@yahoo.com

Date: Friday, December 17, 2021, 02:43 PM EST

Good afternoon,

Thank you for the message. I do not have any working phone. There is no way to get a hold of me by phone. E-mail, so long as I have internet may be the best way. I am receiving internet through a government program that may end February 18, 2022.

I am in receipt of the letter appointing you as counsel, received yesterday. I intend to file a motion for reargument and an objection to the appointment of counsel on religious grounds, and on due process grounds on Monday. I am pretty shaken up as I gave the court notice of my intent to object.

I will keep you in the loop. I have not drafted anything yet, and will appeal to the US Supreme Court should it be denied.

Thank you for forwarding the attachment relating to a hearing. I must file a motion for an extension of time, or in the alternative, maybe you can until a final determination on reargument relating to counsel.

I intend to be in Georgetown on Monday to hand in my motion for reargument. May I drop off a memory stick of documents to you in an envelop, for you to keep relating to the documents I filed, and Defendants' documents? I hope to get this done by Monday. I have not even started. If for any reason I am unable to hand you a memory stick on Monday, I will email you.

Please note in my answer I objected based on subject matter jurisdiction, and I have a case pending before the 3rd Circuit. (See attached).

I believe people go to hell for a lot of things. So I keep myself separate. I believe mental health and psychologists teach the mark of the beast as fact, conditionally caring based on relationship, reward and avoidance of harm as the goal, without unconditional love, chasing after desires and wants instead of laying down our desires to care to use our conscience mind to choose to do God's will, by critically thinking to care to know, to love.

I am a Christian. The bible teaches let the holy spirit be your advocate when you are taken to court. I should not be forced to go to hell, forced to compromise my belief in Jesus by undergoing examinations I object to, in order to maintain my license to practice law.

Thank you for understanding and I apologize that they appointed you when I do not desire assistance. Either way, we will need an extension of time.

My answer was 100 pages. I objected on subject matter jurisdiction because the Delaware Supreme Court appeared to participate or instigate in the retaliatory proceedings against me. So, the prosecutor must not be the judge and jury too.

I hope you have a nice weekend.

I will provide you with what I file on Monday too. Have a great weekend. Stay healthy and safe.

Very truly,
Meg

On Friday, December 17, 2021, 02:02:53 PM EST, Hutt, David C. <dhutt@morrisjames.com> wrote:

12/17/21, 2:44 PM

Yahoo Mail - Re: Board Case NO. 115327-B/Motion for reargument Counsel

Meghan,

Please see the attached letter with enclosures.

Thanks,

David

Morris James LLP

David C. Hutt | Partner

107 W. Market Street, P.O. Box 690, Georgetown, DE 19947

19339 Coastal Highway, Suite 300, Rehoboth Beach, DE 19971

Phone: 302.856.0018 | Fax: 302.856.7217

morrisjames.com | dhutt@morrisjames.com

[Facebook](#) | [LinkedIn](#) | [Twitter](#)

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object pages dismiss.pdf
408.3kB

EXHIBIT 4

Resending attachment did not make it/21-115-327 B/Limiting scope of representation/using the term assistance not representation/MK has not accepted representation at this time

**From: Meg Kelly (meghankellyesq@yahoo.com)
To: dhutt@morrisjames.com
Cc: meghankellyesq@yahoo.com
Date: Sunday, December 19, 2021, 03:46 PM EST**

Hi David,

Thank you for the email. I apologize for the delay.

What is your position if I ask the court to allow you to assist me, but not take control of the case? Meaning the Court could pay you through the state for helping me, but not controlling the case.

It is my religious belief doing the right thing matters more than winning and losing, and I am not willing to compromise my religious beliefs to get the desired outcome in this case. Lawyers in control usually determine the means to obtain the desired outcome, not the client.

I imagine you may say I prefer not, but you will honor the court's order if approved?

David, there is court misconduct you likely are not aware of. Discovery needs to be done. It is not popular for you and may compromise your work in the future should you confront to possibly correct those you have a duty to serve, the courts. Limiting the scope of your representation, to assisting me with ideas, pleadings and review of my work or assistance will protect my religious liberties and protect you from backlash.

Yes, I faced emotional distress and many tears with horror at your appointment. Yet, the Petitions are seeking to label me as mentally disabled and dangerous for my religious-political beliefs. Petition at 7.

Besides government agent misconduct, government incited misconduct occurred. Someone talked about shooting me for my religious beliefs, my stickers on my car. Cute old ladies reached over to give me the middle finger. An out of state man, a stranger got in my face, took off his mask and started yelling me for assuming I supported Biden, potentially exposing me to sickness and death with covid. I drafted the attached articles of impeachment and contacted all 541 law makers concerning them. I may be on the radar of powerful people who find me a threat to their unjust control and gain, by preserving Constitutional freedoms.

I am in danger of government sponsored persecution for my religious, associated and political beliefs and speech exacerbated by this petition and the effects a negative determination would have should this not be dismissed based on subject matter. The state finds my belief in Jesus, my religious beliefs offensive and crazy, seeking to declare me mentally disabled but for my personal religious beliefs. They appoint you for their own convenience and declare my beliefs and speech dangerous to the public. I seek to protect the public from government abuse and lawless unconstitutional overreach.

I have not represented another in over 6 years, and that was settlements not in court. I am no danger, but they place me in danger. I cannot lose my 6th amendment right to self-representation by force, but must preserve and not waive my right, my voice. I hope you understand.

Since they seek to wrongly declare me mentally disabled but for my religious beliefs, they seek to force counsel upon me, for their convenience, not to help me. It is better to have no counsel than to lose my right to self-representation by forced court order, despite my objection.

However, I am poor and have limited means to conduct research, print paper and may lose internet on February 18, 2021, when EBB may be cancelled, internet for poor people. I do not have a phone. I have limited means to pay for gas to go to the law library to make calls. It would aid the court if you e-filed on my behalf with my permission at times, communicated with them by phone, as I emailed you.

It would aid me and the court for assistance by having you, a colleague, not counsel in this case, indicating I have bad ideas to prevent waste and to present other options. Should the Court grant such limited scope of assistance, I would waive attorney client privilege and waive claims against you for limited assistance to prevent malpractice concerns. I would sign the forms you require to protect your medical malpractice insurance, and you have permission to declare this in open despite the alleged confidential nature of this action. The Confidential requirements do not protect but endanger me. I desire an open court for my safety, and the safety of the public. So they may freely exercise fundamental rights without hidden, secret government retaliation, whose outcome is made public and final if the petitioners win. Confidentially is unjust, and insulting too, to declare someone who thinks and believes different than the conditioned, trained, conformed force fed thought as mentally disabled. I have the mind of Christ, not the world. Citing 1 Corinthians 2:16.

What is your position if I seek the court pay you to assist me limiting the scope of assistance, while maintaining the right to self-representation in this case? I think the term assistance as opposed to representation should be used.

Please think about it. The Court may very well grant me a hearing on this matter. I should ask the petitioners their stance, but it is Sunday. A motion must be drafted and filed tomorrow, or it is waived should the Superior Court Rules apply as the law librarian suggested.

Though I think the Superior Court procedural rules 21-11 apply to the Board filings, not Supreme Court filings. Either way, it is not worth risking error should I be wrong by missing a deadline. 14 days DE Supreme Court verses 5 days Board decisions.

Thank you for your concerns about protecting attorney client communications and privileges. I have not yet accepted your representation at this time. Obviously, as the court ordered you to represent me despite notice of my objection. And you have notice of my intent to file a motion concerning such forced appointment of counsel.

Allow me to contest the appointment and take time to think about it. You do not need to email me back immediately. You may even wait to see what the court says. You are off the hook for now in my eyes, and the court cannot hold you accountable given my motion to be drafted and filed tomorrow.

Thank you,
Meg



Exhibit 7 to App F Five separate articles of impeachment to impeach President Trump Petitioner drafted and sent to congress.pdf
3.9MB

EFiled: Sep 22 2020 12:57PM
Transaction ID 65953103
Case No. 2020-0809-



EXHIBIT

7

**SAVE FREE
SPEECH
ARTICLE OF
IMPEACHMET**

§ 227. Wrongfully influencing a private entity's employment..., 18 USCA § 227

United States Code Annotated

Title 18. Crimes and Criminal Procedure (Refs & Annos)

Part I. Crimes (Refs & Annos)

Chapter 11. Bribery, Graft, and Conflicts of Interest (Refs & Annos)

18 U.S.C.A. § 227

§ 227. Wrongfully influencing a private entity's employment decisions by a Member of Congress or an officer or employee of the legislative or executive branch

Effective: April 4, 2012

Currentness

(a) Whoever, being a covered government person, with the intent to influence, solely on the basis of partisan political affiliation, an employment decision or employment practice of any private entity--

(1) takes or withholds, or offers or threatens to take or withhold, an official act, or

(2) influences, or offers or threatens to influence, the official act of another,

shall be fined under this title or imprisoned for not more than 15 years, or both, and may be disqualified from holding any office of honor, trust, or profit under the United States.

(b) In this section, the term "covered government person" means--

(1) a Senator or Representative in, or a Delegate or Resident Commissioner to, the Congress;

(2) an employee of either House of Congress; or

(3) the President, Vice President, an employee of the United States Postal Service or the Postal Regulatory Commission, or any other executive branch employee (as such term is defined under section 2105 of title 5, United States Code).

CREDIT(S)

September 23, 2016

Coastal Point

35

IRSD: Bracelets at high school just a joke in 'poor taste'

Parents told they shouldn't be concerned

By Laura Walter
Staff Reporter

Indian River School District officials said this week that the blue bracelets making their way around Indian River High School on Sept. 19 were nothing more than a bad joke.

Several students were distributing blue rubber bracelets printed with the words "Kill yourself" and a swastika, ac-

ording to district officials.

"I think there were three kids who ordered these things — like 200 of them. I think they were trying to be funny," said IRSD Assistant Superintendent Mark Steele.

The students reportedly dispersed bracelets to other classmates. Counselors and administrative staff members then spent several hours collecting the bracelets back. They also met with the students involved and their parents, Steele said.

"We wanted to make sure there was nothing deeper here than just a couple

kids making a dumb mistake," he said.

There was "absolutely no meaning to it at all," Steele asserted, noting that the counselors spoke with the teenagers, just to be sure. Most students laughed it off as they turned the bracelets in, Steele said, and the day ended well.

"We don't have anything parents should be concerned about," he added. "They got afraid of it pretty quickly. I would refer to it as a poor-taste joke."

It can be frustrating for schools trying to promote a safe atmosphere, since "schools try to do everything possible, and then you just get companies that'll

print anything," Steele said.

However, counselors are there for any student having trouble or feeling depressed.

"If there's anything there, anybody feels the need to talk to a counselor — by all means, talk to a counselor." Parents with questions or concerns are being encouraged to call their student's principal or an assistant principal.

Online resources are available by visiting www.irsd.net/home, selecting the "Parents and Students" tab, and clicking "Bullying and Suicide Prevention Resources."

DSP Explorers program to hold open house Sept. 27 at Central

The Delaware State Police Explorers program consists of young men and women who have an interest in law enforcement.

The group participates in fingerprinting young children at community events; works the missing children's area at the State Fair; and many more community events. They also offer opportunities for the National Law Enforcement Exploring Conference and the Federal Leadership Academies, as

well as the Delaware State Police Cadet Program.

The Explorers program teaches a variety of police procedures, including fingerprinting, evidence collection and patrol procedures.

"We strive to lead them down the right path and stand as positive role models. We also plan to instill leadership, responsibility, integrity and commitment," DSP representatives noted.

Every Explorer Post is overseen and

run by Delaware State Police troopers.

Minimum qualifications include a 2.0 grade point average, and Explorers must be mature, clean-cut, as well as clean-shaven, with no criminal convictions. This is not a discipline program. The age range is 14 to 20 and at least in ninth grade. The program consists of high school and college students.

Open houses for the program are planned at DSP troops statewide this month, with the

Troop 4 (Georgetown) and Troop 7 (Lewes) at 6 p.m. on Tuesday, Sept. 27, at Sussex Central High School in Georgetown.

All interested students should be prepared to submit a \$50 program registration fee at the open house. Checks or cash are accepted. They will also need a copy of last year's grades. For those younger than 18,

Dining

Continued

vegetables, and seven

Guest Column

Kelly: Chilling free speech is not cool

By Meghan Kelly, Candidate
Delaware House of Representatives,
38th District

My name is Meghan Kelly. I am an attorney running for the House of Representatives in the 38th District's Tuesday, Nov. 6, 2018, election.

As I candidate for a state position, I have witnessed people in positions of authority misuse their authority to unconstitutionally chill the freedom of political speech. This is no small matter. An attorney can sue people to correct such chilling of 1st Amendment rights, but what will that do? They can take all of their possessions and money. None of that — not all the money in the world — is worth as much as the freedoms we have here in our nation.

Men fought wars for the freedoms we all hold dear. More money cannot buy their lives back. Men did not die for money. The American dream is not about finding a job, buying a home, providing for and raising a family. People all over the world aspire for that.

The American dream is much more than merely making money, providing for your family and surviving. What

makes the United States of America the dream of so many is Americans' universal respect of other people's freedoms when they step foot on our land.

What makes America great is the people. What makes America great is Americans' universal respect for the freedoms of speech, assembly, religion and association, regardless of race, religion or place of origin.

When people in positions of authority choose not to behave like Americans by respecting the rights of others (emphasis intended), that is when America becomes less great. And yet, I have hope and faith that the people will courageously and kindly confront such behavior with correction, not with more bad behavior.

I am writing about one instance where my freedom of speech was quashed. I attended a celebration for a town. When I arrived beforehand, someone working the event said they knew who I was and talked politics, demeaning my party. I attempted to respond to the discussions, but the mayor and other agents of the Town requested that I didn't.

I told the mayor his request was unconstitutional, but I complied. I was instructed by those with the blanket of

authority not to discuss politics at the party. They mentioned the other candidate could not attend.

A couple hours later, I attended the Town's party at the town hall — open to the public, thereby creating a limited public forum. Solicitors of various groups sat with pamphlets, including a church, at the celebration. I did not ask for a table or a place to sit with those handing out materials. I merely desired to respond to political statements and questions.

Yet, I complied with the mayor's request, making it clear that such request was not constitutional.

The mayor's position of authority made his personal requests to refrain from exercising American freedoms more dangerous than a normal citizen.

We all have limits to our freedom of speech, but people in government, and those with authority, have even more limits in exchange for such power, to preserve the freedoms of those they serve. Otherwise, unconstitutional government restraints may inhibit the freedoms of those they serve, by causing fear of persecution.

The constitutional rights and standards differ relating to the type of

See KELLY page A15

Kelly

Continued from page A14

forum where the speech is limited. Is it a private forum, public or limited public forum? Municipalities may use their police power to draft reasonable regulations for the public safety relating to private property. However, private property that is opened up to the public is converted to a limited public forum, where content based speech is not easily limited.

In 1980, the U.S. Supreme Court held that a large shopping store could not limit the freedom of speech, regardless of how disagreeable the speech was to the owner of the grocery store, under the facts of that case. In that case, a private forum was opened up to the public during certain hours, just like many stores are opened to the public. Thus it became a limited public forum where speech is under greater protection than a private forum.

My speech was quashed on public property, opened up to the public for a public event.

The constitutional standards differ not only with regards to the forum, where the freedom of speech may have been infringed upon, but it also differs concerning whether it was restrained by conduct-based restrictions or content-based restrictions.

Conduct-based speech may be limited in a limited public forum by time, place and manner restrictions under a relatively easier standard than the content-based restrictions. Content-neutral restrictions must advance important interests unrelated to the suppression of speech, and must not burden substantially more speech than necessary to further those interests.

In 2010, our Third Circuit ruled that was unconstitutional for a mall to discriminate against noncommercial speech in favor of commercial speech, as this was content-based not content-neutral speech.

Content-based restrictions are presumptively unconstitutional. The government must prove such restriction is necessary to serve a compelling state interest, and is narrowly drawn to achieve that end. Mere open debate

concerning political speech does not meet that standard. The freedom to speak freely about politics and other important issues, such as religion, without persecution of the government, is why many people desire to come to America.

There are limits to our freedom of speech, such as false advertising, defamation and obscenity.

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

I keep thinking to myself, men died for this freedom. No amount of money or power is as precious as those men's lives, and the freedoms they bravely fought for. If men are willing to die and kill for this, I should have the courage to confront and correct people in authority so as to honor those men, and to remind the world that they mattered, and to protect what they fought for, not money, but freedom. You can't buy that. It is priceless.

Thank you for honoring our brave

by honoring the freedoms they fought for, including the freedom of speech.

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Lunch Special

September 23, 2016

Coastal Point

IRSD: Bracelets at high school just a joke in 'poor taste'

Parents told they shouldn't be concerned

By Laura Walter
Staff Reporter

Indian River School District officials said this week that the blue bracelets making their way around Indian River High School on Sept. 19 were nothing more than a bad joke.

Several students were distributing blue rubber bracelets printed with the words "Kill yourself" and a swastika, ac-

ording to district officials.

"I think there were three kids who ordered these things — like 200 of them. I think they were trying to be funny," said IRSD Assistant Superintendent Mark Steele.

The students reportedly dispersed bracelets to other classmates. Counselors and administrative staff members then spent several hours collecting the bracelets back. They also met with the students involved and their parents, Steele said.

"We wanted to make sure there was nothing deeper here than just a couple

kids making a dumb mistake," he said.

There was "absolutely no meaning to it at all," Steele asserted, noting that the counselors spoke with the teenagers, just to be sure. Most students laughed it off as they turned the bracelets in, Steele said, and the day ended well.

"We don't have anything parents should be concerned about," he added. "They got ahead of it pretty quickly. I would refer to it as a poor-taste joke."

It can be frustrating for schools trying to promote a safe atmosphere, since schools try to do everything possible, and then you just get companies that'll

print anything," Steele said.

However, counselors are there for any student having trouble or feeling depressed.

"If there's anything there, anybody feels the need to talk to a counselor — by all means, talk to a counselor," Parents with questions or concerns are being encouraged to call their student's principal or an assistant principal.

Online resources are available by visiting www.irsd.net/home, selecting the "Parents and Students" tab and clicking "Bullying and Suicide Prevention Resources."

DSP Explorers program to hold open house Sept. 27 at Central

The Delaware State Police Explorers program consists of young men and women who have an interest in law enforcement.

The group participates in fingerprinting young children at community events, works the missing children's area at the State Fair, and many more community events. They also offer opportunities for the National Law Enforcement Exploring Conference and the Federal Leadership Academies, as

well as the Delaware State Police Cadet Program.

The Explorers program teaches a variety of police procedures, including fingerprinting, evidence collection and patrol procedures.

"We strive to lead them down the right path and stand as positive role models. We also plan to instill leadership, responsibility, integrity and commitment," DSP representatives noted.

Every Explorer Post is overseen and

run by Delaware State Police troopers.

Minimum qualifications include a 2.0 grade point average, and Explorers must be mature, clean-cut, as well as clean-shaven, with no criminal convictions. This is not a discipline program. The age range is 14 to 20 and at least in ninth grade. The program consists of high school and college students.

Open houses for the program are planned at DSP troops statewide this month, with the

Troop 4 (Georgetown) and Troop 7 (Lewes) at 6 p.m. on Tuesday, Sept. 27, at Sussex Central High School in Georgetown.

All interested students should be prepared to submit a \$50 program registration fee at the open house. Checks or cash are accepted. They will also need a copy of last year's grades. For those younger than 17, a

Dining

Continued from

vegetables, and seven

116 TH CONGRESS

1 ST SESSION

Impeaching Donald J. Trump, President of the United States, of high crimes and misdemeanors.

_____, 2019
submitted the following resolution; which was referred to the _____

Impeaching Donald J. Trump, President of the United States, of high crimes and misdemeanors.

RESOLUTION

Resolved, That Donald J. Trump,

President of the United States, is impeached for high crimes and misdemeanors, and that the following Articles of Impeachment to be exhibited to the Senate:

Articles of Impeachment to be exhibited by the House of Representatives of the United States of America in the name of itself and all of the people of the United States of America, against Donald J. Trump, President of the United States, in maintenance and support of its impeachment against him for high crimes and misdemeanors.

ARTICLE I

THE PRESIDENT'S VIOLATION OF CRIMINAL LAW PURSUANT TO TITLE 18 OF THE UNITED STATES CODE, SECTION 227

In his conduct while President of the United States, Donald J. Trump (herein also referred to as "President" or "Trump"), in violation of his constitutional oath to faithfully execute the office of President of the United States and, to the best of his ability, preserve, protect, defend and obey the Constitution of the United States, as well as his constitutional

obligation to preserve, protect, defend and obey the laws of the land, including the Federal Criminal Statute 18 U.S.C.A. § 227.

No one is above the law. No one is below the law.

Not even the President of the United States is free to willfully violate criminal laws without Constitutional justification.

The President by his words and/or deeds violated the criminal law Title 18 of the United States Code, Section 227.

Pursuant to 18 U.S.C.A. § 227,

"(a) Whoever, being a covered government person, with the intent to influence, solely on the basis of partisan political affiliation, an employment decision or employment practice of any private entity--

(1) takes or withholds, or offers or threatens to take or withhold, an official act, or

(2) influences, or offers or threatens to influence, the official act of another,

shall be fined under this title or imprisoned for not more than 15 years, or both, and may be disqualified from holding any office of honor, trust, or profit under the United States.

(b) In this section, the term "covered government person" means--

(1) a Senator or Representative in, or a Delegate or Resident Commissioner to, the Congress;

(2) an employee of either House of Congress; or

(3) the President, Vice President, an employee of the United States Postal Service or the Postal Regulatory Commission, or any other executive branch employee (as such term is defined under section 2105 of title 5, United States Code)."

The President is specifically listed as a "covered government person" under this criminal law under 18 U.S.C.A. § 227(a), (b)(3).

The President withheld an "official act" to faithfully defend and protect the NFL Players' Constitutional freedom of speech against government persecution, as required under this statute.

The President not only "withheld an official act" to defend, protect and

obey the United States Constitution by defending the NFL Players' protected first amendment freedom, he also violated NFL Players' freedom from government persecution by actively persecuting, ridiculing and, or encouraging the ridicule and firing of the NFL players, and or the boycott of certain teams based solely on the Players' perceived, projected or manufactured political affiliation against Trump and/or Trump's base or alleged American political values. Citing, 18 U.S.C.A. § 227(a)(1).

The President's withholding of such official act and active violation of the same was made with "the intent to influence, solely on the basis of the perceived or projected partisan political affiliation of NFL players derived from their peaceful protest, an employment decision or employment practice of" private entities, NFL teams. Citing, 18 U.S.C.A. § 227 (a).

The President also, "influence(d), or offer(ed) or threaten(ed) to influence, the official acts of," others in his staff, government agents, troops, service men and women, and congressmen and congresswomen, as well as all Americans, when he encouraged others to persecute, ridicule, demean, or boycott the NFL players and teams for exercising their freedom of speech. Citing, 18 U.S.C.A. § 227 (a)(2).

The President's encouragement was made with "the intent to influence, solely on the basis of the perceived, or projected partisan political affiliation, against President Trump and/or his supporters and/or American values, an employment decision or employment practice of" private entities, NFL teams. Citing, 18 U.S.C.A. § 227 (a).

In September 2017 and thereafter, President Trump called for NFL Players, (herein also referred to as "NFL" and "Players"), to be fired for speech exhibited by kneeling during the national anthem before NFL football games to peacefully protest against the government's disparate mistreatment against black Americans in the criminal justice system and the government's use of lethal force against black Americans, including unarmed children (herein also referred to as "protest(s)" or "peaceful protest(s)").¹

¹ (See, *The Tennessean*, part of the USA Today Network, President Trump: NFL teams should fire players who protest national anthem, By Natalie Allison and Joel Ebert, Sept. 22, 2017, <https://www.tennessean.com/story/news/2017/09/22/president-trump-nfl-teams-fire-players-protest-national-anthem/695666001/>; also see, *The Washington Post*, Roger Goodell responds to Trump's call to fire, By, Jeremy Gottlieb Sept. 22, 2017, https://www.washingtonpost.com/news/early-lead/wp/2017/09/22/donald-trump-profanely-implores-nfl-owners-to-fire-players-protesting-national-anthem/?utm_term=.f6156e8f2075).

Certain NFL Players (also referred to as "Players" or "NFL") knesled during the National anthem at football games to protest, in part, various individual policemen's shootings, killings and murders of unarmed black Americans, including black American children.

The conduct was not an attack on all police.

The peaceful protest was made, in part, against individual bad choices by individual policemen that cost the families, the community and our country the lives of little American children and Americans.

The peaceful protest was made to prevent future needless deaths of Black Americans and, including innocent children.

Our Constitution protects life, liberty and pursuit of happiness of all people, even little black children.

Trump gained support by those who became fearful, defensive and combative in response to the NFL player's peaceful protest.

Those people failed to recognize the peaceful nature of the protest.

Trump gained support of people who did not recognize the protest was not against police, whites, America, Trump or other people. The protest was made, in part, to show that the black Americans who died were worthy of love and life, and that no black American's life should be wrongfully taken.

The color of the American's skin does not make their deaths less tragic, and yet, there has been a surge of police ^{g attacks against} more black Americans than other Americans killed unlawfully by government agents.

The black lives matter movement was created to show America that those black lives do matter. People of all colors are worthy of love and respect, and are inherently "created equal" in the eyes of our constitution.

Throughout the nation, we have seen attacks against the black lives matters movement with the all lives matter movement, the police lives matters movement, white lives matter movement and other movements, all of which are constitutionally protected.

Nevertheless, the nongovernment attacks against the peaceful protests and black lives matter movement have helped Trump gain support.

The teenagers gave them to Black kids in response to the Black lives matters bracelets.

Trump wants to win.

Trump recognizes he gains more support by attacking the peaceful Constitutionally protected protest of the NFL Players.

Trump's conduct was made solely on the "basis of partisan political affiliation" attributed to the NFL players peaceful protest by Trump and specific part of the base that supports Trump.

In September of 2016, at Indian River High School located in Delaware, teenagers brought in about 200 bracelets with the words "Kill yourself" next to a Nazi symbol.²

Such speech is not protected speech.

The use of violence by Neo Nazis, KKK, white supremacists and other people is unprotected.

The authority of a policeman's badge, or a military or national guard position cannot convert such violence into protected activity.

The peaceful protest by the NFL players is a beautiful Constitutionally protected way to protect innocent people against unconstitutional unprotected government speech and violent acts.

The NFL's peaceful protest is Constitutionally protected.

President Trump's speech persecuting, ridiculing the NFL players is not Constitutionally protected speech.

President Trump disobeyed the Constitution in order to garner more political support.

President Trump's behavior was based solely on serving himself by attributing the NFL player's peaceful protest to a partisan political affiliation against America and troops, despite the fact the freedom to peacefully protest is one the freedoms our beloved troops fought so bravely to preserve and defend.

The President not only violated the NFL Players first Amendment right of

² See Coastal Point, IRSD : Bracelets at high school just a joke in poor taste, By Laura Walter, September 23, 2016.

speech, he also violated their perceived or projected freedom of association against the President and or his views.

~~Americans are more free to speak and share our views without fear of persecution by the government because of the First Amendment.~~

~~Americans are more free to speak and share our unique views without fear of persecution by the government.~~

Americans are free to protest despite their perceived or projected partisan political affiliation against the government.

What makes America great is Americans' universal respect for the freedom of speech, assembly, religion and association regardless of race, religion or place of origin.

The Players' first amendment freedom of speech affords them protection from government persecution for exercising their first amendment right to peacefully protest against government conduct.

Pursuant to the Supreme Court in McDonald v. Smith, 472 U.S. 479, 486-87, 105 S. Ct. 2787, 2791-92, Citing New York Times Co. v. Sullivan, 376 U.S. 254, 270, 84 S. Ct. 710, 721, 11 L. Ed. 2d 686 (1964),

"The first amendment specifically protects speech against government acts and decisions citizens may disagree with. As with the freedoms of speech and press, exercise of the right to petition "may well include vehement, caustic, and sometimes unpleasantly sharp attacks on government and public officials," and the occasionally "erroneous statement is inevitable." New York Times Co. v. Sullivan, supra, 376 U.S., at 270-271, 84 S.Ct., at 720-721. The First Amendment requires that we extend substantial " 'breathing space' " to such expression, because a rule imposing liability whenever a statement was accidentally or negligently incorrect would "487 intolerably chill "would-be critics of official conduct ... from voicing their criticism." 376 U.S., at 272, 279, 84 S.Ct., at 721, 725.1"

When Trump accepted a position of government authority, under our Constitution, his Constitutional rights became more limited in order to uphold the Constitutional rights of those he serves, the American people.

The Constitution limits the power of the government in order to safeguard the freedom of those who reside in America.

Trump, as president, may not unconstitutional chill the NFL Players' speech based on perceived, projected political affiliation of the players based on

their protest.

The freedom of speech gives Americans the freedom to voice their disagreement with government actions and ideas, including the right to protest against government violence towards black Americans by government agents, and the right to protest the disparate treatment of black Americans by some specific instances of individual conduct while acting under the cloak of government authority including specific attorney generals, police and judges.

The United States Supreme Court held, "Criticism of (a government official) conduct does not lose its constitutional protection merely because it is effective criticism and hence diminishes their official reputations." New York Times Co. v. Sullivan, 376 U.S. 254, 272-73, 84 S. Ct. 710, 722, 11 L. Ed. 2d 686 (1964).

Trump is the President of the United States.

Trump represents through his deeds and words, the government in the executive branch.

The Government through Trump's deeds and words unconstitutionally persecuted the NFL Players for exercising their first amendment freedom.

Trump violated his oath to uphold the Constitution by actively disobeying the Constitution by persecuting the NFL Players for exercising their Constitutional right to peacefully protest.

Trump intended to cause the threat of economic harm to the NFL teams and against the players who participated in the peaceful protest.

Trump has called for the firing of NFL players for protesting.

Trump encouraged fans to walk out of a game if a player protested during the anthem.

Trump encouraged fans not to purchase NFL tickets when NFL players chose to kneel.

Trump has called for the boycott of the purchase of their teams' NFL tickets.

Trump caused economic damage, including but not limited to cancelled ticket sales, lost profit at concession stands and related NFL affiliated businesses, lost ratings on TV and, or other economic harm.

Trump's words and deeds chilled the NFL Players' protected speech.

Trump said "Wouldn't you love to see one of these NFL owners, when somebody disrespects our flag, to say, 'Get that son of a b--- off the field right now. Out. He's fired. He's fired!'" Id.

Trump stated "You know, some owner's going to do that," Trump continued. "He's going to say, 'That guy who disrespects our flag, he's fired.'" Id.

Trump stated, "But you know what's hurting the game more than that?" Trump said. "When people like yourselves turn on television and you see those people taking the knee when they are playing our great national anthem." Id.

Trump stated "The only thing you could do better is if you see it, even if it's one player, leave the stadium, I guarantee things will stop. Things will stop. Just pick up and leave. Pick up and leave. Not the same game anymore anyway." Id.

"The NFL policy says a club will be fined if team members on the field during the anthem do not stand, and that the commissioner 'will impose appropriate discipline on league personnel who do not stand and show respect for the flag and the anthem.'"³

"During Thursday's games, however, a few NFL players knelt during the anthem. Others raised their fists during the song or remained in the locker room." Id.

"The NFL said in a statement ...that it has agreed with the NFL Players Association to delay implementing work rules that could result in players being disciplined while discussions between the league and the union on issues around the anthem continue." Id.

On Aug. 10, 2018, the President tweeted, "The NFL players are at it again - taking a knee when they should be standing proudly for the National Anthem. Numerous players, from different teams, wanted to show their "outrage" at something that most of them are unable to define. They make a fortune doing what they love....." Id.

On August 10, 2018, the President also tweeted, ".....Be happy, be cool! A football game, that fans are paying soooo much money to watch and enjoy,

³ (Citing, ABC News, Trump blasts NFL players for kneeling during anthem: 'Stand proudly ... or be suspended without pay, By Kelsey Walsh August 10, 2018, <https://abcnews.go.com/Politics/trump-blasts-nfl-players-kneeling-national-anthem-suspended/story?id=57131857>)

is no place to protest. Most of that money goes to the players anyway. Find another way to protest. Stand proudly for your National Anthem or be Suspended Without Pay!" Id.

The President is misleading the nation as to what makes America great. It is not money and wealth, but freedoms that make America already great.

Men fought wars for the freedoms we all hold dear, including the freedom to peacefully protest. Mere money cannot buy their lives back. Men did not die for money.

The American dream is not about finding a job, buying a home, providing for and raising a family. People all over the world aspire for that.

The American dream is much more than merely making money, providing for your family and surviving. What makes the United States of America the dream of so many is Americans' universal respect of other people's freedoms when they step foot on our land.

What makes America great is the people. What makes America great is Americans' universal respect for the freedoms of speech, assembly, religion and association, regardless of race, religion or place of origin.

The freedom to speak freely about politics and other important issues such as religion, without persecution of the government, is why many people desire to come to America.

When people in positions of government authority choose not to behave like Americans by respecting the *rights of others* (emphasis intended), that is when America becomes less great.

Trump made America less great by chilling the exercise of freedoms of those he serves Americans, including the NFL players,

"After the NFL first announced the new policy in May, Trump told Fox & Friends that players who don't stand during the anthem 'shouldn't be playing' and maybe 'shouldn't be in the country.'" Id.

The President's words chilled the NFL Players speech, and possibly other Americans to under the threat of economic persecution.

The lower Federal Courts recognize economic persecution as a form of government persecution. ¹

On May 24, 2018, The President tweeted, ""You have to stand proudly for the National Anthem. You shouldn't be playing, you shouldn't be there.

Maybe they shouldn't be in the country...the NFL owners did the right thing" Id.

On Oct. 18, 2017, the President Trump tweeted, "The NFL has decided that it will not force players to stand for the playing of our National Anthem. Total disrespect for our great country!"⁴

"President Donald Trump praised an NFL policy banning kneeling during the 'The Star-Spangled Banner,' saying that 'maybe you shouldn't be in the country' if you don't stand for the anthem"⁵

In all of this, Donald J. Trump has violated the First Amendment freedom of speech against government persecution by willfully and knowingly persecuting those who exercised their freedom, Donald J. Trump.

In all of this, the President knowingly and willfully spoke and acted in a manner that violated the criminal law Title 18 of the United States Annotated Section 227.

In so doing he has undermined the integrity of his office, by violating federal criminal law and the freedoms under the Constitution, and brought disrepute on the Presidency, and betrayed his trust as President in a manner subversive of constitutional government, to the great prejudice of the cause of law and justice and to the manifest injury of the people of the United States.

Wherefore Donald J. Trump, by such conduct, warrants impeachment and trial, and removal from office ~~wherefore Donald J. Trump, by such conduct, warrants impeachment and trial, and removal from office.~~

⁴ The cases are limited to immigration cases, but the criminal statute Title 18 of the United States Code Annotated Section 227 extends government persecution by the President of the United States to economic persecution too. I applaud this branch of government for choosing to create a check on themselves and another branch of government.

⁵ Citing, Associated Press, Trump suggests NFL players who kneel shouldn't be in US, By May 24, 2018, <http://www.msn.com/en-us/sports/nfl/trump-lauds-nfl-policy-banning-kneeling-for-national-anthem/ar-AAxJHSz>).

**PREVENT WORLD
WAR 3
ARTICLE OF
IMPEACHMENT
MEG DRAFT A
COMPLETE DRAFT**

Begin forwarded message:

From: Meghan Kelly <electmegkelly@icloud.com>
Date: 1/28/2020
To: us@iusticedemocrats.com
Subject: Fwd: Impeachment articles and related docs by Meg Kelly

Please help!

Sent from my iPhone

Begin forwarded message:

From: Meghan Kelly <electmegkelly@icloud.com>
Date: January 5, 2020 at 8:15:50 PM EST
To: Meghan Kelly <electmegkelly@icloud.com>
Cc: League of Women Voters of De Of Women Voters Of Delaware <lwvde@comcast.net>, darin.mccann@coastalpoint.com, Jane Hovington <jehovahrohi@aol.com>, Glenn Rolphe <groffe@newszap.com>, president@duq.edu, mbraden@bakerlaw.com, Mckayla Braden <mckayla.braden@gmail.com>, wchandler@wsqr.com, Stacie.burton@yahoo.com, house.jdems@mail.house.gov, mckayla.braden@gmail.com, arlet.adrahamian@mail.house.gov, michael.pender@mail.house.gov, tyrone.hankerson@mail.house.gov, janice.bashford@mail.house.gov, zoe.orrick@mail.house.gov, zoe.orrick@mail.house.gov, carrick.heliferty@mail.house.gov, lieu.staff@mail.house.gov, andrea.anaya@mail.house.gov, sophie.bodlovich@mail.house.gov, brittan.robinson@mail.house.gov, alysa.buckler@mail.house.gov, brian.garcia2@mail.house.gov, Joe Neguse <emma.salas@mail.house.gov>, matthewkosiorek@comcast.net, Lucy Mcbeth <matthew.golden@mail.house.gov>, anneliese.israel@mail.house.gov, Veronica Escobar <jaqueline.sanchez@mail.house.gov>, Doug Collins <sebastian.wigley@mail.house.gov>, steve.chabot@mail.house.gov, caralee.conklin@mail.house.gov, phi0ima@mail.house.gov, brittany.yanick@mail.house.gov, caleb.culver@mail.house.gov, luke.mcknight@mail.house.gov, dawn.mcarble@mail.house.gov, hayden.hayes@mail.house.gov, kate.laborde@mail.house.gov, steve.koncar@house.mail.gov, john.zwaanstra@mail.house.gov, kyle.rush@mail.house.gov, rep.bendine@mail.house.gov, reginald.darby@mail.house.gov
Subject: Re: Impeachment articles and related docs by Meg Kelly

Good evening,

Attached, I started drafting another set of articles, but I am making you finish it.

I am disappointed in all of you for placing your interest above your duties, by focusing on your seats instead of serving the country. You must impeach on a second article and

impeach again, as needed. Combat lawlessness with the rule of law. Do not exploit it to serve yourselves.

Also attached, please find a couple of articles relating to war crimes. Get your shit together and serve your country. You have the power to prevent global war. You have the power to reflect humility and respect for the lives and property and intrinsic value of other human beings. This humility and act of peace can reconcile relations and prevent bloodshed.

Do not play games with our brave troops' lives to serve your own vanity. Shame on Trump and shame on you if you fail to act swiftly. Perfection NOT required. True leadership is.

Serve your country, not your seat. Impeach.

I expect no less.

**Good night.
Meg Kelly, Esq.**

cutting and pasting in case you choose not to open it.

116 TH CONGRESS

1ST SESSION

Impeaching Donald J. Trump, President of the United States, of high crimes and misdemeanors.

_____, 2019

_____ submitted the following resolution; which was referred to the

**Impeaching Donald J. Trump, President of the United
States, of high crimes and misdemeanors.**

RESOLUTION

Resolved, That Donald J. Trump,

President of the United States, is impeached for high crimes and misdemeanors, and that the following Articles of Impeachment to be exhibited to the Senate:

Articles of Impeachment to be exhibited by the House of Representatives of the United States of America in the name of itself and all of the people of the United States of America, against Donald J. Trump, President of the United States, in maintenance and support of its impeachment against him for high crimes and misdemeanors.

ARTICLE I

THE PRESIDENT'S VIOLATION OF OATH OF OFFICE, PERJURY BY FAILING TO UPHOLD THE CONSTITUTION, AND LAWS OF THE LAND, INCLUDING THE ARTICLE II WARS POWERS ACT OF 1973

In his conduct while President of the United States, Donald J. Trump (herein also referred to as "President" or "Trump"), in violation of his constitutional oath to faithfully execute the office of President of the United States and, to the best of his ability, preserve, protect, defend and obey the Constitution of the United States, as well as his constitutional obligation to preserve, protect, defend and obey the laws of the land:

The President swore an oath to uphold the Constitutional laws, Federal laws, and international agreements.

The President has a duty to review, inform himself of such laws, in order to uphold the Constitution,

The President's ignorance is not innocence.

Ignoring the laws is not a defense in the President's violation of his oath of office to uphold the same.

No one is above the law. No one is below the law.

Not even the President of the United States is free to violate the law.

The President committed perjury by violating his oath to uphold the Constitution and Laws of the land by encouraging violation of the same under his policies at the border.

18 U.S.C.A. § 1621 provides:

"Whoever--

(1) having taken an oath before a competent tribunal, officer, or person, in any case in which a law of the United States authorizes an oath to be administered, that he will testify, declare, depose, or certify truly, or that any written testimony, declaration, deposition, or certificate by him subscribed, is true, willfully and contrary to such oath states or subscribes any material matter which he does not believe to be true; or

(2) in any declaration, certificate, verification, or statement under penalty of perjury as permitted under section 1746 of title 28, United States Code, willfully subscribes as true any material matter which he does not believe to be true; is guilty of perjury and shall, except as otherwise expressly provided by law, be fined under this title or imprisoned not more than five years, or both. This section is applicable whether the statement or subscription is made within or without the United States."

The President, through his policies relating to the strike that killed General Soleiman violated, Federal Law and/or International treaties and Law.

ARTICLE II WARS POWERS ACT OF 1973

~~On or about January 2019, President trump ordered~~

~~The President failed to give Congress notice within 48 hours of the strike.~~

A "Requirement of War Powers Resolution that President report to Congress within 48 hours if United States armed forces have been introduced into hostilities or imminent hostilities and that, 60 days after report is submitted or required to be submitted, President shall terminate use of armed forces unless Congress declares war or enacts specific authorization for use of armed forces or extends 60-day period for an additional 30 days does not contemplate court-ordered withdrawal when no report is filed, but rather, leaves open possibility for court to order that report be filed or, alternatively, withdrawal 60 days after report was filed or required to be filed by court or Congress." Citing, *Crockett v. Reagan*, 558 F. Supp. 893 (D.D.C. 1982), *aff'd*, 720 F.2d 1355 (D.C. Cir. 1983), War Powers Resolution, §§ 2-9, 50 U.S.C.A. §§ 1541-1548; U.S.C.A. Const. Art. 1, § 8, cl. 11.

ARTICLE II WARS POWERS ACT OF 1973

**ARTICLE III VIOLATION OF INTERNATIONAL LAW
BY WAR CRIMES**

The Strike destroyed

In all of this, Donald J. Trump has undermined the integrity of his office, by violating federal and international criminal law and the Constitution, and brought disrepute on the Presidency, and betrayed his trust as President in a manner subversive of constitutional government, to the great prejudice of the cause of law and justice and to the manifest injury of the people of the United States.

Wherefore Donald J. Trump, by such conduct, warrants impeachment and trial, and removal from office.

On January 5, 2020 at 1:00 PM, Meghan Kelly <electmegkelly@icloud.com> wrote:

Hi folks,

I sent you 4 separate articles of impeachment to swiftly impeach on while the senate tries the first articles.

Please prevent world war 3 and draft another set now to protect our troops from dying for trump's vanity.
Impeach on a new set on the following articles

1. Perjury not upholding his oath
2. Unauthorized use of force
3. International war crimes

Perfection not required. Swift leadership is. Do not be misled by hacked likes, false mob rule. Lead, do not be misled. Serve your country not yourself by focusing on seats.

Save our troops lives before it is too late and they kill and die for Trump's mere fancies.

God help us help them.

Good day.
Meg

Sent from my iPhone

On Aug 7, 2019, at 6:03 PM, Meghan Kelly <electmegkelly@icloud.com> wrote:

Attached, and below, please find an email list of the contact for each of the 41 Reps on the judiciary committee considering impeachment who provided an email contact.

You may be able to contact the members by their contact info on the web site at this link below too

Please work together united as Americans to serve your country.
<https://judiciary.house.gov/about/members>

Please feel free to give me a call on my cell regardless of your support at 302-727-2079. Thank you. Have a great night.

1. Chair, Hon Rep. Nadler. house.idems@mail.house.gov Char
2. [REDACTED] Rep Mary Gay Scanlan. (Please forward message to her for consideration)
3. Rep. Zoe Lofren ariet.adrahamian@mail.house.gov
4. Rep. Sheila Jackson Lee michael.gender@mail.house.gov
5. [REDACTED] Rep. Steve Cohen (Please forward message to him for consideration)
6. Rep. Henry C. Johnson tyrone.hankerson@mail.house.gov
7. [REDACTED] Rep Ted. Deutch (Please forward message to him for consideration)
8. Rep. Karen Bass. janice.bashford@mail.house.gov
9. [REDACTED] Rep Cedric Richmond (Please forward message to him for consideration)
10. Rep. Hakeem S. Jaffries zoe.orick@mail.house.gov
11. [REDACTED] Rep Eric Swalwell (Please forward message to him for consideration)
12. Rep. David N Cidline Carrick.heiferty@mail.house.gov
13. Rep. Red Lieu lieu.staff@mail.house.gov Sophie is the contact
14. Hon Rep Jamie Raskin andrea.anava@mail.house.gov
15. Hon Rep. Pramila Jayapal sophe.bodlovich@mail.house.gov
16. Hon Rep. Val Butler brittan.robinson@mail.house.gov
17. Hon J. Luis alysa.buckler@mail.house.gov
18. Rep. Sylvia brian.garcia2@mail.house.gov
19. Joe Neguse emma.salas@mail.house.gov
20. Lucy Mcbeth matthew.golden@mail.house.gov
21. Greg Stanton laura.munozlopez@mail.house.gov
22. Rep Madeliene Dean anneliese.israel@mail.house.gov
23. Debbie Mucarsel jessica.valdes@mail.house.gov
24. Veronica Escobar Jaqueline.sanches@mail.house.gov
25. Doug Collins Sebastian.wigley@mail.house.gov
26. [REDACTED] Rep Sensebrenner
27. Rep. Steve Chabot Steve.chabot@mail.house.gov
28. Rep. Louie Gohmert caralee.conkline@mail
29. Rep. Jim Jordan ohi@ima@mail.house.gov
30. Rep Ken Buck brittany.vanick@mail.house.gov
31. Rep John Ratcliffe caleb.culver@mail.house.gov
32. Rep. Martha Roby luke.mcknight@mail.house.gov

- 33. Rep Matt Gaetz dawn.mcarble@mail.house.gov
- 34. Rep Mike Johnson hayden.haves@mail.house.gov
- 35. Rep Andy Biggs kate.laborde@mail.house.gov
- 36. Rep Tom McClintock steve.koncar@mail.house.gov
- 37. Rep Debbie Lesko john.zwaanstra@mail.house.gov
- 38. Rep. Guy Reschenthaler kyle.rush@mail.house.gov
- 39. Rep. Ben Cline rep.bendline@mail.house.gov
- 40. 40. ~~Rep. Kelly/Armstrong (Please forward message to him for consideration)~~

Rep Greg Stuebe reginald.darby@mail.house.gov

On August 7, 2019 at 2:52 PM, Meghan Kelly <electmegkelly@icloud.com> wrote:

Good afternoon,

This is Meg Kelly, Esq., an attorney from Delaware.

I am resending the three articles of impeachment, and related documents, I emailed yesterday to 34 of the 41 members on the House judiciary committee since not all members received it.

In addition, attached, please find additional documents relating to kidnapping, false imprisonment and perjury, excluded on the email I sent yesterday.

Per my teleconference:

Game plan:

Impeach on 5 (five) separate articles of impeachment presented separately to protect

1. Freedom of speech, the NFL article of impeachment relating to the attached criminal law, 18 USC section 227
2. Freedom of the press under criminal law, 18 USC section 227
3. Due process violations at the border. While the Supreme Court allows detention during deportation hearings, the conditions at the border are so heinous that they should be considered punishment without procedural due process under the 5th amendment. Argue substantive due process if you want. The border policies of the President also violate the crimes of kidnapping under 28 USCA section 1201 and false imprisonment under federal common law.

4 obstruction of justice. Please continue your work on this

5 porn star impeachment no further investigations needed.

Porn star impeachment crimes

26 USCA 7206

26 USCA 7202

26 USCA 7201

26 USCA 7207

No investigations needed the porn star payoffs and two checks from improper accounts are enough circumstantial evidence to deem the president guilty of these crimes without further records. You can pull the records, but he delays strategically. His sister was a Federal Judge in my circuit, the third circuit. The President knows what he is doing. In addition, the President has much experience with law suits. I looked up 1000 plus cases related to Trump at the law library. He may the law better than an attorney with all his court experience. (had to laugh, better than crying)

The records are not necessary.

You *win* by doing the right thing, upholding the laws that grant us the freedoms we all hold dear. Without them we are not free.

Stand united together as Americans to serve your country not your seat. Impeach.

Lawlessness must be combated with the impartial rule of law via impeachment, not exploited to win elections at the country's expense.

Please act swiftly.

Perfection not required.

Leadership is required.

Different times require different measures. The 400 failed attempt to impeach Clinton will not work against President Trump.

Please serve your country. Do not exploit the President's lawlessness to serve election seats at the expense of the country. We have everything to lose, especially since elections will likely be hacked.

Thank you♥

Please feel free to call me on my cell if you have any questions.

Have a good night.

Thank you and best regards,

Meg Kelly, Esq.

Licensed DE, DC, PA, US Supreme Court

34012 Shawnee Drive

Dagsboro, DE 19939

(302)727-2079

Begin forwarded message:

From: Meghan Kelly <electmegkelly@icloud.com>

Date: 8/7/2019

To: Meghan Kelly <electmegkelly@icloud.com>
Subject: Impeachment articles and related docs by Meg Kelly

**SAVE THE PRESS
ARTICLE OF
IMPEACHMENT**

§ 227. Wrongfully influencing a private entity's employment..., 18 USCA § 227

United States Code Annotated

Title 18. Crimes and Criminal Procedure (Refs & Annos)

Part I. Crimes (Refs & Annos)

Chapter 11. Bribery, Graft, and Conflicts of Interest (Refs & Annos)

18 U.S.C.A. § 227

§ 227. Wrongfully influencing a private entity's employment decisions by a Member of Congress or an officer or employee of the legislative or executive branch

Effective: April 4, 2012

Currentness

(a) Whoever, being a covered government person, with the intent to influence, solely on the basis of partisan political affiliation, an employment decision or employment practice of any private entity--

(1) takes or withholds, or offers or threatens to take or withhold, an official act, or

(2) influences, or offers or threatens to influence, the official act of another,

shall be fined under this title or imprisoned for not more than 15 years, or both; and may be disqualified from holding any office of honor, trust, or profit under the United States.

(b) In this section, the term "covered government person" means--

(1) a Senator or Representative in, or a Delegate or Resident Commissioner to, the Congress;

(2) an employee of either House of Congress; or

(3) the President, Vice President, an employee of the United States Postal Service or the Postal Regulatory Commission, or any other executive branch employee (as such term is defined under section 2105 of title 5, United States Code).

CREDIT(S)

116 TH CONGRESS

1ST SESSION

Impeaching Donald J. Trump, President of the United States, of high crimes and misdemeanors.

_____, 2019
submitted the following resolution; which was referred
to the _____

Impeaching Donald J. Trump, President of the United States, of high crimes and misdemeanors.

RESOLUTION

Resolved, That Donald J. Trump,

President of the United States, is impeached for high crimes and misdemeanors, and that the following Articles of Impeachment to be exhibited to the Senate:

Articles of Impeachment to be exhibited by the House of Representatives of the United States of America in the name of itself and all of the people of the United States of America, against Donald J. Trump, President of the United States, in maintenance and support of its impeachment against him for high crimes and misdemeanors.

ARTICLE I

THE PRESIDENT'S VIOLATION OF CRIMINAL LAW PURSUANT TO TITLE 18 OF THE UNITED STATES CODE, SECTION 227

In his conduct while President of the United States, Donald J. Trump (herein also referred to as "President" or "Trump"), in violation of his constitutional oath to faithfully execute the office of President of the United States and, to the best of his ability, preserve, protect, defend and obey the Constitution of the United States, as well as his constitutional

obligation to preserve, protect, defend and obey the laws of the land, including the Federal Criminal Statute 18 U.S.C.A. § 227.

No one is above the law. No one is below the law.

Not even the President of the United States is free to willfully violate criminal laws without Constitutional justification.

The President by his words and/or deeds violated the criminal law Title 18 of the United States Code, Section 227.

Pursuant to 18 U.S.C.A. § 227,

"(a) Whoever, being a covered government person, with the intent to influence, solely on the basis of partisan political affiliation, an employment decision or employment practice of any private entity--

(1) takes or withholds, or offers or threatens to take or withhold, an official act, or

(2) influences, or offers or threatens to influence, the official act of another,

shall be fined under this title or imprisoned for not more than 15 years, or both, and may be disqualified from holding any office of honor, trust, or profit under the United States.

(b) In this section, the term "covered government person" means--

(1) a Senator or Representative in, or a Delegate or Resident Commissioner to, the Congress;

(2) an employee of either House of Congress; or

(3) the President, Vice President, an employee of the United States Postal Service or the Postal Regulatory Commission, or any other executive branch employee (as such term is defined under section 2105 of title 5, United States Code)."

The President is specifically listed as a "covered government person" under this criminal law under 18 U.S.C.A. § 227(a), (b)(3).

The President withheld an "official act" to faithfully defend and protect the Press's Constitutional freedom of the press from government persecution, as required under this statute.

The President not only "withheld an official act" to defend, protect and

obey the United States Constitution by failing to defend the Press's protected first amendment freedom, he also violated the Press's freedom from government persecution by actively persecuting, ridiculing and, or encouraging the ridicule and boycott of certain news sources, and or outlets based solely on the news reporter's and/or station or paper's (herein also referred to as the "Press," above and below, collectively or individually) perceived, projected or manufactured political affiliation against Trump and/or Trump's base or alleged American political values. Citing, 18 U.S.C.A. § 227(a)(1).

The President's withholding of such official act and active violation of the same was made with "the intent to influence," solely on the basis of the perceived or projected partisan political affiliation of news reporter(s) and/or station(s) or paper(s), "an employment decision or employment practice of private" entities, news outlet(s) (also referred herein as the "news"). Citing, 18 U.S.C.A. § 227 (a).

The President also, "influence(d), or offer(ed) or threaten(ed) to influence, the official acts of," others in his staff, government agents, troops, service men and women, and congressmen and congresswomen, as well as all Americans, when he encouraged others to persecute, ridicule, demean, and/or boycott the Press for exercising their freedom of the press. Citing, 18 U.S.C.A. § 227 (a)(2).

The President's encouragement was made with "the intent to influence, solely on the basis of the perceived, or projected partisan political affiliation, against President Trump and/or his supporters and/or American values, an employment decision or employment practice of" private entities, the news outlets. Citing, 18 U.S.C.A. § 227 (a).

Trump persuading some Americans to boycott the news based on his comments, including, but not limited comments to, such as "fake news" about the Press.

Trump gained support by those who chose to remain uninformed concerning the news.

Trump offered an excuse some Americans adopted for their decision not to be concerned with the world beyond their own community.

Trump eliminated the guilt of people who chose not to inform themselves by the news.

Trump encouraged ignorance, ignoring news concerning others, and

indifference, an atmosphere of unconcern for people outside of our own.

With the busyness of life, it took away the guilt of many citizens for their decision to remain uninformed.

Trump offered an excuse to feel smart for not watching, reading or listening to the news.

In fact, part of American society began to say those who watched the news and read the papers were foolish or not smart.

Throughout the nation, we have seen an unusual trend of people repeating the President's comment, "fake news."

This trend caused droppings in ratings and ending of subscriptions of the Press based on the President's comments.

This "fake news" trend has helped Trump gain support by those who reject or refuse to listen, read or watch certain news.

Trump wants to win.

Trump recognizes he gains more support by attacking sources part of his base refuse to watch, read or listen to.

Trump's comments were made solely on the "basis of partisan political affiliation" attributed to the Press for exercising their Constitutional freedom of the Press.

The President also intended "to cause an employment decision or employment practice of (a) private entity" by his persecution of the Press

1. to garner more favorable news from the Press,
2. and/or to prevent/chill the news from reporting on certain disfavorable news concerning himself, his policies and information relating to evidence and facts concerning political views, (chilling the Press's freedom of the Press and freedom of speech),
3. and or to diminish the reputation of the news to force them to state information in a light more favorable towards the President.

The President desires more favorable news by the Press to help him win.

The President claims he likes winning.

Winning is not most important. Doing the right thing is more important

than winning.

Violating the rules of law to win is not winning. It is cheating and destroying the laws that safeguard our freedoms that make our country already great.

America is a nation of laws, including Constitutional laws that uphold the freedom of the American citizens against persecution by the government, for lawfully exercising their freedoms.

Lawlessness is the problem. Lawlessness is not the solution. The impartial and fair administration of the rule of law is the solution.

The President's speech persecuting the Press is not protected speech.

The Press is Constitutionally protected.

The Press's freedom of speech is also Constitutionally protected.

President Trump's speech persecuting, threatening and ridiculing the Press for exercising their freedom of the Press and freedom of speech (herein referred to as "speech") is not Constitutionally protected speech.

Trump's speech is lawless violating both Constitutional law and Criminal law.

President Trump disobeyed the Constitution by persecuting, instead of protecting the Press, in order to garner and/or keep political support for the President.

The President violated the criminal law 18 USCA section 227 and the Constitutional laws safeguarding the freedom of the Press, as described herein, in an attempt to "keep winning."¹

President Trump's behavior was based solely on serving himself by attributing to the Press a partisan political affiliation against America, against Trump and/or against Trump's base.

The President's violations of the first Amendment freedom of the Press created unsafe conditions for members of the Press.

The President did not display any concern about the safety of the Press or the foreseeable violent persecution against them based on some supporters' loyalty towards the President.

¹ CBS News clip found at (<https://www.youtube.com/watch?v=ol54UPdNdhE>) (Published, Jun 20, 2018).

The President's persecution, ridicule, demeaning and disparaging of the Press has led some supporters of the President to foreseeably, violently persecute and attempt to kill members of the Press in the United States of America, in an apparent defense of the President.

The President's persecution has led some Americans through his misleadership, to persecute the Press by words and deeds, exacerbating the chilling effect, and the mass threat of persecution to members of the Press by words or deeds.

In February 2019, Journalist Andrew Resticcia's article pointed out, "(m)ore than 24 hours after news broke that a Coast Guard officer — an avowed white nationalist — was allegedly plotting to kill Democratic politicians and journalists, Trump has, at least so far, not said a word."²

"It's irresponsible and dangerous," said Alexandra Ellerbeck, the North America program coordinator at the Committee to Protect Journalists. "When we talk to journalists, they feel less safe than they used to." Id.

"Scarborough and others have noted that news of the alleged plot to kill Democratic politicians and journalists broke just hours after New York Times publisher A.G. Sulzberger chastised Trump for calling the Times the "enemy of the American people" after it published an account of the president's efforts to undercut the investigations encircling him." Id.

"The phrase 'enemy of the people' is not just false, it's dangerous. It has an ugly history of being wielded by dictators and tyrants who sought to control public information. And it is particularly reckless coming from someone whose office gives him broad powers to fight or imprison the nation's enemies," Sulzberger wrote. "As I have repeatedly told President Trump face to face, there are mounting signs that this incendiary rhetoric is encouraging threats and violence against journalists at home and abroad." Id.

"Since 2016, Acosta has become one of the press corps' most high-profile (Press) members, regularly sparring with administration officials, such as Sanders and White House senior policy adviser Stephen Miller. For Trump — who repeatedly vents his anger at the press and CNN in particular — Acosta is a convenient foil. But the reporter's bulldog

² Politico, Trump stays silent on media-hating Coast Guard office, By Andrew Resticcia, dated February, 21, 2019, <https://www.politico.com/story/2019/02/21/trump-coast-guard-officer-1179749>. Also see, The Hill, Trump declares New York Times 'enemy of the people', By Bret Samuels, February 20, 2019.

reporting style has made him a household name.”³

The White House suspended Mr. Acosta’s Press credentials. *Id.*

Mr. Acosta said, “I probably receive more death threats than I can count, ... ‘I get them basically once a week.’” *Id.*

The First Amendment freedom of the Press against government persecution protects the Press from speech by the President, and those who work or serve under the cloak of government authority, from government persecution for their exercise of their first Amendment freedoms.

Government persecution, persecution by the President, mis-leads some Americans as a command to obey and persecute those the President persecutes too.

The President has more limited freedoms in exchange for his position of government authority. He may not misuse his authority by violating the Constitution to voice his opposition and active persecution to any American who thinks differently.

The President is creating a threat of physical danger to the Press.

He has failed to safeguard, uphold, and defend the Press, and their Constitutional freedom.

The President failed to speak up and defend and safeguard the Press when members were attacked and or killed.

A journalist “Khashoggi was murdered on October 2, 2018, sometime after he entered the Saudi consulate in Istanbul, Turkey. A kill squad of Saudi agents carried out the operation, cutting the journalists body into pieces with a bone saw. Saudi leaders initially denied knowing the whereabouts of Khashoggi, but after intense international backlash, finally admitted that he had been killed inside the diplomatic facility.”⁴

³ Washington Post, How CNN’s Jim Acosta became the reporter Trump loves to hate, By Kyle Swenson, Dated November 8, 2018,

[https://www.washingtonpost.com/nation/2018/11/08/how-cnns-jim-acosta-became-reporter-trump-loves-hate/?hpid=hp_hp-top-table-main-trump-press%3Aacosta%3Ahomepage%2Ft&utm_term=.ef2ec2711731](https://www.washingtonpost.com/nation/2018/11/08/how-cnns-jim-acosta-became-reporter-trump-loves-hate/?hpid=hp_hp-top-table-main-trump-press%3Aacosta%3Ahomepage%2Ft&hpid=hp_hp-top-table-main-trump-press%3Aacosta%3Ahomepage%2Ft)

⁴ Newsweek, Trump Defends Saudi Arabia’s Murder of Journalist Jamal Khashoggi by Saying Iran Kills People Too, By Jason Lemon, Dated June 23, 2019, <https://www.newsweek.com/trump-defends-saudi-arabia-jamal-khashoggi-iran-kills-people-1445430>

Also see, New York Times, One Killing. Two Accounts: What We Know About Jamal Khashoggi’s Death, By Ben Hubbard, Oct. 20, 2018, <https://www.nytimes.com/2018/10/20/world/middleeast/khashoggi-turkey-saudi->

“(A) fter intelligence investigations strongly suggested that Saudi Arabia's Crown Prince Mohammed Bin Salman was likely behind the murder of Khashoggi, Trump insisted the kingdom was a 'great ally.' He also criticized Iran, saying the U.S. relied on the Saudis to counter the Persian Gulf nation, buy American weapons and keep oil prices low.” Id.

In June 28, 2018, a gunman shot and killed five journalists at a newspaper office in Annapolis Maryland, the Capitol. ⁵

The threat of violence as a means to force suppression, chill, the Press's publication of unfavorable content is real.

The President encourages such lawlessness by his words and deeds.

The President not only violated the Press's first Amendment freedom of the Press, he also violated their first Amendment freedom of speech.

The Press's first amendment freedoms of the Press and speech affords them protection from government persecution for exercising their first amendment right to speak negatively about government conduct.

Pursuant to the Supreme Court in McDonald v. Smith, 472 U.S. 479, 486-87, 105 S. Ct. 2787, 2791-92, Citing New York Times Co. v. Sullivan, 376 U.S. 254, 270, 84 S. Ct. 710, 721, 11 L. Ed. 2d 686 (1964),

“The first amendment specifically protects speech against government acts and decisions citizens may disagree with. As with the freedoms of speech and press, exercise of the right to petition “may well include vehement, caustic, and sometimes unpleasantly sharp attacks on government and public officials,” and the occasionally “erroneous statement is inevitable.” New York Times Co. v. Sullivan, supra, 376 U.S., at 270-271, 84 S.Ct., at 720-721. The First Amendment requires that we extend substantial ““breathing space” ” to such expression, because a rule imposing liability whenever a statement was accidentally or negligently incorrect would *487 intolerably chill “would-be critics of official conduct ... from voicing their criticism.” 376 U.S., at 272, 279, 84 S.Ct., at 721, 725.1”

narratives.html

⁵ Citing, NBC News, Capital Gazette shooting: Suspect charged after 5 killed at Maryland newspaper, By Phil Helsel, Tom Winter and Jonathan Dienst, June 28, 2018, Updated June 29, 2018

<https://www.nbcnews.com/news/us-news/multiple-people-reported-shot-maryland-newspaper-office-n887526>; BBC, Annapolis journalists killed in 'targeted attack' on Capital Gazette, June 29, 2018

29 June 2018, <https://www.bbc.com/news/world-us-canada-44645986>

When Trump accepted a position of government authority, under our Constitution, his Constitutional rights became more limited in order to uphold the Constitutional laws that protect the freedoms of those he serves, the American people.

The Constitution laws limit the power of government agents in order to safeguard the freedoms of those who reside in America from persecution under the cloak of government authority.

Trump, as president, may not unconstitutionally chill the Press's speech and their freedom of the Press based on perceived, projected or manufactured political affiliation derived from the Press's exercise of their first amendment freedoms.

The freedom of the Press gives the Press the freedom to voice their disagreement with government actions and ideas, including the right to criticize the President.

The United States Supreme Court held, "Criticism of (a government official) conduct does not lose its constitutional protection merely because it is effective criticism and hence diminishes their official reputations." New York Times Co. v. Sullivan, 376 U.S. 254, 272-73, 84 S. Ct. 710, 722, 11 L. Ed. 2d 686 (1964).

Trump is the President of the United States.

Trump represents through his deeds and words, the government in the executive branch.

The Government through Trump's deeds and words unconstitutionally persecuted the Press for exercising their first amendment freedom.

Trump violated his oath to uphold the Constitution by actively disobeying the Constitution by persecuting the Press for exercising their Constitutional freedom of the Press.

Arguably, the President committed perjury under 18 U.S.C.A. § 1621, for lying under oath to uphold the Constitution and laws by actively knowingly violating the same, and/or refusing to read them in order that he may uphold the same.

Trump intended to cause the threat of economic harm and/or social harm and/or physical harm to the Press and against members of the Press who participated in the exercise of their freedom of the speech and the Press.

Trump has called for the boycott of the Press for exercising their

freedom.

On June 3, 2019, "President Donald Trump, in a tweet Monday morning, encouraged customers of AT&T to boycott the company to force it to make editorial changes at the CNN news network, which it owns."⁶

"The president wrote as he was preparing to meet Queen Elizabeth II at the start of a three-day state visit to the UK." Id.

"He said the only US news network he could find to watch after landing was CNN, which he found too negative in its coverage of the US." Id.

On June 3, 2019, the President tweeted, "'Just arrived in the United Kingdom, "'The only problem is that @CNN is the primary source of news available from the U.S. After watching it for a short while, I turned it off. All negative & so much Fake News, very bad for U.S. Big ratings drop. Why doesn't owner @ATT do something?" Id.

The President tweeted "I believe that if people sto(p)ed using or subscribing to @ATT, they would be forced to make big changes at @CNN, which is dying in the ratings anyway. It is so unfair with such bad, Fake News! Why wouldn't they act. When the World watches @CNN, it gets a false picture of USA. Sad!" Id.

On July 7, 2019 the President Tweeted, "Watching @FoxNews weekend anchors is worse than watching low ratings Fake News @CNN, or Lyin' Brian Williams (remember when he totally fabricated a War Story trying to make himself into a hero, & got fired. A very dishonest journalist!) and the crew of degenerate....."⁷

On July 7, 2019 Trump said Fox "network 'forgot the people who got them there.' He griped Fox News was 'loading up with Democrats' and complained it was citing The New York Times as 'a 'source' of information,' an apparent reference to the newspaper's Sunday article about disease, hunger and overcrowding at a Texas center holding migrant children." Id.

On July 11, 2019, in an article by the Fox news network, LLC, called Trump rails against 'Fake News' in bizarre tirade, warns industry will fold

⁶ Citing, Business Insider, Trump tells people to boycott CNN parent AT&T to force more positive coverage of his administration, By Tim Porter, June 3, 2019. https://www.businessinsider.com/trump-encourages-att-boycott-over-cnn-coverage-2019-6?fbclid=IwAR2aerXjC1P2P9UOXBBfJZx1y14-c7Vju2_A3OJB2XAYbxuRXscJIExyMPo

⁷ Newsweek, TRUMP DEFENDS SAUDI ARABIA'S MURDER OF JOURNALIST JAMAL KHASHOGGI BY SAYING IRAN KILLS PEOPLE TOO, By James Lemon, dated June 23, 2019, <https://www.newsweek.com/trump-defends-saudi-arabia-jamal-khashoggi-iran-kills-people-1445430>

when he leaves office, by Brooke Sigmund states: "President Trump teed off on the news media in a bizarre Twitter rant Thursday morning ahead of a big social media summit at the White House slated for later in the day."⁸

"The string of tweets attacked the news media and claimed the industry would go out of business when he leaves office, even suggesting outlets would be forced to endorse him this cycle for the sake of their own survival." Id.

"He went on to alternately praise himself, lob insults at familiar targets in the 2020 Democratic field and even joke about serving more than two terms." Id.

On January 11, 2017, in a news's conference, President persecuted the Press, diminishing the confidence in their news by stating "this political witch hunt by some in the media is based on some of the most flimsy reporting and is frankly shameful and disgraceful."⁹

On February 17, 2018, Trump tweeted "Funny how the Fake News Media doesn't want to say that the Russian group was formed in 2014, long before my run for President. Maybe they knew I was going to run even though I didn't know!"¹⁰

"Trump entered the election on June 16, 2015, after the Russian organization was formed — a fact that, contrary to Trump's Twitter musings, was reported by many news organizations." Id.

The President asserted facts that were not true. Id.

Yet, since he encourages Americans not to watch the news by calling it fake news, many believed Trump's false, misleading and deceiving allegations as truth. Id.

⁸ Citing, Fox news network, LLC, Trump rails against 'Fake News' in bizarre tirade, warns industry will fold when he leaves office, By Brooke Sigmund, July 11, 2019. August 10, 2018, <https://www.foxnews.com/politics/trump-rails-against-fake-news-in-bizarre-tirade-warns-industry-will-fold-when-he-leaves-office?fbclid=IwAR3um59LQ4S2GxajidPEPoSUdii099OYEhjGVsUu3T1jdb7lq4rtysQj7oY>

⁹ New York Times, Donald Trump's News Conference: Full Transcript and Video, January 11, 2017, <https://www.nytimes.com/2017/01/11/us/politics/trump-press-conference-transcript.html>

¹⁰ Citing, USA Today, Trump scolds 'Fake News Media' over reporting of Russian meddling in 2016 election, By Michael Collins, February 17, 2018.

<https://www.usatoday.com/story/news/politics/onpolitics/2018/02/17/trump-scolds-fake-news-media-over-reporting-russian-meddling-2016-election/348356002/>

On April 1, 2017, April Fool's Day "Mr. Trump fired off two tweets Saturday, first asking when Todd, (a specific newsman) and NBC will stop covering any Russian government ties to the White House, then vilifying NBC as the same network that perpetuated the theory he had "no path to victory" before the election. Mr. Trump dubbed NBC's coverage a 'total scam.' Todd discussed Russia Friday on NBC's 'Nightly News.'" ¹¹

The President tweeted, "It is the same Fake News Media that said there is "no path to victory for Trump" that is now pushing the phony Russia story. A total scam!" Id.

Trump compromised the Press's integrity by claiming the Press would reward the fruits of unlawful during a news conference in July 2016 when he stated. ¹²

"Russia, if you're listening, I hope you're able to find the 30,000 emails that are missing," with regards to Mrs. Clinton's deleted emails. "I think you will probably be rewarded mightily by our press." Id.

On-May 4, 2017, Trump tweeted "The Fake News media is officially out of control. They will do or say anything in order to get attention - never been a time like this!" ¹³

On January 11, 2017 Trump tweeted, "I win an election easily, a great "movement" is verified, and crooked opponents try to belittle our victory with FAKE NEWS. A sorry state!" Id.

¹¹ Citing, CBS News, Trump calls "Fake Trump/Russia story" a "total scam" as investigations ramp up, By Kathryn Watson, Dated April 1, 2017,

<https://www.cbsnews.com/news/trump-calls-fake-trump-russia-story-a-total-scam-as-investigations-ramp-up/>

¹² Citing, New York Times, Donald Trump Calls on Russia to Find Hillary Clinton's Missing Emails, July 27, 2016

<https://www.nytimes.com/2016/07/28/us/politics/donald-trump-russia-clinton-emails.html>

¹³ Citing, Axios, Everything Trump has called "FAKE NEWS", By Halsey Britzky, Jul 9, 2017, <https://www.axios.com/everything-trump-has-called-fake-news-1513303959-6603329e-46b5-44ea-b6be-70d0b3bdb0ca.html>, Citing, President Donald Trump's twitter account (This article contains direct links to President Trump's twitter account.)

"FAKE NEWS media, which makes up stories and "sources," is far more effective than the discredited Democrats - but they are fading fast!"

On Jan 11, 2017 Trump tweeted, "We had a great News Conference at Trump Tower today. A couple of FAKE NEWS organizations were there but the people truly get what's going on" Id.

On January 13, 2017, Trump tweeted, "Totally made up facts by sleazebag political operatives, both Democrats and Republicans - FAKE NEWS! Russia says nothing exists. Probably..." Id.

On February 16, 2017, Trump tweeted, " FAKE NEWS media, which makes up stories and "sources," is far more effective than the discredited Democrats - but they are fading fast!" Id.

On February 24, 2017 Trump tweeted, " FAKE NEWS media knowingly doesn't tell the truth. A great danger to our country. The failing @nytimes has become a joke. Likewise @CNN. Sad!" Id.

On June 6, 2017 Trump tweeted, "Sorry folks, but if I would have relied on the Fake News of CNN, NBC, ABC, CBS, washpost or nytimes, I would have had ZERO chance winning WH" Id.

January 12, 2017, Trump tweeted, ".@CNN is in a total meltdown with their FAKE NEWS because their ratings are tanking since election and their credibility will soon be gone!" Id.

On June 27, 2017, Trump tweeted, "Fake News CNN is looking at big management changes now that they got caught falsely pushing their phony Russian stories. Ratings way down!" Id.

On June 28, 2017, Trump tweeted, "The failing @nytimes writes false story after false story about me. They don't even call to verify the facts of a story. A Fake News Joke!" Id.

On June 28, 2017, Trump tweeted, "The #AmazonWashingtonPost, sometimes referred to as the guardian of Amazon not paying internet taxes (which they should) is FAKE NEWS!" Id.

On June 30, 2017, Trump tweeted, "Watched low rated @Morning_Joe for first time in long time. FAKE NEWS. He called me to stop a National Enquirer article. I said no! Bad show." Id.

In all of this the President undermined the integrity of the Press as an integral part of a free society.

The Freedom of the Press and the Freedom of speech makes America more free. The dissemination of information allows people to see different views, ideas and perspectives instead of the narrow view of the few with money, power and connections who, if allowed, would buy our eyes and ears to

profit off of our ignorance.

The freedom of the Press, and speech must be safeguarded from persecution at the behest of those with power.

The common man is made equal under the law by the laws safeguarding the freedom of the Press and speech. That is quite beautiful. The powerful must give up power. The lowly have laws that lift them higher by granting them more power than those in positions of authority. The common man is somehow more equal with the powerful by the Constitutional laws safeguarding the freedom of the Press and speech.

That humility and respect for the dignity of other people regardless of their station in life mandated by our Constitution is worth fighting against those few with evil, self serving, greedy, gluttonous interests. Those loveless creatures who seek to enslave and to be served as opposed to serve are rooted out by the Constitutional laws that make this country already great.

Trump made America less great by chilling the exercise of freedoms of those he serves Americans, including the members of the Press.

The President's words chilled the freedom of the Press and/or speech, and possibly other Americans' freedoms under the threat of economic persecution.

The lower Federal Courts recognize economic persecution as a form of government persecution.¹⁴

In all of this, Donald J. Trump has violated the First Amendment freedom of the Press against government persecution by willfully and knowingly persecuting those who exercised their freedom, Donald J. Trump.

In all of this, the President knowingly and willfully spoke and acted in a manner that violated the criminal law Title 18 of the United States Annotated Section 227.

In so doing he has undermined the integrity of his office, by violating federal criminal law and the freedoms under the Constitution, and brought disrepute on the Presidency, and betrayed his trust as President in a manner subversive of constitutional government, to the great prejudice of the cause of law and justice and to the manifest injury of the people of the United States.

¹⁴ The cases are limited to immigration cases, but the criminal statute Title 18 of the United States Code Annotated Section 227 extends government persecution by the President of the United States to economic persecution too. I applaud this branch of government for choosing to create a check on themselves and another branch of government.

Wherefore Donald J. Trump, by such conduct, warrants impeachment and trial, and removal from office.

**SAVE DUE
PROCESS
AND PREVENT
KIDNAPPING
BABIES AT THE
BORDER
ARTICLE OF
IMPEACHMENT**

116 TH CONGRESS
1ST SESSION

Impeaching Donald J. Trump, President of the United States, of high crimes and misdemeanors.

_____, 2019
submitted the following resolution; which was referred to the _____

Impeaching Donald J. Trump, President of the United States, of high crimes and misdemeanors.

RESOLUTION

Resolved, That Donald J. Trump,

President of the United States, is impeached for high crimes and misdemeanors, and that the following Articles of Impeachment to be exhibited to the Senate:

Articles of Impeachment to be exhibited by the House of Representatives of the United States of America in the name of itself and all of the people of the United States of America, against Donald J. Trump, President of the United States, in maintenance and support of its impeachment against him for high crimes and misdemeanors.

ARTICLE I

THE PRESIDENT'S VIOLATION OF OATH OF OFFICE, PERJURY BY FAILING TO UPHOLD THE CONSTITUTION, AND LAWS OF THE LAND, INCLUDING THE 5TH AMENDMENT DUE PROCESS CLAUSE

In his conduct while President of the United States, Donald J. Trump (herein also referred to as "President" or "Trump"), in violation of his constitutional oath to faithfully execute the office of President of the

Add the benefit charges for the prisoners please 250 2017

Use Gov. doc as Exhibit to Art. Impeachment exception BABY.

Keep

United States and, to the best of his ability, preserve, protect, defend and obey the Constitution of the United States, as well as his constitutional obligation to preserve, protect, defend and obey the laws of the land:

The President swore an oath to uphold the Constitutional laws.

The President has a duty to review, inform himself of such Constitutional laws, in order to uphold the Constitution,

The President's ignorance is not innocence.

Ignoring the Constitutional laws is not a defense in the President's violation of his oath of office to uphold the same.

No one is above the law. No one is below the law.

Remove

Not even the President of the United States is free to willfully violate the Constitution.

The President committed perjury by violating his oath to uphold the Constitution and Laws of the land by encouraging violation of the same under his policies at the border.

18 U.S.C.A. § 1621 provides:

"Whoever--

(1) having taken an oath before a competent tribunal, officer, or person, in any case in which a law of the United States authorizes an oath to be administered, that he will testify, declare, depose, or certify truly, or that any written testimony, declaration, deposition, or certificate by him subscribed, is true, willfully and contrary to such oath states or subscribes any material matter which he does not believe to be true; or

(2) in any declaration, certificate, verification, or statement under penalty of perjury as permitted under section 1746 of title 28, United States Code, willfully subscribes as true any material matter which he does not believe to be true; is guilty of perjury and shall, except as otherwise expressly provided by law, be fined under this title or imprisoned not more than five years, or both. This section is applicable whether the statement or subscription is made within or without the United States."

The President, through his policies at the Border, has encouraged the punishment of people in this country in violation of the 5th

boring evidence.

Amendment due process of law, in total disregard of his oath to uphold the Constitution, including the 5th Amendment.

The US Supreme Court held: "Fifth Amendment entitles aliens to due process of law in deportation proceedings, and detention during such proceedings is constitutionally valid aspect of deportation process." U.S.C.A. Const. Amend. 5th *Demore v. Kim*, 538 U.S. 510, 123 S. Ct. 1708, 155 L. Ed. 2d 724 (2003).¹

While detention is permitted at detention centers, the conditions at detention centers are so heinous must be considered punishment, not mere detention, without a hearing or trial, in deprivation of the detainees' substantive due process "right to bodily integrity," Citing *Albright v. Oliver*, 510 U.S. 266, 114 S. Ct. 807, 127 L. Ed.

"Since pretrial detainees ... are similarly restricted in their ability to fend for themselves, (the Government) owes a duty to both groups that effectively confers upon them a set of constitutional rights that fall under court's rubric of "basic human needs." *Hare v. City of Corinth, Miss.*, 74 F.3d 633 (5th Cir. 1996).

The absence of tooth paste, soap, beds, food, water and other basic needs for detainees at detention centers is unconscionable.

"Detainees described overcrowding so severe that 'it was difficult to move in any direction without jostling and being jostled.' The water provided them was foul, 'of a dark color, and an ordinary glass would collect a thick sediment.' The 'authorities never removed any filth.' A detainee wrote that the 'only shelter from the sun and rain and night dews, was what we could make by stretching over us our coats or scraps of blanket.' As for the food, 'Our ration was in quality a starving one, it being either too foul to be touched or too raw to be digested.'"²

"(C)hildren at a facility in Clint, Texas, were sleeping on concrete floors and being denied soap and toothpaste. (Observers) described children as young as 7 and 8, many of them wearing clothes caked with snot and tears ... 'caring for infants they've just met.' A visiting

¹ L. *Reno v. Flores*, 507 U.S. 292, 113 S. Ct. 1439, 123 L. Ed. 2d 1 (1993) ("Fifth Amendment entitles aliens to due process of law in deportation proceedings. U.S.C.A. Const. Amend. 5.")

² *A Crime by Any Name: The Trump administration's commitment to detarding immigration through cruelty has made horrifying conditions in detention facilities inevitable*, By Adam Sorwer, July 3, 2019, <https://www.theatlantic.com/ideas/archive/2019/07/border-facilities/392239/>

*Evidence Attach Exhibit
or Footnotes
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doctor called the detention centers 'torture facilities.' At least seven children have died in U.S. custody in the past year, compared with none in the 10 years prior. More than 11,000* children are now being held by the U.S. government on any given day. As if these conditions were insufficiently punitive, the administration has canceled recreational activities..." Id.

"At a processing center in El Paso, Texas, 900 migrants were 'being held at a facility designed for 125. In some cases, cells designed for 35 people were holding 155 people,' Id.

"The New York Times reported. One observer described the facility to Texas Monthly as a 'human dog pound.'" Id.

"The government's own investigators have found detainees in facilities run by Immigration and Customs Enforcement being fed expired food at detention facilities, 'nooses in detainee cells,'" "inadequate medical care,' and 'unsafe and unhealthy conditions.' Id.

"An early-July inspector-general report found "dangerous overcrowding" in some Border Patrol facilities and included pictures of people crowded together like human cargo." Id.

"Some of the people detained by the U.S. government have entered the United States illegally or overstayed their visas; some are simply seeking to exercise their legal right to asylum." Id.

"Chilling first-hand reports of migrant detention centers highlight smell of 'urine, feces,' overcrowded conditions." ³

"Children at three of the five Border Patrol facilities we visited had no access to showers ... [and] limited access to a change of clothes." Id.

In all of this, Donald J. Trump has undermined the integrity of his office, by violating federal criminal law and the freedoms under the Constitution, and brought disrepute on the Presidency, and betrayed his trust as President in a manner subversive of constitutional government, to the great prejudice of the cause of law and justice and

³ Government officials and pediatricians who have toured border facilities give first-hand accounts of conditions. USA TODAY compiled their words. By, James Sergeant, Elinor Aspegn, Elizabeth Lawrence and Olivia Sanchez, USA TODAY, Updated 10:32 a.m. EDT July 17, 2019
<https://www.usatoday.com/indepth/news/politics/elections/2019/07/16/migrant-detention-centers-described-2019-us-government-accounts/1694638001/>

to the manifest injury of the people of the United States.

ARTICLE II CRIME OF KIDNAPPING

The allegations contained in paragraphs above and are repeated and realleged as though fully set forth herein.

The President encouraged, aided and abetted and, or conspired with the kidnapping of individuals under implementation of his border policies.

18 U.S.C.A. § 1201, the federal kidnapping statute provides:

" (a) Whoever unlawfully seizes, confines, inveigles, decoys, kidnaps, abducts, or carries away and holds for ransom or reward or otherwise any person, except in the case of a minor by the parent thereof, when--

(1) the person is willfully transported in interstate or foreign commerce, regardless of whether the person was alive when transported across a State boundary, or the offender travels in interstate or foreign commerce or uses the mail or any means, facility, or instrumentality of interstate or foreign commerce in committing or in furtherance of the commission of the offense;

(2) any such act against the person is done within the special maritime and territorial jurisdiction of the United States;

(3) any such act against the person is done within the special aircraft jurisdiction of the United States as defined in section 46501 of title 49;

(4) the person is a foreign official, an internationally protected person, or an official guest as those terms are defined in section 1116(b) of this title; or

(5) the person is among those officers and employees described in section 1114 of this title and any such act against the person is done while the person is engaged in, or on account of, the performance of official duties,

shall be punished by imprisonment for any term of years or for life and, if the death of any person results, shall be punished by death or life imprisonment.

(b) With respect to subsection (a)(1), above, the failure to release the victim within twenty-four hours after he shall have been unlawfully seized, confined, inveigled, decoyed, kidnapped, abducted, or carried away shall create a rebuttable presumption that such person has been transported in interstate or foreign commerce. Notwithstanding the

bring Law

LONG LAW

preceding sentence, the fact that the presumption under this section has not yet taken effect does not preclude a Federal investigation of a possible violation of this section before the 24-hour period has ended.

(c) If two or more persons conspire to violate this section and one or more of such persons do any overt act to effect the object of the conspiracy, each shall be punished by imprisonment for any term of years or for life.

(d) Whoever attempts to violate subsection (a) shall be punished by imprisonment for not more than twenty years.

(e) If the victim of an offense under subsection (a) is an internationally protected person outside the United States, the United States may exercise jurisdiction over the offense if (1) the victim is a representative, officer, employee, or agent of the United States, (2) an offender is a national of the United States, or (3) an offender is afterwards found in the United States. As used in this subsection, the United States includes all areas under the jurisdiction of the United States including any of the places within the provisions of sections 5 and 7 of this title and section 46501(2) of title 49. For purposes of this subsection, the term "national of the United States" has the meaning prescribed in section 101(a)(22) of the Immigration and Nationality Act (8 U.S.C. 1101(a)(22)).

(f) In the course of enforcement of subsection (a)(4) and any other sections prohibiting a conspiracy or attempt to violate subsection (a)(4), the Attorney General may request assistance from any Federal, State, or local agency, including the Army, Navy, and Air Force, any statute, rule, or regulation to the contrary notwithstanding.

(g) Special Rule for Certain Offenses Involving Children.--

(1) To whom applicable.--If--

(A) the victim of an offense under this section has not attained the age of eighteen years; and

(B) the offender--

(i) has attained such age; and

(ii) is not--

(I) a parent;

(II) a grandparent;

- (III) a brother;
- (IV) a sister;
- (V) an aunt;
- (VI) an uncle; or
- (VII) an individual having legal custody of the victim;

the sentence under this section for such offense shall include imprisonment for not less than 20 years.

(h) As used in this section, the term "parent" does not include a person whose parental rights with respect to the victim of an offense under this section have been terminated by a final court order."

The President encouraged Americans and aliens to be recklessly placed in detention centers without probable cause or legal justification, in utter disregard to the rule of law.

Sorting them out later is unlawful imprisonment in violation of 18 U.S.C.A. § 1201. Due Process requires legal justification, probable cause, before detention.

In all of this, Donald J. Trump has undermined the integrity of his office, by violating federal criminal law and the freedoms under the Constitution, and brought disrepute on the Presidency, and betrayed his trust as President in a manner subversive of constitutional government, to the great prejudice of the cause of law and justice and to the manifest injury of the people of the United States.

Wherefore Donald J. Trump, by such conduct, warrants impeachment and trial, and removal from office.

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**STORMY DANIELS
AND THE MISPAID
DOLLARS
ARTICLE OF
IMPEACHMENT**

116 TH CONGRESS

1ST SESSION

Impeaching Donald J. Trump, President of the United States, of high crimes and misdemeanors.

_____, 2019
_____ submitted the following resolution; which was referred to the _____

Impeaching Donald J. Trump, President of the United States, of high crimes and misdemeanors.

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Articles of Impeachment to be exhibited by the House of Representatives of the United States of America in the name of itself and all of the people of the United States of America, against Donald J. Trump, President of the United States, in maintenance and support of its impeachment against him for high crimes and misdemeanors.

ARTICLE I

THE PRESIDENT'S VIOLATION OF CAMPAIGN FINANCE LAW

In his conduct while President of the United States, Donald J. Trump (herein also referred to as "President" or "Trump"), in violation of his constitutional oath to faithfully execute the office of President of the United States and, to the best of his ability, preserve, protect, defend and obey the Constitution of the United States, as well as his constitutional obligation to preserve, protect, defend and obey the laws of the land,

including the Criminal Statutes under the Internal Revenue Code.

Back Ground

A Campaign Finance Violations

The Federal Election Campaign Act of 1971, as amended, Title 52, United States Code, Section 30101, et seq., (the "Election Act"), regulates the influence of money on politics. At all times relevant to the Information, the Election Act set forth the following limitations, prohibitions, and reporting requirements, which were applicable to President Donald J. Trump, and his campaign:

(a) Individual contributions to any presidential candidate, including expenditures coordinated with a candidate or his political committee, were limited to \$2,700 per election, and presidential candidates and their committees were prohibited from accepting contributions from individuals in excess of this limit.

(b) Corporations were prohibited from making contributions directly to presidential candidates, including expenditures coordinated with candidates or their committees; and candidates were prohibited from accepting corporate contributions.

On or about June 16, 2015, President Donald J. Trump (hereinafter also "Trump") began his presidential campaign.

While MICHAEL COHEN, continued to work at the Company and did not have a formal title with the campaign, he had a campaign email address and, at various times, advised the campaign, including on matters of interest to the press, and made televised and media appearances on behalf of the campaign.

At all times relevant to this Information, Corporation-1 was a media company that owns, among other things, a popular tabloid magazine ("Magazine-1").

In or about August 2015, the Chairman and Chief Executive of Corporation-1 ("Chairman-1"), in coordination with Michael Cohen ("Cohen"), and one or more members of the campaign, offered to help deal with negative stories about Donald J. Trump's relationships with women by, among other things, assisting the campaign in identifying such stories so they could be purchased and their publication avoided. Chairman-1 agreed to keep Cohen apprised of any such negative stories.

Consistent with the agreement described above, Corporation-1 advised MICHAEL COHEN, the defendant, of negative stories during the course of

the campaign, and COHEN, with the assistance of Corporation-1, was able to arrange for the purchase of two stories so as to suppress them and prevent them from influencing the election.

First, in or about June 2016, a model actress and Playboy Playmate Karen McDougal (McDougal) began attempting to sell her story of her alleged extramarital affair with Donald J. Trump that had taken place in 2006 and 2007, knowing the story would be of considerable value because of the election. Woman-1 retained an attorney ("Attorney-1"), who in turn contacted the editor-in-chief of Magazine-1 ("Editor-1"), and offered to sell McDougal's story to Magazine-1. Chairman-1 and Editor-1 informed Cohen, the defendant, of the story. At COHEN's urging and subject to Cohen's promise that Corporation-1 would be reimbursed, Editor-1 ultimately began negotiating for the purchase of the story.

On or about August 5, 2016, Corporation-1 entered into an agreement with McDougal) to acquire her "limited life rights" to the story of her relationship with "any then-married man," in exchange for \$150,000 and a commitment to feature her on two magazine covers and publish over one hundred magazine articles authored by her. Despite the cover and article features to the agreement, its principal purpose, as understood by those involved, including Cohen, and Trump, was to suppress McDougal's story so as to prevent it from influencing the election.

Between in or about late August 2016 and September 2016, MICHAEL COHEN, the defendant, agreed with Chairman-1 to assign the rights to the non-disclosure portion of Corporation-1's agreement with McDougal to COHEN for \$125,000. COHEN incorporated a shell entity called "Resolution Consultants LLC" for use in the transaction. Both Chairman-1 and COHEN ultimately signed the agreement, and a consultant for Corporation-1, using his own shell entity, provided COHEN with an invoice for the payment of \$125,000. However, in or about early October 2016, after the assignment agreement was signed but before COHEN had paid the \$125,000, Chairman-1 contacted COHEN and told him, in substance, that the deal was off and that COHEN should tear up the assignment agreement. COHEN did not tear up the agreement, which was later found during a judicially authorized search of his office.

Second, on or about October 8, 2016, an agent for an adult film actress Stephanie Clifford, also known as Stormy Daniels ("Clifford") informed Editor-1 that Clifford was willing to make public statements and confirm on the record her alleged past affair with Trump. Chairman-1 and Editor-1 then contacted Cohen, the defendant, and put him in touch with Attorney-1, who was also representing Clifford. Over the course of the next few days, Cohen negotiated a \$130,000 agreement with Attorney-1 to himself purchase Cohen's silence, and received a signed confidential settlement agreement and a separate side letter agreement from Attorney-1.

MICHAEL COHEN, the defendant, did not immediately execute the agreement, nor did he pay Clifford. On the evening of October 25, 2016, with no deal with Clifford finalized, Attorney-1 told Editor-1 that Clifford was close to completing a deal with another outlet to make her story public. Editor-1, in turn, texted

COHEN, the defendant, that "[w]e have to coordinate something on the matter [Attorney-1 is] calling you about or it could look awfully bad for everyone." Chairman-1 and Editor-1 then called COHEN through an encrypted telephone application. COHEN agreed to make the payment, and then called Attorney-1 to finalize the deal.

The next day, on October 26, 2016, MICHAEL COHEN emailed an incorporating service to obtain the corporate formation documents for another shell corporation, Essential Consultants LLC, which COHEN had incorporated a few days prior. Later that afternoon, COHEN drew down \$131,000 from a fraudulently obtained HELOC, and requested that it be deposited into a bank account COHEN had just opened in the name of Essential Consultants. The next morning, on October 27, 2016, COHEN went to Bank-3 and wired approximately \$130,000 from Essential Consultants to Attorney-1. On the bank form to complete the wire, COHEN falsely indicated that the "purpose of wire being sent" was "retainer." On or about November 1, 2016, COHEN received from Attorney-1 copies of the final, signed confidential settlement agreement and side letter agreement.

Trump through his agent Cohen, caused and made the payments described herein in order to influence the 2016 presidential election. In so doing, he coordinated with one or more members of the campaign, including through meetings and phone calls, about the fact, nature, and timing of the payments.

As a result of the payments solicited and made by Cohen, the defendant, neither McDougal nor Clifford spoke to the press prior to the election.

In or about January 2017, Cohen, the defendant, in seeking reimbursement for election-related expenses, presented executives of the Company with a copy of a bank statement from the Essential Consultants bank account, which reflected the \$130,000 payment Cohen had made to the bank account of Attorney-1 in order to keep Woman-2 silent in advance of the election, plus a \$35 wire fee, adding, in handwriting, an additional "\$50,000." The \$50,000 represented a claimed payment for "tech services," which in fact related to work Cohen had solicited from a technology company during and in connection with the campaign. Cohen added these amounts to a sum of \$180,035. After receiving this document, executives of the Company "grossed up" for tax purposes Cohen's requested reimbursement of \$180,000 to \$360,000, and then added a bonus of \$60,000 so that Cohen would be paid \$420,000 in total. Executives of the Company also

at the request of Trump

determined that the \$420,000 would be paid to Cohen in monthly amounts of \$35,000 over the course of twelve months, and that Cohen should send invoices for these payments.

On or about February 14, 2017, Cohen, the defendant, sent an executive of the Company ("Executive-1") the first of his monthly invoices, requesting "[p]ursuant to [a]retainer agreement, payment for services rendered for the months of January and February, 2017." The invoice listed \$35,000 for each of those two months. Executive-1 forwarded the invoice to another executive of the Company ("Executive-2") the same day by email, and it was approved. Executive-1 forwarded that email to another employee at the Company, stating: "Please pay from the Trust. Post to legal expenses. Put 'retainer for the months of January and February 2017' in the description."

Throughout 2017, Cohen, sent to one or more representatives of the Company monthly invoices, which stated, "Pursuant to the retainer agreement, kindly remit payment for services rendered for" the relevant month in 2017, and sought \$35,000 per month.

The Company accounted for these payments as legal expenses. In truth and in fact, there was no such retainer agreement, and the monthly invoices COHEN submitted were not in connection with any legal services he had provided in 2017. During 2017, pursuant to the invoices described above, Cohen, the defendant, received monthly \$35,000 reimbursement checks, totaling \$420,000.

At all times Cohen acted on behalf of, at the request of or under the instruction of President Trump.
In so doing Trump violated campaign finance law.

B (Causing an Unlawful Corporate Contribution)

The allegations contained in paragraphs above and below are repeated and realleged as though fully set forth herein.

From in or about June 2016, up to and including in or about October 2016, in the Southern District of New York and elsewhere, Trump through his agent, Cohen, the defendant, knowingly and willfully caused a corporation to make a contribution and expenditure, aggregating \$25,000 and more during the 2016 calendar year, to the campaign of a candidate for President of the United States, to wit, Cohen caused Corporation-1 to make and advance a \$150,000 payment to Playboy Playmate Karen McDougal, including through the promise of reimbursement, so as to ensure that Playboy Playmate Karen McDougal did not publicize damaging allegations before the 2016 presidential election and thereby influence that election.

(Excessive Campaign Contribution)

The allegations contained in paragraphs above and are repeated and realleged as though fully set forth herein.

On or about October 27, 2016, in the Southern District of New York and elsewhere, Cohen, knowingly and willfully made and caused to be made a contribution to Trump, a candidate for Federal office, and his authorized political committee in excess of the limits of the Election Act, which aggregated \$25,000 and more in calendar year 2016, and did so by making and causing to be made an expenditure, in cooperation, consultation, and concert with, and at the request and suggestion of one or more members of the campaign, to wit, Cohen made a \$130,000 payment to porn star Stormy Daniels, whose real name is Stephanie Clifford to ensure that she did not publicize damaging allegations before the 2016 presidential election and thereby influence that election.

Upon information and belief Pres. Trump directed Cohen to commit a crime by paying two women for the principal purpose of influencing an election.

Cohen's lawyer Lanny Davis told the press, Donald Trump directed Cohen to commit a crime by paying payments to two women for the principal purpose of influencing an election.

Cohen also testified under oath at Capital Hill that Donald Trump directed Cohen to commiy a crime by paying payments to two women for the purpose of influencing an election.

During his testimony on Capital hill in February 2019, President Trump's attorney Michael Cohen submitted copies of checks that Trump, his son Donald Trump Jr. and the COO of the Trump Organization made to him — evidence intended to support Cohen's claim that the president engaged in possible criminal conduct while in office

Cohen provided a copy of a check that he says was personally signed by Trump in 2017 to reimburse him for paying off Stormy Daniels, an adult-film actress who had alleged having an affair with Trump.

Cohen testified, "I am providing a copy of a \$35,000 check that President Trump personally signed from his personal bank account on Aug. 1 of 2017 — when he was President of the United States — pursuant to the cover-up, which was the basis of my guilty plea, to reimburse me — the word used by Mr. Trump's TV lawyer — for the illegal hush money I paid on his behalf. This \$35,000 check was one of 11 check installments that was paid throughout the year, while he was President," according to Cohen at a House Committee on Oversight and Reform hearing.

Cohen advised, "The President of the United States thus wrote a personal check for the payment of hush money as part of a criminal scheme to violate campaign finance laws. You can find the details of that scheme,

directed by Mr. Trump, in the pleadings in the U.S. District Court for the Southern District of New York.”

Cohen also provided a second check (“Trust check”) to Congress on Capitol Hill, from the Donald J. Trump- Revocable Trust Account to Cohen in the amount of \$35,000 check, dated March 17, 2017.

The Trust Check was signed by Donald Trump Jr. and Trump organization chief operating officer Allen Weisselberg — “to reimburse me for the hush money payments,” Cohen told the committee.

In all of this, Donald J. Trump has violated campaign finance law.

Criminal Violations under the Internal Revenue Code

The allegations contained in paragraphs above and are repeated and realleged as though fully set forth herein.

In his conduct while President of the United States, Donald J. Trump (herein also referred to as “President” or “Trump”), in violation of his constitutional oath to faithfully execute the office of President of the United States and, to the best of his ability, preserve, protect, defend and obey the Constitution of the United States, as well as his constitutional obligation to preserve, protect, defend and obey the laws of the land, including the Criminal Laws under the Internal Revenue Code.

Upon information and belief, Trump failed to report the payments made to Cohen, referred to above, to the Federal Election Commission.

Upon information and belief Trump directed payment to Cohen from an improper account in an attempt to influence an election.

It is not a lawful permitted purpose of any trust to make an unlawful payment out of a trust account, including the Donald J. Trump - Revocable Account.

Cohen accepted a payment in the amount of \$35,000.00 from the Donald J. Trump - Revocable Account.

It is not a lawful, permitted, purpose to make an unlawful payment out of Trump's personal account.

Cohen accepted an unlawful payment from Trump's personal account in the amount of \$35,000.00.

Upon information and belief Trump directed his agents to make unlawful payments to McDougal and Clifford in an attempt to influence an election.

Upon information and belief the payments to McDougal, Clifford and Cohen were not paid out of the campaign account required by the Federal Election Commission.

As aforementioned the payments to McDougal and Clifford exceeded lawful campaign limits.

The payments were not accurately reported with the Federal Elections Commission.

Since improper payments were made out of improper accounts, in unlawful amounts, Trump misstated information on tax forms relating to his campaign and possibly other entities.

The tax forms are signed under oath.

In doing so, upon information and belief, Trump violated the following criminal provisions of the internal revenue code.

A.

Pursuant to 26 U.S.C.A. § 7206. relating to fraud and false statements, "Any person who--

- (1) Declaration under penalties of perjury.--Willfully makes and subscribes any return, statement, or other document, which contains or is verified by a written declaration that it is made under the penalties of perjury, and which he does not believe to be true and correct as to every material matter; or
- (2) Aid or assistance.--Willfully aids or assists in, or procures, counsels, or advises the preparation or presentation under, or in connection with any matter arising under, the internal revenue laws, of a return, affidavit, claim, or other document, which is fraudulent or is false as to any material matter, whether or not such falsity or fraud is with the knowledge or consent of the person authorized or required to present such return, affidavit, claim, or document; or
- 3) Fraudulent bonds, permits, and entries.--Simulates or falsely or fraudulently executes or signs any bond, permit, entry, or other document required by the provisions of the internal revenue laws, or by any regulation made in pursuance thereof, or procures the same to be falsely or fraudulently executed, or advises, aids in, or connives at such execution thereof; or

(4) Removal or concealment with intent to defraud.--Removes, deposits, or conceals, or is concerned in removing, depositing, or concealing, any goods or commodities for or in respect whereof any tax is or shall be imposed, or any property upon which levy is authorized by section 6331, with intent to evade or defeat the assessment or collection of any tax imposed by this title; or

(5) Compromises and closing agreements.--In connection with any compromise under section 7122, or offer of such compromise, or in connection with any closing agreement under section 7121, or offer to enter into any such agreement, willfully--

(A) Concealment of property.--Conceals from any officer or employee of the United States any property belonging to the estate of a taxpayer or other person liable in respect of the tax, or

(B) Withholding, falsifying, and destroying records.--Receives, withholds, destroys, mutilates, or falsifies any book, document, or record, or makes any false statement, relating to the estate or financial condition of the taxpayer or other person liable in respect of the tax; shall be guilty of a felony and, upon conviction thereof, shall be fined not more than \$100,000 (\$500,000 in the case of a corporation), or imprisoned not more than 3 years, or both, together with the costs of prosecution."

B

Pursuant to 26 U.S.C.A. § 7202. § 7202. Willful failure to collect or pay over tax

"Any person required under this title to collect, account for, and pay over any tax imposed by this title who willfully fails to collect or truthfully account for and pay over such tax shall, in addition to other penalties provided by law, be guilty of a felony and, upon conviction thereof, shall be fined not more than \$10,000, or imprisoned not more than 5 years, or both, together with the costs of prosecution." (emphasis intended).

Trump did not account for payments out of the campaign account for payments made to influence the election because he allowed, permitted or directed payments to be made out of different accounts.

The intent was in part to conceal the fact the payments exceeded campaign limits permitted since Trump did not want to get into trouble.

Upon information and belief, Trump has access to a former Circuit Court Judge, his sister and other attorneys.

Upon information and belief, Trump knew, or should have known, his conduct was improper, unlawful and or wrong.

C.

Pursuant to 26 U.S.C.A § 7201. Attempt to evade or defeat tax

Any person who willfully attempts in any manner to evade or defeat any tax imposed by this title or the payment thereof shall, in addition to other penalties provided by law, be guilty of a felony and, upon conviction thereof, shall be fined not more than \$100,000 (\$500,000 in the case of a corporation), or imprisoned not more than 5 years, or both, together with the costs of prosecution. (emphasis intended).

Trump willfully sought to evade reporting improper payments with the Federal Election Commission.

Trump willfully permitted payments out of an improper account with the intent, in part, to influence an election.

D.

Pursuant to 26 U.S.C.A § 7207. Fraudulent returns, statements, or other documents

"Any person who willfully delivers or discloses to the Secretary any list, return, account, statement, or other document, known by him to be fraudulent or to be false as to any material matter, shall be fined not more than \$10,000 (\$50,000 in the case of a corporation), or imprisoned not more than 1 year, or both. Any person required pursuant to section 6047(b), section 6104(d), or subsection (i) or (j) of section 527 to furnish any information to the Secretary or any other person who willfully furnishes to the Secretary or such other person any information known by him to be fraudulent or to be false as to any material matter shall be fined not more than \$10,000 (\$50,000 in the case of a corporation), or imprisoned not more than 1 year, or both." (emphasis intended).

Upon information and belief, Trump failed to report all payments made and or accepted with an intent to influence an election on his tax forms.

The fact payments were made from improper accounts is circumstantial evidence that Trump failed to report the money in proper accounts as required by the Federal Elections Commission.

In all of this, the President knowingly and willfully spoke and acted in a manner that violated the criminal laws under the Internal Revenue Code.

In so doing he has undermined the integrity of his office, by violating federal criminal law and the Constitution, and brought disrepute on the Presidency, and betrayed his trust as President in a manner subversive of constitutional government, to the great prejudice of the cause of law and

justice and to the manifest injury of the people of the United States.

Wherefore Donald J. Trump, by such conduct, warrants impeachment and trial, and removal from office ~~wherefore Donald J. Trump, by such conduct, warrants impeachment and trial, and removal from office~~

DONALD J. TRUMP
725 5TH AVENUE
NEW YORK, NY 10022

FARMAL ONE N.A.
37 WEST 87TH STREET
NEW YORK, NY 10019

60-7911214

NO.
002821

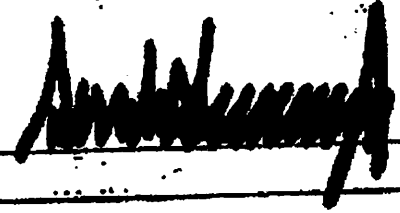
CHECK DATE
08/01/17

CHECK AMOUNT
*****\$35,000.00**

PAY **THIRTY FIVE THOUSAND DOLLARS AND NO CENTS**

TO THE
ORDER OF

MICHAEL D. COHEN ESQ
10A
NEW YORK, NY 10022



DONALD J. TRUMP - REVOCABLE TRUST ACCOUNT
725 5TH AVENUE
NEW YORK, NY 10022

CAPITAL ONE N.A.
37 WEST 37th STREET
NEW YORK, NY 10018

60-791214

NO
000147

CHECK DATE
03/17/17

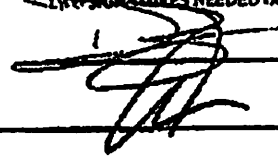
CHECK AMOUNT
*****\$35,000.00**

PAY **THIRTY FIVE THOUSAND DOLLARS AND NO CENTS*****

TO THE
ORDER OF

MICHAEL D COHEN ESQ
10A
NEW YORK, NY 10022

***SIGNATURES NEEDED ON AMTS OVER \$10,000.



[Redacted area]

State of Delaware
Secretary of State
Division of Corporations
Delivered 01:14 PM 09/30/2016
FILED 01:14 PM 09/30/2016
SR 2016016733 - File Number 6160356

**STATE of DELAWARE
LIMITED LIABILITY COMPANY
CERTIFICATE of FORMATION**

RESOLUTION CONSULTANTS LLC

First: The name of the limited liability company is Resolution Consultants LLC.

Second: The address of its registered office in the State of Delaware is 160 Greentree Drive, Suite # 101 in the City of Dover, County of Kent, Zip code 19904. The name of its registered agent at such address is National Registered Agents, Inc.

In Witness Whereof, the undersigned has executed this Certificate of Formation this 30th day of September, 2016.

By: /s/ Michael Cohen
Authorized Person

Name: Michael Cohen

State of Delaware
Secretary of State
Division of Corporations
Delivered 10:21 AM 10/17/2016
FILED 10:21 AM 10/17/2016
SR 20166222994 - File Number 6185135

**STATE of DELAWARE
LIMITED LIABILITY COMPANY
CERTIFICATE of FORMATION**

ESSENTIAL CONSULTANTS LLC

First: The name of the limited liability company is Essential Consultants LLC.

Second: The address of its registered office in the State of Delaware is 160 Greentree Drive, Suite # 101 in the City of Dover, County of Kent, Zip code 19904. The name of its registered agent at such address is National Registered Agents, Inc.

In Witness Whereof, the undersigned has executed this Certificate of Formation this 17th day of October, 2016.

**By: /s/ Michael Cohen
Authorized Person**

Name: Michael Cohen

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ORIGINAL

Judge Pauley

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
UNITED STATES OF AMERICA :
- v. - :
MICHAEL COHEN, :
Defendant. :
----- x

INFORMATION

18 Cr. (WHP)

18 CRIM 602

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC.#:
DATE FILED: **AUG 21 2018**

The United States Attorney charges:

Background

The Defendant

1. From in or about 2007 through in or about January 2017, MICHAEL COHEN, the defendant, was an attorney and employee of a Manhattan-based real estate company (the "Company"). COHEN held the title of "Executive Vice President" and "Special Counsel" to the owner of the Company ("Individual-1").

2. In or about January 2017, COHEN left the Company and began holding himself out as the "personal attorney" to Individual-1, who at that point had become the President of the United States.

in addition to working for and earning income from 11 times relevant to this Information, MICHAEL COHEN owned taxi medallions in New York City and millions of dollars. COHEN owned these taxi

I copied and pasted the text below part from this AG's court order.

18-cv-00602-WHP

Judge

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Campaign Finance Violations

The United States Attorney further charges:

24. The Federal Election Campaign Act of 1971, as amended, Title 52, United States Code, Section 30101, et seq., (the "Election Act"), regulates the influence of money on politics. At all times relevant to the Information, the Election Act set forth the following limitations, prohibitions, and reporting requirements, which were applicable to MICHAEL COHEN, the defendant, Individual-1, and his campaign:

a. Individual contributions to any presidential candidate, including expenditures coordinated with a candidate or his political committee, were limited to \$2,700 per election, and presidential candidates and their committees were prohibited from accepting contributions from individuals in excess of this limit.

b. Corporations were prohibited from making contributions directly to presidential candidates, including expenditures coordinated with candidates or their committees, and candidates were prohibited from accepting corporate contributions.

25. On or about June 16, 2015, Individual-1 began his presidential campaign. While MICHAEL COHEN, the defendant, continued to work at the Company and did not have a formal title with the campaign, he had a campaign email address and, at various times, advised the campaign, including on matters of interest to

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the press, and made televised and media appearances on behalf of the campaign.

26. At all times relevant to this information, Corporation-1 was a media company that owns, among other things, a popular tabloid magazine ("Magazine-1").

27. In or about August 2015, the Chairman and Chief Executive of Corporation-1 ("Chairman-1"), in coordination with MICHAEL COHEN, the defendant, and one or more members of the campaign, offered to help deal with negative stories about Individual-1's relationships with women by, among other things, assisting the campaign in identifying such stories so they could be purchased and their publication avoided. Chairman-1 agreed to keep COHEN apprised of any such negative stories.

28. Consistent with the agreement described above, Corporation-1 advised MICHAEL COHEN, the defendant, of negative stories during the course of the campaign, and COHEN, with the assistance of Corporation-1, was able to arrange for the purchase of two stories so as to suppress them and prevent them from influencing the election.

29. First, in or about June 2016, a model and actress ("Woman-1") began attempting to sell her story of her alleged extramarital affair with Individual-1 that had taken place in 2006 and 2007, knowing the story would be of considerable value because

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of the election. Woman-1 retained an attorney ("Attorney-1"), who in turn contacted the editor-in-chief of Magazine-1 ("Editor-1"), and offered to sell Woman-1's story to Magazine-1. Chairman-1 and Editor-1 informed MICHAEL COHEN, the defendant, of the story. At COHEN's urging and subject to COHEN's promise that Corporation-1 would be reimbursed, Editor-1 ultimately began negotiating for the purchase of the story.

30. On or about August 5, 2016, Corporation-1 entered into an agreement with Woman-1 to acquire her "limited life rights" to the story of her relationship with "any then-married man," in exchange for \$150,000 and a commitment to feature her on two magazine covers and publish over one hundred magazine articles authored by her. Despite the cover and article features to the agreement, its principal purpose, as understood by those involved, including MICHAEL COHEN, the defendant, was to suppress Woman-1's story so as to prevent it from influencing the election.

31. Between in or about late August 2016 and September 2016, MICHAEL COHEN, the defendant, agreed with Chairman-1 to assign the rights to the non-disclosure portion of Corporation-1's agreement with Woman-1 to COHEN for \$125,000. COHEN incorporated a shell entity called "Resolution Consultants LLC" for use in the transaction. Both Chairman-1 and COHEN ultimately signed the agreement, and a consultant for Corporation-1, using

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his own shell entity, provided COHEN with an invoice for the payment of \$125,000. However, in or about early October 2016, after the assignment agreement was signed but before COHEN had paid the \$125,000, Chairman-1 contacted COHEN and told him, in substance, that the deal was off and that COHEN should tear up the assignment agreement. COHEN did not tear up the agreement, which was later found during a judicially authorized search of his office.

32. Second, on or about October 8, 2016, an agent for an adult film actress ("Woman-2") informed Editor-1 that Woman-2 was willing to make public statements and confirm on the record her alleged past affair with Individual-1. Chairman-1 and Editor-1 then contacted MICHAEL COHEN, the defendant, and put him in touch with Attorney-1, who was also representing Woman-2. Over the course of the next few days, COHEN negotiated a \$130,000 agreement with Attorney-1 to himself purchase Woman-2's silence, and received a signed confidential settlement agreement and a separate side letter agreement from Attorney-1.

33. MICHAEL COHEN, the defendant, did not immediately execute the agreement, nor did he pay Woman-2. On the evening of October 25, 2016, with no deal with Woman-2 finalized, Attorney-1 told Editor-1 that Woman-2 was close to completing a deal with another outlet to make her story public. Editor-1, in turn, texted

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MICHAEL COHEN, the defendant, that "[w]e have to coordinate something on the matter [Attorney-1 is] calling you about or it could look awfully bad for everyone." Chairman-1 and Editor-1 then called COHEN through an encrypted telephone application. COHEN agreed to make the payment, and then called Attorney-1 to finalize the deal.

34. The next day, on October 26, 2016, MICHAEL COHEN, the defendant, emailed an incorporating service to obtain the corporate formation documents for another shell corporation, Essential Consultants LLC, which COHEN had incorporated a few days prior. Later that afternoon, COHEN drew down \$131,000 from the fraudulently obtained HELOC, discussed above in paragraphs 19 through 21, and requested that it be deposited into a bank account COHEN had just opened in the name of Essential Consultants. The next morning, on October 27, 2016, COHEN went to Bank-3 and wired approximately \$130,000 from Essential Consultants to Attorney-1. On the bank form to complete the wire, COHEN falsely indicated that the "purpose of wire being sent" was "retainer." On or about November 1, 2016, COHEN received from Attorney-1 copies of the final, signed confidential settlement agreement and side letter agreement.

35. MICHAEL COHEN, the defendant, caused and made the payments described herein in order to influence the 2016

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presidential election. In so doing, he coordinated with one or more members of the campaign, including through meetings and phone calls, about the fact, nature, and timing of the payments.

36. As a result of the payments solicited and made by MICHAEL COHEN, the defendant, neither Woman-1 nor Woman-2 spoke to the press prior to the election.

37. In or about January 2017, MICHAEL COHEN, the defendant, in seeking reimbursement for election-related expenses, presented executives of the Company with a copy of a bank statement from the Essential Consultants bank account, which reflected the \$130,000 payment COHEN had made to the bank account of Attorney-1 in order to keep Woman-2 silent in advance of the election, plus a \$35 wire fee, adding, in handwriting, an additional "\$50,000." The \$50,000 represented a claimed payment for "tech services," which in fact related to work COHEN had solicited from a technology company during and in connection with the campaign. COHEN added these amounts to a sum of \$180,035. After receiving this document, executives of the Company "grossed up" for tax purposes COHEN's requested reimbursement of \$180,000 to \$360,000, and then added a bonus of \$60,000 so that COHEN would be paid \$420,000 in total. Executives of the Company also determined that the \$420,000 would be paid to COHEN in monthly amounts of \$35,000 over the course of

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twelve months, and that COHEN should send invoices for these payments.

38. On or about February 14, 2017, MICHAEL COHEN, the defendant, sent an executive of the Company ("Executive-1") the first of his monthly invoices, requesting "[p]ursuant to [a] retainer agreement, . . . payment for services rendered for the months of January and February, 2017." The invoice listed \$35,000 for each of those two months. Executive-1 forwarded the invoice to another executive of the Company ("Executive-2") the same day by email, and it was approved. Executive-1 forwarded that email to another employee at the Company, stating: "Please pay from the Trust. Post to legal expenses. Put 'retainer for the months of January and February 2017' in the description."

39. Throughout 2017, MICHAEL COHEN, the defendant, sent to one or more representatives of the Company monthly invoices, which stated, "Pursuant to the retainer agreement, kindly remit payment for services rendered for" the relevant month in 2017, and sought \$35,000 per month. The Company accounted for these payments as legal expenses. In truth and in fact, there was no such retainer agreement, and the monthly invoices COHEN submitted were not in connection with any legal services he had provided in 2017.

40. During 2017, pursuant to the invoices described above, MICHAEL COHEN, the defendant, received monthly \$35,000 reimbursement checks, totaling \$420,000.

COUNT 7
(Causing an Unlawful Corporate Contribution)

The United States Attorney further charges:

41. The allegations contained in paragraphs 1 through 3, and 24 through 40 are repeated and realleged as though fully set forth herein.

42. From in or about June 2016, up to and including in or about October 2016, in the Southern District of New York and elsewhere, MICHAEL COHEN, the defendant, knowingly and willfully caused a corporation to make a contribution and expenditure, aggregating \$25,000 and more during the 2016 calendar year, to the campaign of a candidate for President of the United States, to wit, COHEN caused Corporation-1 to make and advance a \$150,000 payment to Woman-1, including through the promise of reimbursement, so as to ensure that Woman-1 did not publicize damaging allegations before the 2016 presidential election and thereby influence that election.

(Title 52, United States Code, Sections 30118(a) and 30109(d)(1)(A), and Title 18, United States Code, Section 2(b).)

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COUNT 8
(Excessive Campaign Contribution)

The United States Attorney further charges:

43. The allegations contained in paragraphs 1 through 3, and 24 through 40 are repeated and realleged as though fully set forth herein.

44. On or about October 27, 2016, in the Southern District of New York and elsewhere, MICHAEL COHEN, the defendant, knowingly and willfully made and caused to be made a contribution to Individual-1, a candidate for Federal office, and his authorized political committee in excess of the limits of the Election Act, which aggregated \$25,000 and more in calendar year 2016, and did so by making and causing to be made an expenditure, in cooperation, consultation, and concert with, and at the request and suggestion of one or more members of the campaign, to wit, COHEN made a \$130,000 payment to Woman-2 to ensure that she did not publicize damaging allegations before the 2016 presidential election and thereby influence that election.

(Title 52, United States Code, Sections 30116(a)(1)(A), 30116(a)(7), and 30109(d)(1)(A), and Title 18, United States Code, Section 2(b).)

Begin forwarded message:

From: Meghan Kelly <megkellyesq@yahoo.com>

Date: 2/21/2020

To: Kenneth Mcdowell <kennetha.mcdowell@state.de.us>, Anthony J Albence <anthony.albence@delaware.gov>, erikjschramm@gmail.com, Jesse Chadderdon <jesse@deldems.org>, Meghan Kelly <electmegkelly@icloud.com>, coe_campaignfinance@state.de.us, Meghan Kelly <megkellyesq@yahoo.com>

Subject: Bo/ is awesome even though this decision is not

Hi Bo and good morning Mr. Albence, Jesse and Honorable Chairman,

My waiver relates solely on religious reasons.

Even if I had the money, it would still violate my belief in Jesus's teachings since the money may be used to pay people to support or buy support for candidate's giving into the temptation of voting for whoever buys you. "owe nothing to anyone but to love them"

Candidates should not be bought, bartered by those who can afford to pay folks to create the illusion of popularity when in truth it is mere deep pockets.

In addition such money may be used to contribute to Matthew 6 violations leading many to harm and hell by teaching them to worship the mark of the beast.

This is no small matter for me Bo. I actually believe Jesus Christ and understand the Bible as the Holy Spirit was reflected out of certain people who laid down their will, their desires, by choosing God's will, God's purpose, despite the hardships it caused.

Bo, I do not want to attach checks on public record and thus compromise the accounts.

So I think I will include such payments on my pleading. So do not perform unnecessary legal research Attorney generals office or democrats.

I will show the fact that I paid the filing fee in the past and the Democratic contributions in the past, and will explain how I grew to understand this too violates Jesus's teachings.

I do not want to disobey Jesus and serve Satan by violating his teachings thereby misleading others to believe such evil is good. You are not the enemy despite disagreeing on me on the important issue. Injustice is the enemy.

I did not know it was evil. (It is possible that even adults like myself can learn and grow). I learned it was, as I discovered corruption even by our own party, Yipes. I do not want to compromise my soul by contributing to such corruption.

Bo, I might send you an email to confirm I have the dates right. (Bo is a Saint. He is like an angel sent by God. He patiently helped me with most of all the filings in 2018. This potential

law suit is not a reflection upon his kind efforts. It is a reflection upon the bad choice of those with the power to choose to persecute me based on my faith in Jesus Christ)

I am so happy to look through emails to see how kind you have been to me Bo. ♡ It is not your fault those in power made an unlawful decision Bo.

Thank you ♡

Exhibit 5

U.S. COURT OF APPEALS, THIRD CIRCUIT

Meghan Kelly)	
Appellant, Plaintiff,)	APPEALS COURT
v.)	CASE NUMBER: 21-3198
Disciplinary Counsel Patricia B. Swartz, Chief Disciplinary Counsel)	
David A. White, Disciplinary Counsel Kathleen M. Vavala, Office of Disciplinary Counsel, Board of Professional Responsibility for the Supreme Court of Delaware, the Preliminary Investigatory Committee, and Delaware Attorney General, Kathleen Jennings, in her capacity as Delaware Attorney General)	DISTRICT COURT
)	Civ. Action No: 21-1490 (CFC)
)	
)	DISTRICT COURT
)	JUDGE: The Honorable Chief Judge Colm F. Connelly
Appellees, Defendants.)	

Appellant Meghan Kelly’s Motion for permission to Appeal in Forma Pauperis

I, Meghan Kelly, pro se appellant, pursuant to 28 USCS § 1915, move the Honorable Third Circuit Court of Appeals for permission to appeal in forma pauperis the attached order from the Delaware District Court dated November 2, 2021, and memorandum related to the Order attached hereto, dated November 2, 2021, and submit the attached affidavit accompanying the Motion for permission to appeal in forma pauperis, as required by 28 USCS § 1915(a)(1), and related attachments included therein.

I am impoverished, and am not capable of pre-paying or paying court fees to defend the exercise of my Constitutionally protected rights to exercise religious belief, speech, petitioning the courts for grievances, and political and religious association without a grant of this motion.

I believe I am “entitled to redress.” Id. I pray the honorable Court considers the following issues.

I. Whether the District Court erred as a matter of law, overlooking or misunderstanding of the facts, and on Constitutional grounds in the Court's November 2, 2021 order, and Memorandum of Law, dated November 2, 2021 in:

1. Denying Plaintiff's motion to expedite,
2. Dismissing as moot Plaintiff's motions for temporary restraining order and exemption from bond, preliminary injunction and exemption from bond, motion to e-file with waiver of costs, and motion to appear remotely, under the discretion of the court due to poverty and to protect the parties and the court during a global pandemic,
3. Denying Plaintiff's letter-motion for emergency relief with permission to serve such letter/motion to Defendants along with the Complaint and other motions through the US Marshall.
4. Dismissing the case by abstaining under the Younger abstention doctrine, and
5. ordering the clerk to close the case,

Given the evidence shows the Delaware Supreme Court and Chancery Court or their members or agents incited or participated in the conspiracy to interfere, harass, or pressure me to forgo my case against former President Donald J. Trump, and substitution of President Biden for Donald J. Trump to protect my free exercise of religion, speech, and association from government sponsored persecution for such exercise, and to dissolve the establishment of government religion by seeking to enjoin former President Trump and current President Biden from enforcing executive orders creating a union of government-religious entity partnerships, including enjoinderment of Executive Order No. 13798, maintained and reestablished by President Biden by his enforcement of E.O. 13798, and President Biden's enforcement of Ex. Or. No.

13198, Jan. 29, 2001, as amended by Ex. Or. 14015, Feb. 14, 2021; Ex. Or. No. 13199, Jan. 29, 2001, as revoked by Ex. Or. No. 13831, May 3, 2018; Ex. Or. No. 13279, December 12, 2002, as amended by Exec. Or. No. 13559, November 17, 2010; Ex. Or. No. 13559, Nov. 17, 2010; Ex. Or. No. 13831, May 3, 2018, and Biden's enactment of Ex. Or. No. 14015, Feb. 14, 2021 ("executive orders"). These executive orders allow money or support to be transferred between government agents and religious organizations based on a bought or bartered for partnership between government and religion, not based on safeguarding freedom from forced government religion or forced relationships with religious entities to gain the bartered for government support through such religious entities.

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

The Chancery Court and Delaware Supreme Court's agents' or members' interference in *Kelly v Trump*, and participation in retaliation against me in instigating a petition to disbar me as an active attorney for the exercise of Constitutionally protected rights were motivated by their members' or agents' desire to suppress or demean or disapprove of my petitions, religious beliefs, speech, political association, and, or poverty in violation of the First Amendment applicable to the Defendants pursuant to the Fourteenth Amendment and in violation of 42 U.S.C. § 1985 (2)(b) or 42 U.S.C. § 1983.

The August 23, 2021 letter the District Court refers to in his memorandum refers to both Chancery Court and Delaware Supreme Court pleadings or petitions as the reason for the Defendants petition against me to disbar me as an active lawyer based on my faith in Jesus

Christ, per paragraph 7, in the petition. Though it is remarkable that the District Court offers assurance of the Delaware Supreme Court's jurisdiction while omitting the reference to the petitions to the Delaware Supreme Court as the source the Office of Disciplinary noted for the reason to bring a petition against me.

I petitioned the Delaware Supreme Court to suspend lawyer fees for lawyers out of work during the pandemic. The Court denied my request, indicating they would make determinations on a case-by-case basis.

I made a second request, noting I could not ask the honorable court to violate the Constitution by selective application towards me, as an attorney within a similarly situated class of lawyers facing economic hardship in violation of the Equal Protections Clause applicable to the Court pursuant to the Fourteenth Amendment.

No response was given by the Delaware Supreme Court. I paid the fees. Two months later, De-Lapp an arm of the Delaware Supreme Court and co-conspirator with the Defendants threatened me, requiring a response to their desire to investigate me within 10 days, based on my request for a waiver of fees to the court. How did they know to retaliate against me for the petition, unless the Delaware Supreme Court or their agent told them? De-Lapp's agents obviously were not concerned about helping me pay for the attorney active license registration fees since I made such payment two months before they threatened me.

The Delaware Supreme Court may have had pure motives, concern for poverty by reporting my poverty to the arm. Those motives appeared to turn sour since the Delaware Supreme Court never responded to my second letter relating to relief from lawyer registration fees.

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

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

The evidence shows a member of the Chancery Court appeared to seek to sabotage my case, by preventing me to almost miss my filing deadline, and by instructing me to cross off local counsel's address on my praecipe to prevent service, to prevent my case going forward based on her disagreement with my political, religious beliefs or to cover up mistakes or misbehavior. The same staff member appeared to write on my October 5, 2021 praecipes, and underline the praecipes I drafted on October 12, 2021 to testify and be a witness without cross examination for the appellate justices to gain clarification, instead of filing them as I presented them, unmarked. I do not want her to get into trouble.

In April, 2020, Judge Kenneth S. Clark of the Court of Common Pleas interrogated me at BJ's, a bulk grocery store, located in Millsboro, DE in a threatening matter, apparently backed by the Office of Disciplinary Counsel ("ODC"), disapproving of my religious beliefs and law suit.

The evidence, if accepted as pleaded shows the Delaware Supreme Court through its members or agents instigated the ODC's proceedings against me which creates manifest prejudice against me, or at least appeared to instigate the ODC's proceedings against me, giving

the appearance of lack of partiality, and the inability to grant me a fair trial in the above referenced matter.

Whether the Delaware District Court is the only court which may afford me a fair trial since the Chancery Court lacked jurisdiction to enjoin the Defendants' unlawful proceeding, as applied, since the facts arose in the Chancery and Delaware Supreme Courts, creating the appearance of lack of impartiality or actual partiality.

II. Whether the pleadings if accepted as true evidence the Delaware Supreme Court, the Preliminary Executive Committee, and Board of Professional Responsibility for the state of Delaware, lack subject matter jurisdiction due to illegality of the petition brought in retaliation against me for the exercise of my protected rights motivated by Defendants' desire to punish me based on my First Amendment exercise of the right to petition, associate, speak, exercise religion and, or poverty, requiring the issue to be remanded to the District Court.

III. Whether the pleadings if accepted as true evidence the Delaware Supreme Court, the Preliminary Executive Committee, and the Board of Professional Responsibility for the state of Delaware lack subject matter jurisdiction, based on violating my procedural and substantive due process grounds, as applied, since the Delaware Supreme Court appeared to participate in the Defendants' interference in my exercise of protected rights, and petition against me for the exercise of those rights, requiring the issue to be remanded to the District Court for consideration.

IV. Whether the Delaware Supreme Court, the Preliminary Executive Committee, and the Board of Professional Responsibility for the state of Delaware lack subject matter jurisdiction due to the fact the appellate court, the Delaware Supreme Court appeared to instigate, participate

in the interference in my law suit Kelly v Trump, and the retaliatory procedure Defendants brought, denying me of a fair trial as I cannot ask the Delaware Supreme Court members to be witnesses, to ask them about their apparent participation, in a case they preside over. Pursuant to Federal Rules of Evidence Rule 605, 28 U.S.C.A. 605, "The presiding judge[s] may not testify as a witness at the trial."

Whether the evidence if accepted as pleaded evidence the members of the Delaware Supreme Court are material witnesses to the facts relating to the Defendants' petition, and should dismiss or at least enjoin the petition based on lack of subject matter, to be remanded to the District Court.

V. Whether the petition must be dismissed by the Defendants under 28 USCS § 455 (b)(1) (5)(iv) and 28 USCS § 455, (a),(b)(1), since the Delaware Supreme Court members' impartiality might be reasonably be questioned as the facts evidence the Delaware Supreme Court's members or agents appeared to have instigated or participated in the ODC's and their agents' or co-arms interference with my case Kelly v Trump, and retaliation against me by bringing the petition I seek to enjoin, but for the exercise of protected freedoms, motivated to suppress my religious beliefs, speech and petitions.

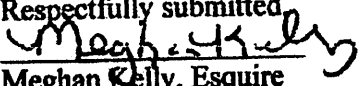
VI. Whether the facts pled which were not discussed by the district court, if proved, would show the proceeding brought by Defendants, is unlawful as applied, and the issue should be remanded to the district court for consideration.

VII. Whether my claims for infliction of emotional distress and potential damages which were not discussed by the district Court, should be remanded to the district court for consideration.

VIII. Whether in the interest of justice, I should be permitted to include a claim for nominal damages against the Defendants, in light of the expedited nature and irreparable injury I face.

Wherefore, I pray this court grants my request.

Dated December 6, 2021

Respectfully submitted

Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
Unrepresented indigent party,
Bar No. 4968, no phone
(word count 2,040)

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

Dated: ^{December} ~~November~~ 6, 2021

Meghan Kelly (printed)

Meghan Kelly (signed)

UNITED STATES COURT OF APPEALS
for the THIRD CIRCUIT

Meghan M. Kelly,
Appellant

v.
Disciplinary Counsel Primary B. Scott Dziedziuch
Counsel Kathleen M. Venable, Division Chief
Disciplinary Counsel Office of Disciplinary Counsel
Board of Professional Discipline of the Supreme
Court of the State of Delaware following investigation
Committee of Attorney Council Members

No. 21-3198

**AFFIDAVIT ACCOMPANYING MOTION
FOR PERMISSION TO APPEAL IN FORMA PAUPERIS**

Affidavit in Support of Motion	Instructions
<p>I swear or affirm under penalty of perjury that, because of my poverty, I cannot prepay the docket fees of my appeal or post a bond for them. I believe I am entitled to redress. I swear or affirm under penalty of perjury under United States laws that my answers on this form are true and correct. (28 U.S.C. § 1746; 18 U.S.C. § 1621.)</p> <p>Signed: <u>Meghan Kelly</u></p>	<p>Complete all questions in this application and then sign it. Do not leave any blanks: if the answer to a question is "0," "none," or "not applicable (N/A)," write that response. If you need more space to answer a question or to explain your answer, attach a separate sheet of paper identified with your name, your case's docket number, and the question number.</p> <p>Date: <u>Dec. 6, 2021</u></p>

My issues on appeal are: please see attached I need more space to answer this question, and explain this answer.

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	\$ 600.00	\$ 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):	\$ 166.67	\$ 0	\$ 0	\$ 0
Total monthly income:	\$ 766.67	\$ 0	\$ 0	\$ 0

2. List your 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

N/A	N/A	N/A	\$ 0
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
N/A	N/A	N/A	\$ 0
N/A	N/A	N/A	\$ 0

4. How much cash do you and your spouse have? \$ 6000

Below, state any money you or your spouse have in bank accounts or in any other financial institution.

Financial Institution	Type of Account	Amount you have	Amount your spouse has
Fulton Bank	Checking	\$ 236.14	\$ 0
N/A	N/A	\$ 0	\$ 0
N/A	N/A	\$ 0	\$ 0

If you are a prisoner, you must attach a statement certified by the appropriate institutional officer showing all receipts, expenditures, and balances during the last six months in your institutional accounts. If you have multiple accounts, perhaps because you have been in multiple institutions, attach one certified statement of each account.

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

Home	Other real estate	Motor vehicle #1
(Value) \$ 0	(Value) \$ 0	(Value) \$ 7,000.
N/A	N/A	Make and year: Toyota, 2014

N/A	N/A	Model: Corolla
		Registration #: 2TABORH5EC 122541

Motor vehicle #2	Other assets	Other assets
(Value) \$ 0	(Value) \$ 0	(Value) \$ 0
Make and year: N/A	N/A	N/A
Model: N/A	N/A	N/A
Registration #: N/A	N/A	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	\$ 0	\$ 0
N/A	\$ 0	\$ 0
N/A	\$ 0	\$ 0
N/A	\$ 0	\$ 0

7. State the persons who rely on you or your spouse for support.

Name [or, if a minor (i.e., underage), initials only]	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, semiannually, or annually to show the monthly rate.

	You	Your Spouse
Rent or home-mortgage payment (including lot rented for mobile home) Are real estate taxes included? Yes <input type="radio"/> No <input checked="" type="radio"/> Is property insurance included? Yes <input type="radio"/> No <input checked="" type="radio"/>	\$ 0	\$ 0
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ 0	\$ 0
Home maintenance (repairs and upkeep)	\$ 40.00	\$ 0
Food	\$ 6	\$ 0
Clothing	\$ 20.00	\$ 0
Laundry and dry-cleaning	\$ 30.00	\$ 0
Medical and dental expenses	\$ 40.00	\$ 0
Transportation (not including motor vehicle payments)	\$ 150.00	\$ 0
Recreation, entertainment, newspapers, magazines, etc.	\$ 0	\$ 0
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's:	\$ 0	\$ 0
Life:	\$ 0	\$ 0
Health:	\$ 0	\$ 0
Motor vehicle:	\$ 70.00	\$ 0
Other: Printing, printer, ink, paper, computer, etc.	\$ 200.00	\$ 0
Taxes (not deducted from wages or included in mortgage payments) (specify):	\$ 0	\$ 0
Installment payments		
Motor Vehicle:	\$ 0	\$ 0
Credit card (name):	\$ 0	\$ 0
Department store (name):	\$ 0	\$ 0
Other: Pay back gift to parents once employed	\$ 600.00	\$ 0
Alimony, maintenance, and support paid to others	\$ 0	\$ 0

Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ 0	\$ 0
Other (specify): <u>License to practice law</u>	\$ 29.42	\$ 0
Total monthly expenses:	\$ 1,179.42	\$ 0

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? \$ 0
 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? \$ 0
 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 docket fees for your appeal. *The Defendant's petition prevent me to complete my job back as a real estate lawyer. There is no global payment and I am not likely to find any alternative work. I may work for a few of Defendant's team one or two of my coworkers as a lawyer based on my religious beliefs. I am unable to the fees of my priority and will pay back the fees they want me if I can't. If I can't, they will be side me my debts.*

13. State the [city and state] of your legal residence.

Daysboro, DE

Your daytime phone number: () N/A, No phone

Your age: 43 Your years of schooling: 21

Meghan Kelly

Docket Number 21-2198

Initial Question, No question Number

My issues on appeal are:

1. Whether the District Court erred as a matter of law, overlooking or misunderstanding of the facts, and on Constitutional grounds in the Court's November 2, 2021 order, and Memorandum of Law, dated November 2, 2021 in:

1. Denying Plaintiff's motion to expedite,
2. Dismissing as moot Plaintiff's motions for temporary restraining order and exemption from bond, preliminary injunction and exemption from bond, motion to e-file with waiver of costs, and motion to appear remotely, under the discretion of the court due to poverty and to protect the parties and the court during a global pandemic,
3. Denying Plaintiff's letter-motion for emergency relief with permission to serve such letter/motion to Defendants along with the Complaint and other motions through the US Marshall.
4. Dismissing the case by abstaining under the *Younger* abstention doctrine, and
5. ordering the clerk to close the case,

Given the evidence shows the Delaware Supreme Court and Chancery Court or their members or agents incited or participated in the conspiracy to interfere, harass, or pressure me to forgo my case against former President Donald J. Trump, and substitution of President Biden for Donald J. Trump to protect my free exercise of religion, speech, and association from

government sponsored persccution for such exercisc, and to dissolve the establishment of government religion by seeking to enjoin former President Trump and current President Biden from enforcing executive orders creating a union of government-religious entity partnerships, including enjoiment of Executive Order No. 13798, maintained and reestablished by President Biden by his enforcement of E.O. 13798, and President Biden's enforcement of Ex. Or. No. 13198, Jan. 29, 2001, as amended by Ex. Or. 14015, Feb. 14, 2021; Ex. Or. No. 13199, Jan. 29, 2001, as revoked by Ex. Or No. 13831, May 3, 2018; Ex. Or. No. 13279, December 12, 2002, as amended by Exec. Or. No. 13559, November 17, 2010; Ex. Or. No. 13559, Nov. 17, 2010; Ex Or. No. 13831, May 3, 2018, and Biden's enactment of Ex. Or. No. 14015, Feb. 14, 2021 ("executive orders"). These executive orders allow money or support to be transferred between government agents and religious organizations based on a bought or bartered for partnership between government and religion, not based on safeguarding freedom from forced government religion or forced relationships with religious entities to gain the bartered for government support through such religious entities.

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

The Chancery Court and Delaware Supreme Court's agents' or members' interference in *Kelly v Trump*, and participation in retaliation against me in instigating a petition to disbar me as an active attorney for the exercise of Constitutionally protected rights were motivated by their members' or agents' desire to suppress or demean or disapprove of my petitions, religious beliefs, speech, political association, and, or poverty in violation of the First Amendment

applicable to the Defendants pursuant to the Fourteenth Amendment and in violation of 42 U.S.C. § 1985 (2)(b) or 42 U.S.C. § 1983.

The August 23, 2021 letter the District Court refers to in his memorandum refers to both Chancery Court and Delaware Supreme Court pleadings or petitions as the reason for the Defendants petition against me to disbar me as an active lawyer based on my faith in Jesus Christ, per paragraph 7, in the petition. Though it is remarkable that the District Court offers assurance of the Delaware Supreme Court's jurisdiction while omitting the reference to the petitions to the Delaware Supreme Court as the source the Office of Disciplinary noted for the reason to bring a petition against me.

I petitioned the Delaware Supreme Court to suspend lawyer fees for lawyers out of work during the pandemic. The Court denied my request, indicating they would make determinations on a case-by-case basis.

I made a second request, noting I could not ask the honorable court to violate the Constitution by selective application towards me, as an attorney within a similarly situated class of lawyers facing economic hardship in violation of the Equal Protections Clause applicable to the Court pursuant to the Fourteenth Amendment.

No response was given by the Delaware Supreme Court. I paid the fees. Two months later, De-Lapp an arm of the Delaware Supreme Court and co-conspirator with the Defendants threatened me, requiring a response to their desire to investigate me within 10 days, based on my request for a waiver of fees to the court. How did they know to retaliate against me for the petition, unless the Delaware Supreme Court or their agent told them? De-Lapp's agents

obviously were not concerned about helping me pay for the attorney active license registration fees since I made such payment two months before they threatened me.

The Delaware Supreme Court may have had pure motives, concern for poverty by reporting my poverty to the arm. Those motives appeared to turn sour since the Delaware Supreme Court never responded to my second letter relating to relief from lawyer registration fees.

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

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

The evidence shows a member of the Chancery Court appeared to seek to sabotage my case, by preventing me to almost miss my filing deadline, and by instructing me to cross off local counsel's address on my praecipe to prevent service, to prevent my case going forward based on her disagreement with my political, religious beliefs or to cover up mistakes or misbehavior. The same staff member appeared to write on my October 5, 2021 praecipes, and underline the praecipes I drafted on October 12, 2021 to testify and be a witness without cross examination for the appellate justices to gain clarification, instead of filing them as I presented them, unmarked. I do not want her to get into trouble.

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

Whether the Delaware District Court is the only court which may afford me a fair trial since the Chancery Court lacked jurisdiction to enjoin the Defendants' unlawful proceeding, as applied, since the facts arose in the Chancery and Delaware Supreme Courts, creating the appearance of lack of impartiality or actual partiality.

II. Whether the pleadings if accepted as true evidence the Delaware Supreme Court, the Preliminary Executive Committee, and Board of Professional Responsibility for the state of Delaware, lack subject matter jurisdiction due to illegality of the petition brought in retaliation against me for the exercise of my protected rights motivated by Defendants' desire to punish me based on my First Amendment exercise of the right to petition, associate, speak, exercise religion and, or poverty, requiring the issue to be remanded to the District Court.

III. Whether the pleadings if accepted as true evidence the Delaware Supreme Court, the Preliminary Executive Committee, and the Board of Professional Responsibility for the state of Delaware lack subject matter jurisdiction, based on violating my procedural and substantive due process grounds, as applied, since the Delaware Supreme Court appeared to participate in the

Defendants' interference in my exercise of protected rights, and petition against me for the exercise of those rights, requiring the issue to be remanded to the District Court for consideration.

IV. Whether the Delaware Supreme Court, the Preliminary Executive Committee, and the Board of Professional Responsibility for the state of Delaware lack subject matter jurisdiction due to the fact the appellate court, the Delaware Supreme Court appeared to instigate, participate in the interference in my law suit Kelly v Trump, and the retaliatory procedure Defendants brought, denying me of a fair trial as I cannot ask the Delaware Supreme Court members to be witnesses, to ask them about their apparent participation, in a case they preside over. Pursuant to Federal Rules of Evidence Rule 605, 28 U.S.C.A. 605, "The presiding judge[s] may not testify as a witness at the trial."

Whether the evidence if accepted as pleaded evidence the members of the Delaware Supreme Court are material witnesses to the facts relating to the Defendants' petition, and should dismiss or at least enjoin the petition based on lack of subject matter, to be remanded to the District Court.

V. Whether the petition must be dismissed by the Defendants under 28 USCS § 455 (b)(1) (5)(iv) and 28 USCS § 455, (a),(b)(1), since the Delaware Supreme Court members' impartiality might be reasonably be questioned as the facts evidence the Delaware Supreme Court's members or agents appeared to have instigated or participated in the ODC's and their agents' or co-arms interference with my case Kelly v Trump, and retaliation against me by bringing the petition I seek to enjoin, but for the exercise of protected freedoms, motivated to suppress my religious beliefs, speech and petitions.

VI. Whether the facts pled which were not discussed by the district court, if proved, would show the proceeding brought by Defendants, is unlawful as applied, and the issue should be remanded to the district court for consideration.

VII. Whether my claims for infliction of emotional distress and potential damages which were not discussed by the district Court, should be remanded to the district court for consideration.

VIII. Whether in the interest of justice, I should be permitted to include a claim for nominal damages against the Defendants, in light of the expedited nature and irreparable injury I face.

Meghan Kelly

Docket Number 21-2198

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

My parents gave me the Toyota Corolla because they were ashamed of my ugly car I drove when I ran for office. I wish I kept my ugly car. No one would ever steal because it was so ugly, but it ran so well.

My parents requested I get rid of my previous vehicle, and take my father, the legendary Coach Pat Kelly's vehicle. My parents sometimes forget they gave me my dad's car, and are stressed about money as many are during the pandemic and designed runaway inflation. Sometimes they require I pay for it back if I am able, but I think my dad needs it back. He needs a car, and my old law firm would give me a company vehicle, upon employment, which would

work well for my family. I would like to give the car back to my parents, if I get my old job back as planned. On an aside, my father taught Civics, coached basketball and life guarded in Sussex County, Delaware. My dad combatted racism with love by teaching students they were loved regardless of material worth, race, religion or place of origin and required they respect each other, unearned. Since, my dad, the legendary Pat Kelly and beautiful mother, Mary Kelly, left Delaware to live in Florida I noticed racism, perceived foreign persecution and nationalism have picked up in my home town. I hope this Court will be the hero the world needs on a grander level than my father by teaching citizens they are valued regardless of material worth, race, religion or place of origin, and to respect the inherent dignity and worthiness of life others have, unearned, required. People are the treasure, not money and material things. The later is moth and rust.

Meghan Kelly

Docket Number 21-2198

Question 12. Provide any other information that will help explain why you cannot pay the docket fees for your appeal.

The Delaware District Court approved my motion to file in forma pauperis per the attached, labeled exhibit 1.

I am approved for food stamps, per the attached confirmation, labeled as Exhibit 2.

In addition, I have not worked since December 14, 2018, per the attached letter from Cape Henlopen School District, labeled at Exhibit 3.

I took a sabbatical to work, free of charge, to encourage federal law makers to pass legislation.

I tried to garner support to pass House Resolution 341 to prevent offshore drilling by removing the stator power granting former President Trump authority to grant leases through his executive order.

In addition, since I studied the history of medicine in a course at University of Delaware, and healthcare law and healthcare finance in law school, I proposed legislative solutions to improve

I also proposed ways to fully fund social security.

I contacted all 541 federal law makers, either by phone, fax, email, letter or postcard in an attempt to get them to impeach President Trump based on one of the five proposals I drafted, to no avail. My money ran out, but my desire for justice and mercy by using the law for correction, not condemnation had not run out.

So, I applied for legislative attorney positions in hopes to draft just laws.

I also attempted to run for President of the United States. I contacted all 50 states' and some of the territories' Department of Elections concerning waivers of the signature and filing fees so as not to require my religious beliefs to run for office, with no success in grants. I asked the ACLU for help in most states, but was rejected. No one would help me. Maybe, I am the help.

I focused additional time, working for free, without pay to run for the federal House of representatives without violating my religious beliefs by asking for signatures or donations or

paying filing fees, as I believe such requirements make the government seats for sale, not based on free choice by the people by vote, but the bought choice of only those who could bribe or buy candidates to bend their wills through money or support in violation of Jesus the Christ's teachings. I believe requiring signatures and money is also in violation of Jesus the Christ's teachings in Matthew 6:1-4¹, misleading the majority of people in office to hell, without repentance, and those they mislead the public to the second death too by focusing their eyes on money driving out their eyes looking at others outside of their own with love, what Jesus teaches is the evil eye. ²

¹ 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. 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."

² In Matthew 6:22-24 "The light of the body is the eye: if therefore thine eye be good, thy whole body shall be full of light. But if thine eye be evil, thy whole body shall be full of darkness. If therefore the light that is in thee be darkness, how great is that darkness! No man can serve two masters: for either he will hate the one, and love the other; or else he will hold to the one, and despise the other. Ye cannot serve God and money. *See, Matthew 5:29* "If your right eye causes you to stumble, gouge it out and throw it away. It is better for you to lose one part of your body than for your whole body to be thrown into hell." *Also see, Matthew 18:9* "And if your eye causes you to stumble, gouge it out and throw it away. It is better for you to enter life with one eye than to have two eyes and be thrown into the fire of hell. I do not believe Jesus means for us to pluck out our eye balls, but to pluck out the evil in our eyes, looking at others with lusts, what you can get for your own instead of love, by plucking out the evil in our minds, what the Bible calls our foreheads, and in our hearts giving into temptations for lusts to make merchants money, driving out our love for one another. Jesus teaches he speaks in parables so those with hardness of hearts who reflect the devil's image, not yet saved from the second death, will not understand, and those who choose to lay down human desires to love do understand, the saved. *Matthew 13:11.*

The pandemic hit in 2020, and I gave up my aspirations of making a difference by gaining a position in government to draft just laws that care for people, while repealing unjust decrees which focus on profit at the cost of sacrificing individual liberties, people's lives, health and the environment.

I was also negotiating and hoping to get my old job back, with my former law firm, where I would be performing real estate settlements, but the Defendants' wrongful retaliation against me prevent me from gaining the position, and may cause my former law firm to lose interest in me. Hence, I have no income, and the Defendants may cut off prospects for me to earn income, should they deem me as unworthy of working as mentally disabled, which is quite insulting for merely believing, and thinking differently, and petitioning the Court to allow me to speak, think and believe differently based on my religious exercise and beliefs than the government agents' forced worship of what I believe is the mark of the beast, business greed.

I also have religious reasons related to the pandemic for not working. I am a Christian. I believe people go to hell for prescribing and accepting our harmful health care. Since we are in a global pandemic, I am seeking to avoid getting sick, to avoid being damned to hell by forced healthcare that may kill my life and eternal life. I actually wanted to go back to my old law firm, and was negotiating for a position, but the pandemic hit. I previously decided it was not worth the risk of losing my life and eternal life at this time, should the law firm still be interested in me in light of my unpopular beliefs as a believer in Jesus the Christ. With the threat of the Defendants deeming me unworthy of work due to my religious beliefs, petitions, speech and associations, and the Delaware Supreme Court's permission to perform real estate settlements remotely, I would take my old job back immediately should they give me an offer, even during the pandemic, due to the kind accommodations the Delaware Supreme Court granted to real

estate lawyers to keep people alive, and the threats Defendants pose towards my reputation and ability to work ever again in any field.

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

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 I believe, 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. Individuals within pharmaceutical entities who have paid out money in law suits are still able to be rewarded some of the roughly 33 billion a year in NIH fundings. People within entities, investors or otherwise, are permitted to make

money off of the alleged cure too, despite recent judgments against them, through their antics which shields them from personal concern or responsibility. Injustice continues. I believe money is the problem, 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 based on freedom of thought, speech, criticism and debate, than an otherwise free market would create. Our current system constrains free will, by increasing the temptations to conform to 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 encourage them 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, to truly care for the health and lives of the people they serve, the patients.

I also believe healthcare professionals sin by taking the life blood, or organs from people to perform studies on or to use on other patients. See, *Leviticus* 17:14, *Genesis* 9:4-5. I only realized this recently as I looked into sinister tests of blood for wicked gain, not good. See for example attached here as Exhibit 4 the article available at <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.³ So, I do not eat things with gelatin or gel cap medicine in them. By cremating bones people show they do not care to know God or love God. God teaches our loved ones are not in heaven or thrown into the fire of the second death yet. The bible teaches about the resurrection of the bones with a potential new body to be judged for eternal life or the second death. See, e.g. Revelation 20:13, Ezekiel Chapter 37, Matthew 25:32-46. Many self-proclaimed 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.

³ In *Amos* 2:1, people got into trouble with God for cremating a king's bones. I believe they will be damned to hell, even marketing or encouraging cremations to save money, I believe will damn people to hell for their careless words to serve the mark of the beast, business greed, at eternal human sacrifice, should they not repent of such evil. The Bible teaches ignorance is not innocence to God with regards to confusing love verses people pleasing lusts. This is what the LORD says: "For three sins of Moab, even for four, I will not relent. Because he burned to ashes the bones of Edom's king." The material gain is never worth human sacrifice or human eternal sacrifice. People are the treasures. Money should serve people. People should not be controlled by money and sacrificed for others to gain money.

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. See Exhibit 5 for pages of the book relating to Frankensteinish care under the guise of healthcare, even "designer babies". Please note, the book describes the metaverse attributes, the space waste to waste money to make banks, or those who control currency power to control the world through enslaving the world to debt, and other information relevant today. I believe the items discussed in the book were already created back in 2016 or before then. But wrongdoers used and are using psychology, which I believe teaches the marked of the beast, the damned as fact, to manipulate and condition the masses to implement their scheme to overthrow government authority to take control of not only the United State's citizens, but the globe.⁴ The

⁴ Please note, the former Presidents, Obama, Bushes, Clinton, Trump and even Vice President Biden, and Mr. Trump's daughter attended the world economic forum meetings. So, they are in the know, or should be in the know of the controlled, stifling innovation with money, not free economy improving the economy with something more valuable than money, the freely shared thoughts of humanity to improve products and services. The schemes will sacrifice retirement and healthcare for the baby boomers to save money should the courts not save our elderly and the world. The other two branches are too scared to lose their support for their seats to do the right thing without the honorable court's help, to help them bravely do the right thing, love humanity over money, instead of human sacrifice for money. The inflation is by design, with planted scape goats. The donors are playing both parties, blinding their eyes with money and support. I pray this Honorable court sees clearly, to be the hero we need, to prevent the

entire book is attached as an exhibit within the docket, at D.I. 3 at District Court Exhibit 8. 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 of knowledge tied to culpability, by delegation of duties as innocence. So, knowing of harm to prevent harm is sadly discouraged.

Since the pandemic appears to be getting worse, I am not likely to find safe employment other than with my former law firm, if they still are interested in me, and am without income to pay for Court fees. Thank you for your kind consideration.

foreseeable planned harm or reverse it down the line, which is possible, no matter what anyone argues.

Exhibit 1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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

ORDER

At Wilmington this ~~28th~~ day of October, 2021,

the Court having considered the application to proceed in District Court without prepaying fees or costs under 28 U.S.C. § 1915;

IT IS ORDERED that the application is GRANTED.



 UNITED STATES DISTRICT JUDGE

Exhibit 2



Notice to Approve Your Food Benefits

State of Delaware Division of Social Services



000100003300010000

September 21, 2021

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

Do you need help with benefits or other services? If you need help, please call 1-800-372-2022.
¿Necesita ayuda con beneficios u otros servicios? Si necesita ayuda, llame al número de teléfono al cliente al 1-800-372-2022.

Do you know about our ASSIST online services? If you use our online services, you may not have to come into the office. ASSIST makes it easier to:
• View a summary of your benefits
• Request other services
• Report a change
• Renew an application or renewal
You can access ASSIST at <http://www.dss.delaware.gov>

? Do you know about our ASSIST online services? If you use our online services, you may not have to come into the office. ASSIST makes it easier to:
 • View a summary of your benefits
 • Request other services
 • Report a change
 • Renew an application or renewal
 You can access ASSIST at <http://www.dss.delaware.gov>

Your Application for food benefits was APPROVED.

Benefits Period(s)	Benefit Amount
October 1, 2021 - March 31, 2022	\$ 250.00

Name(s)	Eligible Benefit Period
Meghan M Kelly	October 1, 2021 - March 31, 2022

You will receive a renewal. To complete your renewal, you must complete these 3 easy steps:

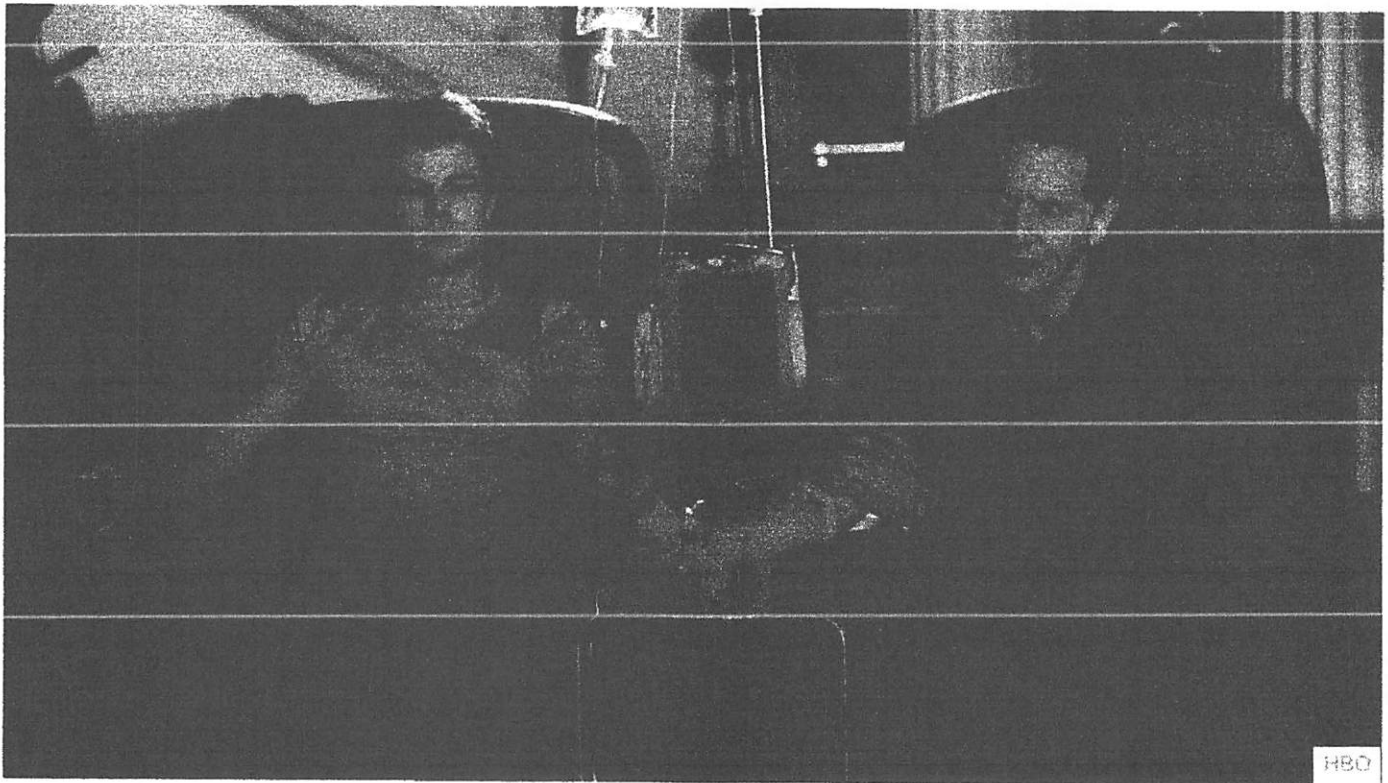
1. Answer all of the questions
2. Sign the renewal
3. Return your renewal by mail, fax, or drop it off to your local DSS office

The rules we used to take this action are: 9044 DSSM

! If you do not agree with this action, you have the right to a fair hearing. Read the last page of this notice to see how to ask for a fair hearing. **!**

Exhibit 3

Exhibit 4



The super rich are injecting blood from teenagers to gain ‘immortality’

Tomasz Frymorgen

25 August 2017

News | Health & Wellbeing

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If you're a millennial, you might have felt for a while now that older generations are **out to suck us dry**.

To their Yin of affordable housing, secure jobs and actual pensions, we seem to have the Yang of **six-figure car garages for homes**, ‘gigs’ for jobs, and a retirement age that like a mirage on the horizon, seems to get further away the closer you get to it.

Avocados on toast aside, it's pretty clear that Yang is not doing well in this relationship.

But the bloodsucking appears to have become a whole lot more literal.

Because the super-wealthy are now pumping themselves with the blood of young people in an attempt to prevent themselves from ageing.

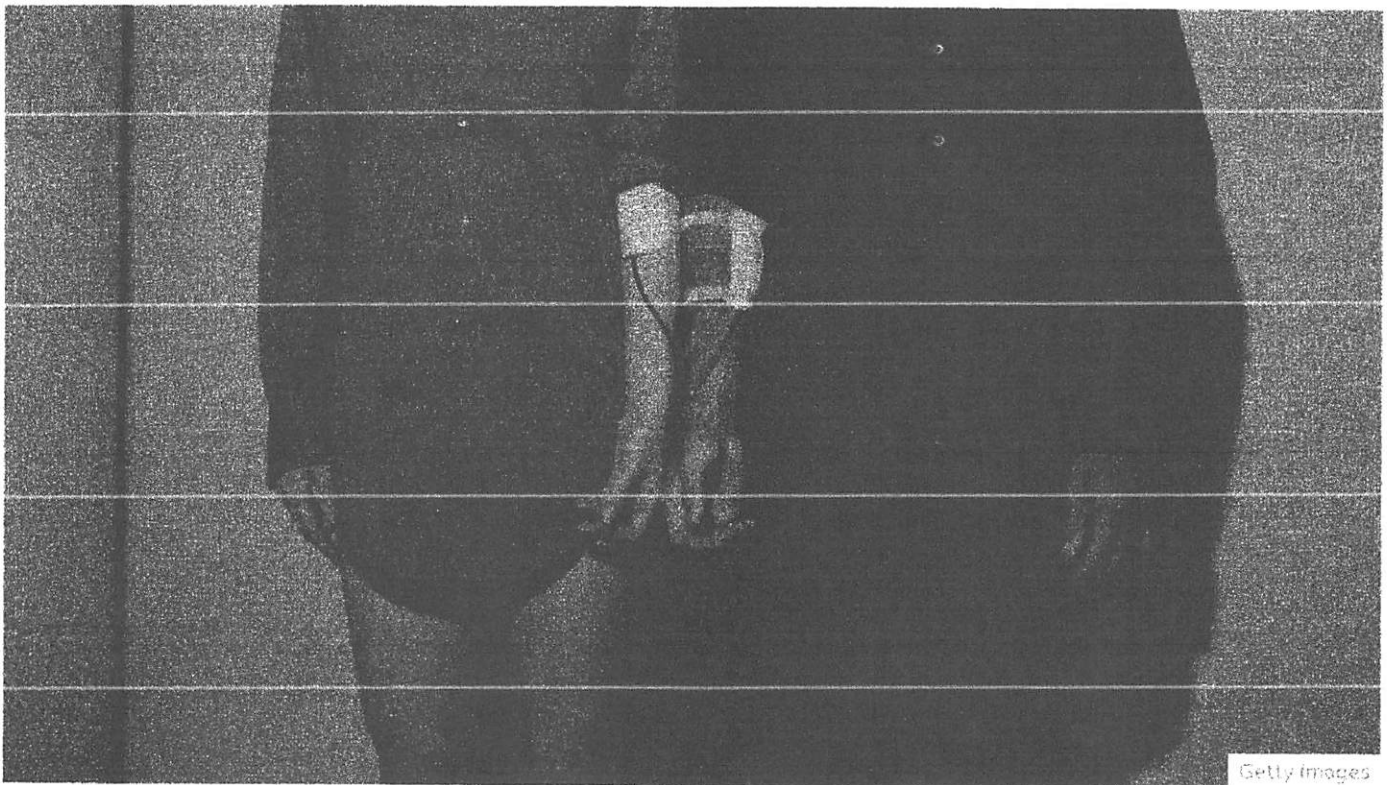
Over 100 people have participated in a clinical trial at a San Francisco start-up offering blood transfusions for older patients. Each procedure costs \$8,000 (£6,200) and sees the patient injected with two and a half litres of plasma – the liquid element of blood that remains after other cells have been removed - taken from young people.

The procedure is being offered as an experimental attempt at rejuvenating the elderly. The median age of the patients is 60 years.

Jesse Karmazin, 32, a Stanford-trained scientist who founded the US clinic, told The Sunday Times that the initial results from his patients **had been encouraging** .

“It could help improve things such as appearance or diabetes or heart function or memory. These are all the aspects of ageing that have a common cause.

“I’m not really in the camp of saying this will provide immortality but I think it comes pretty close, essentially.”



The new treatment comes on the back of several studies over the last 17 years in which Stanford researchers have shown the joining of circulatory systems (known as parabiosis) between old and young mice to be effective in **rejuvenating organs, muscles and stem cells** .

Additionally, a study last year found that the plasma of young people itself had a **rejuvenating effect when injected into older mice** .

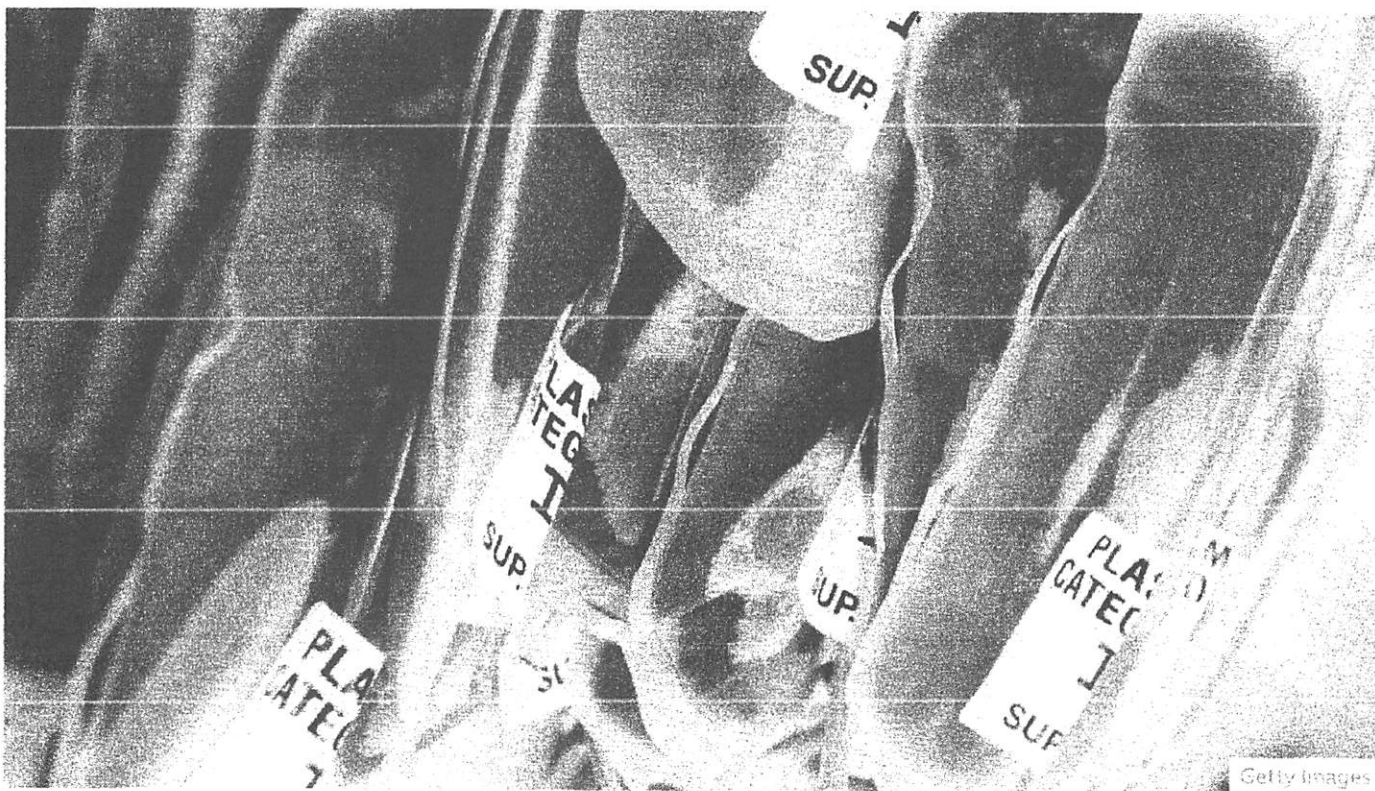
However, despite the results of the mice-based studies, researchers have attacked the scientific validity of Karmazin's experiment and raised a number of ethical concerns.

"There's just no clinical evidence [that the treatment will be beneficial]," **argues Tony Wyss-Coray**, the Stanford neuroscientist behind a key 2014 mice parabiosis study. For one thing, Karmazin's trial does not use a placebo control group and participants can be as young as 35.

Critics have also pointed to the dangers of unnecessarily exposing people to the potential risks of blood transfusions, which **include hives, lung injury and fatal infections** .

Others have argued that the treatment amounts to a scam exploiting the hype around the untested medical properties of young people's blood.

"People want to believe that young blood restores youth, even though we don't have evidence that it works in humans and we don't understand the mechanism of how mice look younger," Wyss-Coray told **the MIT Technology Review**.



And then there's the murky ethics of buying blood that young people might have thought they were donating to those in medical need, and using it for expensive, experimental treatments.

While US plasma donation sites normally offer a stipend of \$20-50 (£16-39), they emphasise the life-saving treatments that donations can support, using patient testimonies.

And with a disproportionate number of America's poorest people **regularly donating plasma to make ends meet**, this paints a very different picture to the strange world of regenerative medicine, **where hundreds of millions of dollars are being invested by the super rich** in a bid to outsmart ageing, or even death.

Karmazin has responded to criticisms by saying **his study has passed ethical review**. In response to criticism about the trial's cost and methodology, he adds that it would be **unfair to give paying participants a placebo**.

And, he argues, his patients are immediately **reaping the rewards of his treatment**: "We're already seeing people look better after just one treatment."

"It's like plastic surgery from the inside out."

Hmm. With pale teenagers, immortality and a lot of blood, it all sounds a bit Twilight to us.

Share this:    

Exhibit 5

World Economic Forum®

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One of the main bridges between the physical and digital applications enabled by the fourth industrial revolution is the internet of things (IoT) – sometimes called the “internet of all things”. In its simplest form, it can be described as a relationship between things (products, services, places, etc.) and people that is made possible by connected technologies and various platforms.

Sensors and numerous other means of connecting things in the physical world to virtual networks are proliferating at an astounding pace. Smaller, cheaper and smarter sensors are being installed in homes, clothes and accessories, cities, transport and energy networks, as well as manufacturing processes. Today, there are billions of devices around the world such as smart phones, tablets and computers that are connected to the internet. Their numbers are expected to increase dramatically over the next few years, with estimates ranging from several billions to more than a trillion. This will radically alter the way in which we manage supply chains by enabling us to monitor and optimize assets and activities to a very granular level. In the process, it will have transformative impact across all industries, from manufacturing to infrastructure to healthcare.

Consider remote monitoring – a widespread application of the IoT. Any package, pallet or container can now be equipped with a sensor, transmitter or radio frequency identification (RFID) tag that allows a company to track where it is as it moves through the supply chain – how it is performing, how it is being used, and so on. Similarly, customers can continuously track (practically in real time) the progress of the package or document they are expecting. For companies that are in the business of operating long and complex supply chains, this is transformative. In the near future, similar monitoring systems will also be applied to the movement and tracking of people.

The digital revolution is creating radically new approaches that revolutionize the way in which individuals and institutions engage and collaborate. For example, the blockchain, often described as a “distributed ledger”, is a secure protocol where a network of computers collectively verifies a transaction before it can be recorded and approved. The technology that underpins the blockchain creates trust by enabling people who do not know each other (and thus have no underlying basis for trust) to collaborate without having to go through a neutral central authority – i.e. a

custodian or central ledger. In essence, the blockchain is a shared, programmable, cryptographically secure and therefore trusted ledger which no single user controls and which can be inspected by everyone.

Bitcoin is so far the best known blockchain application but the technology will soon give rise to countless others. If, at the moment, blockchain technology records financial transactions made with digital currencies such as Bitcoin, it will in the future serve as a registrar for things as different as birth and death certificates, titles of ownership, marriage licenses, educational degrees, insurance claims, medical procedures and votes – essentially any kind of transaction that can be expressed in code. Some countries or institutions are already investigating the blockchain’s potential. The government of Honduras, for example, is using the technology to handle land titles while the Isle of Man is testing its use in company registration.

On a broader scale, technology-enabled platforms make possible what is now called the on-demand economy (referred to by some as the sharing economy). These platforms, which are easy to use on a smart phone, convene people, assets and data, creating entirely new ways of consuming goods and services. They lower barriers for businesses and individuals to create wealth, altering personal and professional environments.

The Uber model epitomizes the disruptive power of these technology platforms. These platform businesses are rapidly multiplying to offer new services ranging from laundry to shopping, from chores to parking, from home-stays to sharing long-distance rides. They have one thing in common: by matching supply and demand in a very accessible (low cost) way, by providing consumers with diverse goods, and by allowing both parties to interact and give feedback, these platforms therefore seed trust. This enables the effective use of under-utilized assets – namely those belonging to people who had previously never thought of themselves as suppliers (i.e. of a seat in their car, a spare bedroom in their home, a commercial link between a retailer and manufacturer, or the time and skill to provide a service like delivery, home repair or administrative tasks).

The on-demand economy raises the fundamental question: What is worth owning – the platform or the underlying asset? As media strategist Tom Goodwin wrote in a TechCrunch article in March 2015: “Uber, the world’s largest taxi company, owns no vehicles. Facebook, the world’s most

popular media owner, creates no content. Alibaba, the most valuable retailer, has no inventory. And Airbnb, the world's largest accommodation provider, owns no real estate."²

Digital platforms have dramatically reduced the transaction and friction costs incurred when individuals or organizations share the use of an asset or provide a service. Each transaction can now be divided into very fine increments, with economic gains for all parties involved. In addition, when using digital platforms, the marginal cost of producing each additional product, good or service tends towards zero. This has dramatic implications for business and society that I will explore in Chapter Three.

2.1.3 Biological

Innovations in the biological realm – and genetics in particular – are nothing less than breath-taking. In recent years, considerable progress has been achieved in reducing the cost and increasing the ease of genetic sequencing, and lately, in activating or editing genes. It took more than 10 years, at a cost of \$2.7 billion, to complete the Human Genome Project. Today, a genome can be sequenced in a few hours and for less than a thousand dollars.¹⁰ With advances in computing power, scientists no longer go by trial and error; rather, they test the way in which specific genetic variations generate particular traits and diseases.

Synthetic biology is the next step. It will provide us with the ability to customize organisms by writing DNA. Setting aside the profound ethical issues this raises, these advances will not only have a profound and immediate impact on medicine but also on agriculture and the production of biofuels.

Many of our intractable health challenges, from heart disease to cancer, have a genetic component. Because of this, the ability to determine our individual genetic make-up in an efficient and cost-effective manner (through sequencing machines used in routine diagnostics) will revolutionize personalized and effective healthcare. Informed by a tumour's genetic make-up, doctors will be able to make decisions about a patient's cancer treatment.

While our understanding of the links between genetic markers and disease is

still poor, increasing amounts of data will make precision medicine possible, enabling the development of highly targeted therapies to improve treatment outcomes. Already, IBM's Watson supercomputer system can help recommend, in just a few minutes, personalized treatments for cancer patients by comparing the histories of disease and treatment, scans and genetic data against the (almost) complete universe of up-to-date medical knowledge.¹¹

The ability to edit biology can be applied to practically any cell type, enabling the creation of genetically modified plants or animals, as well as modifying the cells of adult organisms including humans. This differs from genetic engineering practiced in the 1980s in that it is much more precise, efficient and easier to use than previous methods. In fact, the science is progressing so fast that the limitations are now less technical than they are legal, regulatory and ethical. The list of potential applications is virtually endless – ranging from the ability to modify animals so that they can be raised on a diet that is more economical or better suited to local conditions, to creating food crops that are capable of withstanding extreme temperatures or drought.

As research into genetic engineering progresses (for example, the development of the CRISPR/Cas9 method in gene editing and therapy), the constraints of effective delivery and specificity will be overcome, leaving us with one immediate and most challenging question, particularly from an ethical viewpoint: How will genetic editing revolutionize medical research and medical treatment? In principle, both plants and animals could potentially be engineered to produce pharmaceuticals and other forms of treatment. The day when cows are engineered to produce in its milk a blood-clotting element, which haemophiliacs lack, is not far off. Researchers have already started to engineer the genomes of pigs with the goal of growing organs suitable for human transplantation (a process called xenotransplantation, which could not be envisaged until now because of the risk of immune rejection by the human body and of disease transmission from animals to humans).

In line with the point made earlier about how different technologies fuse and enrich each other, 3D manufacturing will be combined with gene editing to produce living tissues for the purpose of tissue repair and regeneration – a process called bioprinting. This has already been used to generate skin,

bone, heart and vascular tissue. Eventually, printed liver-cell layers will be used to create transplant organs.

We are developing new ways to embed and employ devices that monitor our activity levels and blood chemistry, and how all of this links to well-being, mental health and productivity at home and at work. We are also learning far more about how the human brain functions and we are seeing exciting developments in the field of neurotechnology. This is underscored by the fact that – over the past few years - two of the most funded research programs in the world are in brain sciences.

It is in the biological domain where I see the greatest challenges for the development of both social norms and appropriate regulation. We are confronted with new questions around what it means to be human, what data and information about our bodies and health can or should be shared with others, and what rights and responsibilities we have when it comes to changing the very genetic code of future generations.

To return to the issue of genetic editing, that it is now far easier to manipulate with precision the human genome within viable embryos means that we are likely to see the advent of designer babies in the future who possess particular traits or who are resistant to a specific disease. Needless to say, discussions about the opportunities and challenges of these capabilities are underway. Notably, in December 2015, the National Academy of Sciences and National Academy of Medicine of the US, the Chinese Academy of Sciences and the Royal Society of the UK convened an International Summit on Human Gene Editing. Despite such deliberations, we are not yet prepared to confront the realities and consequences of the latest genetic techniques even though they are coming. The social, medical, ethical and psychological challenges that they pose are considerable and need to be resolved, or at the very least, properly addressed.

The dynamics of discovery

Innovation is a complex, social process, and not one we should take for granted. Therefore, even though this section has highlighted a wide array of technological advances with the power to change the world, it is important that we pay attention to how we can ensure such advances continue to be made and directed towards the best possible outcomes.

Academic institutions are often regarded as one of the foremost places to pursue forward-thinking ideas. New evidence, however, indicates that the career incentives and funding conditions in universities today favour incremental, conservative research over bold and innovative programmes.¹²

One antidote to research conservatism in academia is to encourage more commercial forms of research. This too, however, has its challenges. In 2015, Uber Technologies Inc. hired 40 researchers and scientists in robotics from Carnegie Mellon University, a significant proportion of the human capital of a lab, impacting its research capabilities and putting stress on the university's contracts with the U.S. Department of Defence and other organizations.¹³

To foster both ground-breaking fundamental research and innovative technical adaptations across academia and business alike, governments should allocate more aggressive funding for ambitious research programmes. Equally, public-private research collaborations should increasingly be structured towards building knowledge and human capital to the benefit of all.

Table 1: Tipping points expected to occur by 2025

	%
10% of people wearing clothes connected to the Internet	91.2
90% of people having unlimited and free (advertising-supported) storage	91.0
1 billion sensors connected to the Internet	89.2
The first robotic pharmacist in the US	88.6
10% of reading glasses connected to the Internet	88.6
80% of people with a digital presence on the Internet	84.4
The first 3D-printed car in production	84.1
The first government to replace its census with big-data sources	82.9
The first implantable mobile phone available commercially	81.7
5% of consumer products printed in 3D	81.1
80% of the population using smartphones	80.7
90% of the population with regular access to the Internet	78.8
Driverless cars equaling 10% of all cars on US roads	78.2
The first transplant of a 3D-printed liver	76.4
90% of corporate audits performed by AI	75.4
Tax collected for the first time by a government via a blockchain	73.1
Over 50% of Internet traffic to homes for appliances and devices	69.9
Globally more trips/journeys via car sharing than in private cars	67.2
The first city with more than 50,000 people and no traffic lights	63.7
10% of global gross domestic products stored on blockchain technology	57.9
The first AI machine on a corporate board of directors	45.2

Source: *Deep Shift—Technology Tipping Points and Societal Impact*, Global Agenda Council on the Future of Software and Society, World Economic Forum, September 2015.

What evidence supports this and what does it tell us about what lies ahead? The early signs point to a wave of labour-substitutive innovation across multiple industries and job categories which will likely happen in the coming decades.

Labour substitution

Many different categories of work, particularly those that involve mechanically repetitive and precise manual labour, have already been automated. Many others will follow, as computing power continues to grow exponentially. Sooner than most anticipate, the work of professions as different as lawyers, financial analysts, doctors, journalists, accountants, insurance underwriters or librarians may be partly or completely automated.

So far, the evidence is this: The fourth industrial revolution seems to be creating fewer jobs in new industries than previous revolutions. According to an estimate from the Oxford Martin Programme on Technology and Employment, only 0.5% of the US workforce is employed in industries that did not exist at the turn of the century, a far lower percentage than the approximately 8% of new jobs created in new industries during the 1980s and the 4.5% of new jobs created during the 1990s. This is corroborated by a recent US Economic Census, which sheds some interesting light on the relationship between technology and unemployment. It shows that innovations in information and other disruptive technologies tend to raise productivity by replacing existing workers, rather than creating new products needing more labour to produce them.

Two researchers from the Oxford Martin School, economist Carl Benedikt Frey and machine learning expert Michael Osborne, have quantified the potential effect of technological innovation on unemployment by ranking 702 different professions according to their probability of being automated, from the least susceptible to the risk of automation ("0" corresponding to no risk at all) to those that are the most susceptible to the risk ("1" corresponding to a certain risk of the job being replaced by a computer of some sort).²³ In Table 2 below, I highlight certain professions that are most likely to be automated, and those least likely.

This research concludes that about 47% of total employment in the US is at risk, perhaps over the next decade or two, characterized by a much broader

is one of the most important, emerging drivers of competitiveness. In a world where talent is the dominant form of strategic advantage, the nature of organizational structures will have to be rethought. Flexible hierarchies, new ways of measuring and rewarding performance, new strategies for attracting and retaining skilled talent will all become key for organizational success. A capacity for agility will be as much about employee motivation and communication as it will be about setting business priorities and managing physical assets.

My sense is that successful organizations will increasingly shift from hierarchical structures to more networked and collaborative models. Motivation will be increasingly intrinsic, driven by the collaborative desire of employees and management for mastery, independence and meaning. This suggests that businesses will become increasingly organized around distributed teams, remote workers and dynamic collectives, with a continuous exchange of data and insights about the things or tasks being worked on.

An emerging workplace scenario that reflects this change builds on the rapid rise of wearable technology when combined with the internet of things, which is progressively enabling companies to blend digital and physical experiences to benefit workers as well as consumers. For example, workers operating with highly complex equipment or in difficult situations can use wearables to help design and repair components. Downloads and updates to connected machinery ensure that both workers in the field and the capital equipment they use are kept up to date with the latest developments. In the world of the fourth industrial revolution, where it is standard practice to upgrade cloud-based software and refresh data assets through the cloud, it will be even more important to ensure that humans and their skills keep pace.

Combining the digital, physical and biological worlds

Companies able to combine multiple dimensions – digital, physical and biological – often succeed in disrupting an entire industry and their related systems of production, distribution and consumption.

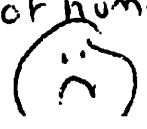
Uber's popularity in many cities starts with an improved customer experience – tracking of the car location via a mobile device, a description

When people are locked at as costing too much or

when sickness makes \$ this is dangerous.

Tracking people for the love

Tracking people for control of \$ not the love of humanity
then 60 not to protect their freedom and free will under



MainStream, the World Economic Forum's initiative to accelerate the transition to the circular economy, has shown, the promise is not just that individuals, organizations and governments can have less impact on the natural world but also that there is great potential to restore and regenerate our natural environment through the use of technologies and intelligent systems design.

At the heart of this promise is the opportunity to shift businesses and consumers away from the linear take-make-dispose model of resource use, which relies on large quantities of easily accessible resources, and towards a new industrial model where effective flows of materials, energy, labour and now information interact with each other and promote by design a restorative, regenerative and more productive economic system.

There are four pathways that help take us there. First, thanks to the internet of things (IoT) and intelligent assets, it is now possible to track materials and energy flows so as to achieve huge new efficiencies all the way along value chains. Of the \$14.4 trillion in economic benefits that Cisco estimates will be realized from the IoT in the next decade, \$2.7 trillion in value can be gained from elimination of waste and improved processes in supply chains and logistics. IoT-enabled solutions could reduce greenhouse gas emissions by 9.1 billion tonnes by 2020, representing 16.5% of the projected total in that year.⁴⁰

Second, the democratization of information and transparency that comes from digitized assets gives new powers to citizens to hold companies and countries accountable. Technologies such as blockchain will help make this information more trustworthy, for example by capturing and certifying satellite monitoring data on deforestation in a secure format to hold landholders to account more closely.

Third, new information flows and increasing transparency can help shift citizen behaviour on a large scale, as it becomes the path of least resistance within a new set of business and social norms for a sustainable circular system. Fruitful convergence between the fields of economics and psychology has been producing insights into how we perceive the world, behave and justify our behaviour, while a number of large-scale randomized control trials by governments, corporations and universities have shown that this can work. One example is OPower, which uses peer-comparison to

Controlling people by teaching people the mark of the beast is fear of thought controlled, conditional freedom. Not encouraging freedom.

incentives temptations like devils of lighting the burden of the backs of people

entice people into consuming less electricity, thereby protecting the environment while reducing costs.

*Unjust Decisions
Just Decisions*



Fourth, as the previous section detailed, new business and organizational models promise innovative ways of creating and sharing value, which in turn lead to whole system changes that can actively benefit the natural world as much as our economies and societies. Self-driving vehicles, the sharing economy and leasing models all result in significantly higher asset utilization rates, as well as making it far easier to capture, reuse and “upcycle” materials when the appropriate time comes.

The fourth industrial revolution will enable firms to extend the use-cycle of assets and resources, increase their utilization and create cascades that recover and repurpose materials and energy for further uses, lowering emissions and resource loads in the process. In this revolutionary new industrial system, carbon dioxide turns from a greenhouse pollutant into an asset, and the economics of carbon capture and storage move from being cost as well as pollution sinks to becoming profitable carbon-capture and use-production facilities. Even more importantly, it will help companies, governments and citizens become more aware of and engaged with strategies to actively regenerate natural capital, allowing intelligent and regenerative uses of natural capital to guide sustainable production and consumption and give space for biodiversity to recover in threatened areas.

Autonomous warfare, including the deployment of military robots and AI-powered automated weaponry, creates the prospect of “robo-war”, which will play a transformative role in future conflict.

The seabed and space are also likely to become increasingly militarized, as more and more actors – state and commercial – gain the ability to send up satellites and mobilize unmanned underwater vehicles capable of disrupting fibre-optic cables and satellite traffic. Criminal gangs are already using off-the-shelf quadcopter drones to spy on and attack rivals. Autonomous weapons, capable of identifying targets and deciding to open fire without human intervention, will become increasingly feasible, challenging the laws of war.

Box F: Emerging Technologies Transforming International Security

Drones: They are essentially flying robots. The US currently leads but the technology is spreading widely and becoming more affordable.

Autonomous weapons: Combining drone technology with artificial intelligence, they have the potential to select and engage targets without human intervention, according to pre-defined criteria.

Militarization of space: While more than half of all satellites are commercial, these orbiting communications devices are increasingly important for military purposes. A new generation of hypersonic “glide” weapons are also poised to enter this domain, increasing the probability that space will play a role in future conflicts and raising concern that current mechanisms to regulate space activities are no longer sufficient.

Wearable devices: They can optimize health and performance under conditions of extreme stress or produce exoskeletons that enhance soldiers’ performance, allowing a human to carry loads of around 90 kg without difficulty.

Additive manufacturing: It will revolutionize supply chains by enabling replacement parts to be manufactured in the field from digitally transmitted designs and locally available materials. It could also enable the development of new kinds of warheads, with greater control of particle size

Those who back it will hold the power

3 killing w/o a purpose
Not to help humanity but use fear to drive prof
This is awful planned back in 2015



and detonation.

Renewable energy: This enables power to be generated locally, revolutionizing supply chains and enhancing the capacity to print parts on demand in even remote locations.

Nanotechnology: Nano is progressively leading to metamaterials, smart materials which possess properties that do not occur naturally. It will make weaponry better, lighter, more mobile, smarter and more precise, and will ultimately result in systems that can self-replicate and assemble.

Biological weapons: The history of biological warfare is nearly as old as the history of warfare itself, but rapid advances in biotechnology, genetics and genomics are the harbinger of new highly lethal weapons. Airborne designer viruses, engineered superbugs, genetically modified plagues and so on: all these form the basis of potential doomsday scenarios.

Biochemical weapons: As with biological weapons, technological innovation is making the assembly of these weapons almost as easy as a do-it-yourself task. Drones could be employed to deliver them.

Social Media: While digital channels provide opportunities for spreading information and organizing action for good causes, they can also be used to spread malicious content and propaganda and, as with ISIS, employed by extremist groups to recruit and mobilize followers. Young adults are particularly vulnerable, especially if they lack a stable social support network.

When I ran for office I had plans to improve healthcare. The Dems had plans to protect that. BAD case, by creating more Hospitals w/ more NIH

test dummies of treating patients as lab rats not precious people capable of reflecting the image of God



They talked about designer viruses for protection 2013. Not to love humanity



Many of the technologies described in Box F: Emerging Technologies Transforming International Security already exist. As an example, Samsung's SGR-A1 robots, equipped with two machine guns and a gun with rubber bullets, now man border posts in the Korean Demilitarized Zone. They are, for the moment, controlled by human operators but could, once programmed, identify and engage human targets independently.

Last year, the UK Ministry of Defence and BAE Systems announced the successful test of the Taranis stealth plane, known also as Raptor, which can take off, fly to a given destination and find a set target with little intervention from its operator unless required. There are many such examples.⁵⁰ They will multiply, and in the process, raise critical questions at the intersection of geopolitics, military strategy and tactics, regulation and

They had plans for designer viruses back in 2013 and probably years before then but design



ethics.

Using Medical for military Not freedom but selling souls for money

New frontiers in global security

As stressed several times in this book, we only have a limited sense of the ultimate potential of new technologies and what lies ahead. This is no less the case in the realm of international and domestic security. For each innovation we can think of, there will be a positive application and a possible dark side. While neurotechnologies such as neuroprosthetics are already employed to solve medical problems, in future they could be applied to military purposes. Computer systems attached to brain tissue could enable a paralysed patient to control a robotic arm or leg. The same technology could be used to direct a bionic pilot or soldier. Brain devices designed to treat the conditions of Alzheimer's disease could be implanted in soldiers to erase memories or create new ones. "It's not a question of if non-state actors will use some form of neuroscientific techniques or technologies, but when, and which ones they'll use," reckons James Giordano, a neuroethicist at Georgetown University Medical Center, "The brain is the next battlespace."⁵¹



Controlling brains of soldiers



The availability and, at times, the unregulated nature of many of these innovations have a further important implication. Current trends suggest a rapid and massive democratization of the capacity to inflict damage on a very large scale, something previously limited to governments and very sophisticated organizations. From 3D-printed weapons to genetic engineering in home laboratories, destructive tools across a range of emerging technologies are becoming more readily available. And with the fusion of technologies, a key theme of this book, unpredictable dynamics inherently surface, challenging existing legal and ethical frameworks.

already created



Towards a more secure world

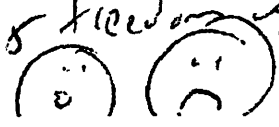
No elimination of freedom under basic order and aid

In the face of these challenges, how do we persuade people to take the security threats from emerging technologies seriously? Even more importantly, can we engender cooperation between the public and private sectors on the global scale to mitigate these threats?



Over the second half of the last century, the fear of nuclear warfare gradually gave way to the relative stability of mutually assured destruction

taking away freedom of control of their own bodies



3.5.1 Identity, Morality and Ethics

The mind-boggling innovations triggered by the fourth industrial revolution, from biotechnology to AI, are redefining what it means to be human. They are pushing the current thresholds of lifespan, health, cognition and capabilities in ways that were previously the preserve of science fiction. As knowledge and discoveries in these fields progress, our focus and commitment to having ongoing moral and ethical discussions is critical. As human beings and as social animals, we will have to think individually and collectively about how we respond to issues such as life extension, designer babies, memory extraction and many more.

At the same time, we must also realize that these incredible discoveries could also be manipulated to serve special interests – and not necessarily those of the public at large. As theoretical physicist and author Stephen Hawking and fellow scientists Stuart Russell, Max Tegmark and Frank Wilczek wrote in the newspaper *The Independent* when considering the implications of artificial intelligence: “Whereas the short-term impact of AI depends on who controls it, the long-term impact depends on whether it can be controlled at all...All of us should ask ourselves what we can do now to improve the chances of reaping the benefits and avoiding the risks”.⁶⁰

One interesting development in this area is OpenAI, a non-profit AI research company announced in December 2015 with the goal to “advance digital intelligence in the way that is most likely to benefit humanity as a whole, unconstrained by a need to generate financial return”.⁶¹ The initiative – chaired by Sam Altman, President of Y Combinator, and Elon Musk, CEO of Tesla Motors - has secured \$1 billion in committed funding. This initiative underscores a key point made earlier – namely, that one of the biggest impacts of the fourth industrial revolution is the empowering potential catalyzed by a fusion of new technologies. Here, as Sam Altman stated, “the best way AI can develop is if it’s about individual empowerment and making humans better, and made freely available to everyone.”⁶²

The human impact of some particular technologies such as the internet or smart phones is relatively well understood and widely debated among experts and academics. ~~Other impacts are so much harder to grasp.~~ Such is the case with AI or synthetic biology. We may see designer babies in the near future, along with a whole series of other edits to our humanity – from

Making themselves their own God
Every human is different
and special and
unique.



2025 back published 2015

Shift 1: Implantable Technologies

The tipping point: The first implantable mobile phone available commercially

By 2025: 82% of respondents expected this tipping point will have occurred

People are becoming more and more connected to devices, and those devices are increasingly becoming connected to their bodies. Devices are not just being worn, but also being implanted into bodies, serving communications, location and behaviour monitoring, and health functions.

Pacemakers and cochlear implants were just the beginning of this, with many more health devices constantly being launched. These devices will be able to sense the parameters of diseases; they will enable individuals to take action, send data to monitoring centres, or potentially release healing medicines automatically.

Smart tattoos and other unique chips could help with identification and location. Implanted devices will likely also help to communicate thoughts normally expressed verbally through a “built-in” smart phone, and potentially unexpressed thoughts or moods by reading brainwaves and other signals.

Positive impacts

- Reduction in missing children
- Increased positive health outcomes
- Increased self-sufficiency
- Better decision-making
- Image recognition and availability of personal data (anonymous network that will “yelp”⁷⁷ people)

Negative impacts

- Privacy/potential surveillance
- Decreased data security
- Escapism and addiction
- Increased distractions (i.e. attention deficit disorder)

Unknown, or cuts both ways

- Longer lives
- Changing nature of human relationships
- Changes in human interactions and relationships
- Real-time identification
- Cultural shift (eternal memory)

The shift in action

- Digital tattoos not only look cool but can perform useful tasks, like unlocking a car, entering mobile phone codes with a finger-point or tracking body processes.

Source: <https://wtvox.com/3d-printing-in-wearable-tech/top-10-implantable-wearables-soon-body/>

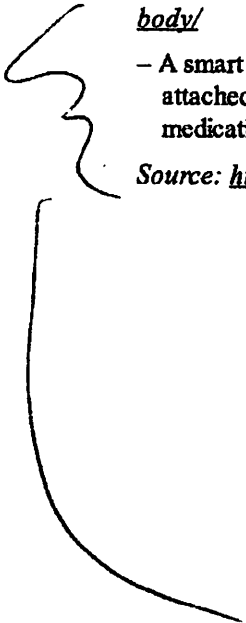
- According to a WT VOX article: “Smart Dust, arrays of full computers with antennas, each much smaller than a grain of sand, can now organize themselves inside the body into as-needed networks

to power a whole range of complex internal processes. Imagine swarms of these attacking early cancer, bringing pain relief to a wound or even storing critical personal information in a manner that is deeply encrypted and hard to hack. With smart dust, doctors will be able to act inside your body without opening you up, and information could be stored inside you, deeply encrypted, until you unlock it from your very personal nano network."

Source: <https://wtvox.com/3d-printing-in-wearable-tech/top-10-implantable-wearables-soon-body/>

- A smart pill, developed by Proteus Biomedical and Novartis, has a biodegradable digital device attached to it, which transmits data to your phone on how the body is interacting with the medication.

Source: <http://cen.acs.org/articles/90/i7/Odd-Couplings.html>



A smart pill that transmits & sells your health data was already created in 2015 creepy.

My body is God's, not to sell for healthcare. World meter shows the #1 & #2 is healthcare stake is under the guise of education.



The Metaverse talks about these AR/VR development

Shift 3: Vision as the New Interface

The tipping point: 10% of reading glasses connected to the internet

By 2025: 86% of respondents expected this tipping point will have occurred

Google Glass is just the first of many potential ways in which glasses, eyewear/headsets and eye-tracking devices can become “intelligent” and lead to eyes and vision being the connection to the internet and connected devices.

With direct access to internet applications and data through vision, an individual’s experiences can be enhanced, mediated or completely augmented to provide different, immersive reality. Also, with emerging eye-tracking technologies, devices can feed information through visual interfaces, and eyes can be the source for interacting with and responding to the information.

Enabling vision as an immediate, direct interface – by providing instruction, visualization and interaction – can change the way that learning, navigation, instruction and feedback for producing goods and services, experiencing entertainment and enabling the disabled are helping people to engage more fully with the world.

Positive impacts

- Immediate information to the individual to make informed decisions for navigation and work/personal activities
- Improved capacity to perform tasks or produce goods and services with visual aids for manufacturing, healthcare/surgery and service delivery
- Ability for those with disabilities to manage their interactions and movement, and to experience the world – through speaking, typing and moving, and via immersive experiences

Negative impacts

- Mental distraction causing accidents
- Trauma from negative immersive experiences
- Increased addiction and escapism

Unknown, or cuts both ways

- A new segment created in the entertainment industry
- Increased immediate information

The shift in action

Glasses are already on the market today (not just produced by Google) that can:

- Allow you to freely manipulate a 3D object, enabling it to be moulded like clay
- Provide all the extended live information you need when you see something, in the same way the brain functions
- Prompt you with an overlay menu of the restaurant you pass by
- Project picture or video on any piece of paper

Source: <http://www.hongkiat.com/blog/augmented-reality-smart-glasses/>

Facebook launch of this

Planned hackers for profit
seen to be included w/ their
design to serve speed
not speed control

Shift 12: Driverless Cars



The tipping point: Driverless cars equalling 10% of all cars on US roads

By 2025: 79% of respondents expected this tipping point to have occurred

Trials of driverless cars from large companies such as Audi and Google are already taking place, with a number of other enterprises ramping up efforts to develop new solutions. These vehicles can potentially be more efficient and safer than cars with people behind the steering wheel. Moreover, they could reduce congestion and emissions, and upend existing models of transportation and logistics.

Positive impacts

- Improved safety
- More time for focusing on work and/or consuming media content
- Effect on the environment
- Less stress and road rage
- Improved mobility for those older and disabled, among others
- Adoption of electric vehicles

Negative impacts

- Job losses (taxi and truck drivers, car industry)
- Upending of insurance and roadside assistance ("pay more to drive yourself")
- Decreased revenue from traffic infringements
- Less car ownership
- Legal structures for driving
- Lobbying against automation (people not allowed to drive on freeways)
- Hacking/cyber attacks

The shift in action

In October 2015, Tesla made its cars that were sold over the last year in the US semi-autonomous via a software update.

Source: <http://www.wired.com/2015/10/tesla-self-driving-over-air-update-live>

Google plans to make autonomous cars available to the public in 2020.

Source: Thomas Halleck, 14 January 2015, "Google Inc. Says Self-Driving Car Will Be Ready By 2020", *International Business Times*: <http://www.ibtimes.com/google-inc-says-self-driving-car-will-be-ready-2020-1784150>

In the summer of 2015, two hackers demonstrated their ability to hack into a moving car, controlling its dashboard functions, steering, brakes etc., all through the vehicle's entertainment system.

Source: <http://www.wired.com/2015/07/hackers-remotely-kill-jeep-highway/>

The first state in the United States (Nevada) to pass a law allowing driverless (autonomous) cars did so in 2012.

Source: Alex Knapp, 22 June 2011, "Nevada Passes Law Authorizing Driverless Cars", *Forbes*: <http://www.forbes.com/sites/alexknapp/2011/06/22/nevada-passes-law-authorizing-driverless>

Eliminating people
cap-ble of ~~complex~~ ~~and~~
could to love humanity
is a bad idea

Shift 15: Robotics and Services

The tipping point: The first robotic pharmacist in the US

By 2025: 86% of respondents expected this tipping point to have occurred

Robotics is beginning to influence many jobs, from manufacturing to agriculture, and retail to services. According to the International Federation of Robotics, the world now includes 1.1 million working robots, and machines account for 80% of the work in manufacturing a car.⁹³ Robots are streamlining supply chains to deliver more efficient and predictable business results.

Positive impacts

- Supply chain and logistics, eliminations
- More leisure time
- Improved health outcomes (big data for pharmaceutical gains in research and development)
- Banking ATM as early adopter
- More access to materials
- Production "re-shoring" (i.e. replacing overseas workers with robots)

Negative impacts

- Job losses
- Liability, accountability
- Day-to-day social norms, end of 9-to-5 and 24-hour services
- Hacking and cyber-risk

The shift in action

An article from The Fiscal Times appearing on [CNBC.com](http://www.cnbc.com) states that:

"Rethink Robotics released Baxter [in the fall of 2012] and received an overwhelming response from the manufacturing industry, selling out of their production capacity through April ...

[In April] Rethink launch[ed] a software platform that [allows] Baxter to do a more complex sequencing of tasks – for example, picking up a part, holding it in front of an inspection station and receiving a signal to place it in a 'good' or 'not good' pile. The company also [released] a software development kit ... that will allow third parties – like university robotics researchers – to create applications for Baxter."

In "The Robot Reality: Service Jobs Are Next to Go", Blaire Briody, 26 March 2013, The Fiscal Times, <http://www.cnbc.com/id/100592545>

Shift 16: Bitcoin and the Blockchain

The tipping point: 10% of global gross domestic product (GDP) stored on blockchain technology

By 2025: 58% of respondents expected this tipping point to have occurred

Bitcoin and digital currencies are based on the idea of a distributed trust mechanism called the "blockchain", a way of keeping track of trusted transactions in a distributed fashion. Currently, the total worth of bitcoin in the blockchain is around \$20 billion, or about 0.025% of global GDP of around \$80 trillion.

Positive impacts

- Increased financial inclusion in emerging markets, as financial services on the blockchain gain critical mass
- Disintermediation of financial institutions, as new services and value exchanges are created directly on the blockchain
- An explosion in tradable assets, as all kinds of value exchange can be hosted on the blockchain
- Better property records in emerging markets, and the ability to make everything a tradable asset
- Contracts and legal services increasingly tied to code linked to the blockchain, to be used as unbreakable escrow or programmatically designed smart contracts
- Increased transparency, as the blockchain is essentially a global ledger storing all transactions

The shift in action

Smartcontracts.com provides programmable contracts that do payouts between two parties once certain criteria have been met, without involving a middleman. These contracts are secured in the blockchain as "self-executing contractual states", which eliminate the risk of relying on others to follow through on their commitments.

*This will use \$ to control.
people
The U.S. must control \$, not
be controlled by the love of
money through the entity
if delegates the control of
\$ to.*

This not sharing ^{and creating}
but a feudalism system eliminating
private property of the common man
to create a feudal system

Shift 17: The Sharing Economy

The tipping point: Globally more trips/journeys via car sharing than in private cars

By 2025: 67% of respondents expected this tipping point to have occurred

The common understanding of this phenomenon is the usually technology-enabled ability for entities (individuals or organizations) to share the use of a physical good/asset, or share/provide a service, at a level that was not nearly as efficient or perhaps even possible before. This sharing of goods or services is commonly possible through online marketplaces, mobile apps/location services or other technology-enabled platforms. These have reduced the transaction costs and friction in the system to a point where it is an economic gain for all involved, divided in much finer increments.

Well-known examples of the sharing economy exist in the transportation sector. Zipcar provides one method for people to share use of a vehicle for shorter periods of time and more reasonably than traditional rental car companies. RelayRides provides a platform to locate and borrow someone's personal vehicle for a period of time. Uber and Lyft provide much more efficient "taxi-like" services from individuals, but aggregated through a service, enabled by location services and accessed through mobile apps. In addition, they are available at a moment's notice.

The sharing economy has any number of ingredients, characteristics or descriptors: technology enabled, preference for access over ownership, peer to peer, sharing of personal assets (versus corporate assets), ease of access, increased social interaction, collaborative consumption and openly shared user feedback (resulting in increased trust). Not all are present in every "sharing economy" transaction.

Positive impacts

- Increased access to tools and other useful physical resources
- Better environmental outcomes (less production and fewer assets required)
- More personal services available
- Increased ability to live off cash flow (with less need for savings to be able to afford use of assets)
- Better asset utilization
- Less opportunity for long-term abuse of trust because of direct and public feedback loops
- Creation of secondary economies (Uber drivers delivering goods or food)


Negative impacts

- Less resilience after a job loss (because of less savings)
- More contract / task-based labour (versus typically more stable long-term employment)
- Decreased ability to measure this potentially grey economy
- More opportunity for short-term abuse of trust
- Less investment capital available in the system

No savings No small
business
will exist
under their
plan

Unknown, or cuts both ways

- Changed property and asset ownership
- More subscription models
- Less savings
- Lack of clarity on what "wealth" and "well off" mean

Horrible slavery
under guise of
sharing forced
labor 13th century


Shift 20: 3D Printing and Human Health

The tipping point: The first transplant of a 3D-printed liver

By 2025: 76% of respondents expected this tipping point to have occurred

One day, 3D printers may create not only things, but also human organs – a process called bioprinting. In much the same process as for printed objects, an organ is printed layer by layer from a digital 3D model.⁹⁷ The material used to print an organ would obviously be different from what is used to print a bike, and experimenting can be done with the kinds of materials that will work, such as titanium powder for making bones. 3D printing has great potential to service custom design needs; and, there is nothing more custom than a human body.

Positive impacts

- Addressing the shortage of donated organs (an average of 21 people die each day waiting for transplants that can't take place because of the lack of an organ)⁹⁸
- Prosthetic printing: limb/body part replacements
- Hospitals printing for each patient requiring surgery (e.g. splints, casts, implants, screws)
- Personalized medicine: 3D printing growing fastest where each customer needs a slightly different version of a body part (e.g. a crown for a tooth)
- Printing components of medical equipment that are difficult or expensive to source, such as transducers⁹⁹
- Printing, for example, dental implants, pacemakers and pens for bone fracture at local hospitals instead of importing them, to reduce the cost of operations
- Fundamental changes in drug testing, which can be done on real human objects given the availability of fully printed organs
- Printing of food, thus improving food security

Negative impacts

- Uncontrolled or unregulated production of body parts, medical equipment or food
- Growth in waste for disposal, and further burden on the environment
- Major ethical debates stemming from the printing of body parts and bodies: Who will control the ability to produce them? Who will ensure the quality of the resulting organs?
- Perverted disincentives for health: If everything can be replaced, why live in a healthy way?
- Impact on agriculture from printing food

The shift in action

The first use of a 3D-printed spine implant was reported by Popular Science:

“[In 2014], doctors at Peking University Third Hospital successfully implanted the first ever 3-D-printed section of vertebra into [a] young patient to replace a cancerous vertebra in his neck. The replacement vertebra was modelled from the boy's existing vertebra, which made it easier for them to integrate.

Source: “Boy Given a 3-D Printed Spine Implant, Loren Grush, Popular Science, 26 August 2014, <http://www.popsci.com/article/science/boy-given-3-d-printed-spine-implant>

Shift 22: Designer Beings ¹⁰³

The tipping point: The first human whose genome was directly and deliberately edited is born

Since the turn of the century, the cost of sequencing an entire human genome has fallen by almost six orders of magnitude. The human genome project spent \$2.7 billion to produce the first entire genome in 2003. By 2009 the cost per genome was down to 100k while today it is possible for researchers to pay a lab specialising in such matters only \$1000 to sequence a human genome. A similar trend has occurred more recently in genome editing with the development of the CRISPR/Cas9 method, which is being widely adopted due to its higher effectiveness and efficiency and lower cost than previous approaches.

The real revolution is hence not the sudden ability for dedicated scientists to edit the genes of plants and animals, but rather the increased ease that new sequencing and editing technologies provide, vastly increasing the number of researchers who are able to conduct experiments

Positive impacts

- Higher agricultural yields thanks to crops and crop treatments which are more robust, effective and productive
- More effective medical therapies via personalised medicine
- Faster, more accurate, less invasive medical diagnostics
- Higher levels of understanding of human impact on nature
- Reduced incidence of genetic disease and related suffering

Negative impacts

- Risk of interaction between edited plants/animals human/environmental health
- Exacerbated inequality due to high cost of access to therapies
- Social backlash or rejection of gene editing technologies
- Misuse of genetic data by governments or companies
- International disagreements about ethical use of genome editing technologies

Unknown or cuts both ways

- Increased longevity
- Ethical dilemmas regarding nature of humanity
- Cultural shifts

The shift in action

“In March 2015, leading scientists publish a Nature article calling for a moratorium on editing human embryos, highlighting “grave concerns regarding the ethical and safety implications of this research”. Only one month later, in April 2015, “Researchers led by Junju Huang of Yat-sen University in Guangzhou published the world’s first scientific paper on altering the DNA of human embryos.”

Sources: <http://www.nature.com/news/don-t-edit-the-human-germ-line-1.17111>;
<http://qz.com/389494/chinese-researchers-are-the-first-to-genetically-modify-a-human-embryo-and-many-scientists-think-theyve-gone-too-far/>

Shift 23: Neurotechnologies ¹⁰⁴

The tipping point: The first human with fully artificial memory implanted in the brain

There is not one area of our personal and professional lives that cannot benefit from a better understanding of how our brain functions – at both the individual and collective levels. This is underscored by the fact that – over the past few years - two of the most funded research programs in the world are in brain sciences: The *Human Brain Project* (a €1 billion project over 10 years funded by the European Commission) and President Obama’s *Brain Research Through Advancing Innovative Neurotechnologies* (BRAIN) Initiative. Although these programs are primarily focused on scientific and medical research, we are also witnessing the rapid growth (and influence) of neurotechnologies in non-medical aspects of our lives. Neurotechnology consists of monitoring brain activity and looking at how the brain changes and/or interfaces with the world.

In 2015, for example, the portability and the affordability of neuro-headsets (which already cost less than a gaming console) offer unprecedented possibilities - marking what is likely to be not only a neuro-revolution, but also a societal one¹⁰⁵.

Positive impacts

- Disabled people can now control prosthetic limbs or wheel-chairs “with their minds”.
- Neurofeedback, the possibility to monitor brain activity in real time, offers countless possibilities to help fight addictions, regulate food behaviour, and improve performances ranging from sports to the classroom.
- Being able to collect, process, store and compare large amounts of brain activity-related data allows us to improve diagnosis and treatment efficiency of brain disorders and mental health-related issues.
- The law will be able to provide customized processing on cases and address responsibility issues in criminal cases in a differential fashion rather than in a generic one now.
- The next generation of computers, whose design has been informed by brain science, may reason, predict and react just like the human cortex (an area of the brain known as the seat of intelligence).

Negative impacts

- Brain-based discrimination: Individuals are not just their brains, as such there is a risk for decisions to be made in a context-independent fashion, based only on brain data in fields ranging from the law to HR, consumer behaviour or education¹⁰⁶.
- Fear of what thoughts/dreams/desires to be decrypted and for privacy to no longer exist,
- Fear of creativity or the human touch to slowly but surely disappear, mainly carried so far by overselling what brain sciences can do.
- Blurring the lines between man and machine

Unknown, or cuts both ways

- Cultural shift
- Disembodiment of communication
- Improvement of performance
- Extending human cognitive abilities will trigger new behaviours

The shift in action

- Cortical computing algorithms have already shown an ability to solve modern CAPTCHAs (widely used tests to distinguish humans from machines).
- The automotive industry has developed systems monitoring attention and awareness that can stop cars when people are falling asleep while driving.
- An intelligent computer program in China scored better than many human adults on an IQ test.
- IBM's Watson supercomputer, after sifting through millions of medical records and databases, has begun to help doctors choose treatment options for patients with complex needs.
- Neuromorphic image sensors, i.e. inspired how the eye and brain communicate, will have impact ranging from battery usage to robotics
- Neuroprosthetics are allowing disabled people to control artificial members and exoskeletons. Some blind people will be able to see (again).
- The Restoring Active Memory (RAM) program by DARPA is a precursor to memory restoration and enhancement
- Depression symptoms in mice could be cured by the artificial reactivation of happy memories as evidenced by Neuroscientists at MIT

Doraiswamy M. (2015). 5 brain technologies that will shape our future. World Economic Forum Agenda, Aug 9

<https://agenda.weforum.org/2015/08/5-brain-technologies-future/>

Fernandez A (2015). 10 neurotechnologies about to transform brain enhancement and brain health.

SharpBrains, USA, Nov 10

<http://sharpbrains.com/blog/2015/11/10/10-neurotechnologies-about-to-transform-brain-enhancement-and-brain-health/>

EXHIBIT 6

Law library/21-1490

From: Meg Kelly (meghankellyesq@yahoo.com)

To: ryan.costa@delaware.gov; zi-xiang.shen@delaware.gov; david.weiss@usdoj.gov

Bcc: meghankellyesq@yahoo.com

Date: Wednesday, December 15, 2021, 04:49 PM EST

Good afternoon,

I hope you are safe and well.

I am concerned. The law librarian has access to PACER, allegedly for the DE Supreme Court. She said the Supreme Court gave them their password. When I called PACER from the law library concerning fees, the representative indicated the DE Courts do not use pacer and should not require pacer. Only the federal courts use it. Then, the law librarian started making up reasons why the DE Supreme Court paid for pacer. I think they intend to sue me in retaliation of the exercise of my First Amendment rights. I mentioned that on my exhibits, admissible as a presence sense impression should anything happen to me.

I think the DE Supreme Court seeks to take me out by demeaning my reputation.

I do not believe the same as others. I should not be punished for having different religious beliefs. Jesus teaches people go to hell if they allow their desires for security in money to control their life. I do not serve money. I choose God as master.

Do you see how our leaders are misled by money, by money they allowed the federal reserve and private entities to control by creating out of nothingness, and how the government sins by controlling people by money, penalties and profit, instead of safeguarding their freedom with just decrees? If you could persuade the Courts this is a violation of the 13th, you may prevent the planned crash. The government must govern, not be governed by money. The Government must take control of money to care for the people, and safeguard freedom.

I was tearing up when I wrote this without sending it. I am allowed to think differently, as an individual, and believe differently. Collectively, we are weaker by conformed conditionally thinking. Individually we are stronger together by offering diverse views to improve or adapt to situations. We must protect the freedom of the individual. Otherwise, none are free but forced to conform to the beliefs and thinking of whoever controls the conformed, conditioned group believing, making their will be done like Satan. Instead of laying down our will, our wants, and desires to care to think, care to know, care to love others and to even love ourselves.

Regardless as to what happens to me, there is a plan to crash the economy, to overthrow our government's power to govern, taken over by private partners. I need to help you understand. So maybe you can be the hero, no matter what happens to me. I thought about seeking a mistrial in my case against Trump/Biden, but I feel like crawling up into a ball just thinking about it. If that is the case, David Weiss you will be opposing counsel.

There is a plan to increase desperate conditions, to force folks out of their homes, for the government to take their real property, only for the property to be taken from the government to be controlled by the government's creditors. 47 percent of Americans are scheduled to be unemployed by 2026-27 to work as slaves, unpaid for government welfare in violation of the 13th amendment before more are slaves to a fiefdom system, not communism or capitalism, something much worse. See Attached from the book I previously sent you written in 2015. The book also talked about bio war viruses. When they talk about it, that means they plan on unleashing it. Gates is a partner in the world economic forum. You are Attorney Generals. You have the power and position to reverse or prevent an economic crash.

You must protect those you correct, even if you correct by guiding the President, courts and congress. You are the advocates who are charged to guide those misled by lawless vanities.

You may be my opponents in name only, as I hope you will be heroes to save not only the US, but the world.

It is pretty scary the DE Supreme Court got pacer to go after a peon like me. I do not feel safe. The democrats wanted to eliminate me per my exhibit to the complaint (Complaint against Democrats to run for office without violating my

religious beliefs) prior to the pandemic because I was not on board with their massive bad healthcare plan. It is so strange. I noticed misbehaving companies donated to both sides when I ran for office. Artesian gave to my former opponent Ron Gray and the Democrats in upper DE. It is the same on the federal level. Our leaders are dumb and blind, blinded by money and support. They do not see clearly or hear the sirens of danger ahead.

Did you see the UN's proposals? Clean energy done dirty is still dirty. They propose unjust laws, making the common man pay more so the common man uses less, creating less pollution at the cost of potential suffering and loss of liberty, making everything for sale, even the air we breathe. We will no longer be free to merely be alive.

The proposals of alleged clean deteriorating products cause pollution in the production of replaced products, and unnecessary expenses for the consumer, debt to control the consumers forced to buy replacement products, as opposed to made to last, made to work products.

I support cleaning and safeguarding the environment through just decrees I proposed long ago that lifts the burden off the back of the common man, not increasing the it like Biden and the UN's proposes do.


Notice, per the attached article, Janet Yellen wants to decrease help, as she increases interest rates which will increase folks' need for help. Janet Yellen is not our friend. She has a conflict of interest with the American people, and the interest of the US as former Chair of the Federal Reserve. She has also spoken at the BIS, Bank of International Settlements. Her former colleagues make more money the more debt, the worse off America and Americans and the world is.

Thank you for caring to read my thoughts. The plans are happening quicker than the book outlines. I was not expecting 47 percent of the population to be unemployed by design until 2026-2027, but it may happen sooner. Remember those who make money out of nothingness, the central banks, the BIS, the World Bank, even small banks gain control over people by the debt, not just profit. Poor China, indebted to the World Bank. We are not poor, though we are indebted to the World Bank and China, along with other entities. We can take back the coining power and coin out of nothingness without borrowing or paying interest like Presidents Lincoln and Kennedy proposed to fully pay back all of our debt. We could require banks lend out from their own reserves, to gamble with their own money, unbacked by the US. This will prevent inflation since they will be more careful. No longer will the tax payer fund bad business. The Fed should coin money to pay for their workers too, ensuring pensions will be honored. I have ideas to create a deflation too. So folks' dollars will go farther, but there is no hope of that if the World economic forum and their cohorts, including all of our Presidents, even former President Trump's daughter attended these. They all have dirty hands in need of court correction, not condemnation, to potentially save them too, by being made clean. The World Economic Founder outlines a lot of ways on eliminating freedom and controlling people in the 2015 book, even our clothes. Keep your old clothes. They want to make new clothes with sensors to control people, not to help them, under the guise of helping them.

The entire world is in danger. I hope you choose to be the heroes we need.

Love and thanks,
Meg

 2015 book concerns 4th industrial rev.pdf
552.7kB

 Art increase rates while decrease help spells disaster.pdf
192.1kB

EXHIBIT

3

Sent from my iPhone

Begin forwarded message:

From: "Balke Jeannie (Courts)" <jeannie.Balke@state.de.us>
Date: February 22, 2012 at 11:59:29 AM EST
To: Meg Kelly <meghankellyesq@yahoo.com>
Subject: RE: Sponsor for the United States Supreme Court

I called to check on the spelling of your name on the wall of the Supreme Court -- I was told it has been corrected. Have a nice day!

-----Original Message-----

From: Meg Kelly [<mailto:meghankellyesq@yahoo.com>]
Sent: Tuesday, February 21, 2012 3:10 PM
To: Balke Jeannie (Courts)
Subject: RE: Sponsor for the United States Supreme Court

Dear Ms. Balke,

Thank you so much for checking with Justice Ridgely. Additionally, thank you for your suggestions.

I appreciate your time and help.

On a separate matter, I had the pleasure of being admitted to the DE bar by the Honorable Henry DuPont Ridgely. Unfortunately, I was concerned that my request to be admitted by affirmation as opposed to being sworn in was not honored. I made a special request with Ms. Holland, and yet it was not honored.

I know it sounds silly but I am a Christian and I actually believe in the bible. So, I've felt guilty years later because the bible provides, "Above all, my brothers, do not swear-- not by heaven or by earth or by anything else. Let your 'Yes' be yes, and your 'No' be no, or you will be condemned." NIV James 5:12.

The bible further provides, "Do not swear at all: either by heaven, for it is God's throne; or by the earth, for it is his footstool: or by Jerusalem ... Simply let your 'Yes' be 'Yes,' and your 'No,' be 'No' anything beyond that comes from the evil one." NIV Matthew 5:34-37.

To make matters worse, my name was misspelled on the wall of the Supreme Court. I know there's nothing I can do about how I became licensed in DE, but I was hoping I could somehow fix my name on the wall of the Supreme Court.

I have a family full of successful attorneys, and I am but a peon, still starting out. I can't believe I am related to the Mark Braden who coined the term "soft money." And my cousin Ikey Adams works where the President met his wife, Sidley Austin, and my deceased Grandpop has a plaque at Pittsburgh Courthouse as the infamous public defender "Battle Ship Bob." Nonetheless, I am proud to be the first female attorney in my family, and it would mean the world to be to correct the spelling of my name. So, I could someday show my future children and grandchildren that they can do anything if they stay determined. I brought it up with Ms. Holland a couple of times, but to the best

of my knowledge it has not been corrected.

Thanks again for asking Justice Ridgely for help. I appreciate your kindness.

Very truly,
Meg Kelly, Esq.

ps. It's silly that we swear on the bible, when the bible instructs us not to swear. Could you ask the judges whether they would consider swearing in witnesses and admittees by using the term "do you swear or affirm." That way it may prevent heartbreak and regret. Thank you.

— On Mon, 2/20/12, Balke Jeannie (Courts) <Jeannie.Balke@state.de.us> wrote:

From: Balke Jeannie (Courts) <Jeannie.Balke@state.de.us>
Subject: RE: Sponsor for the United States Supreme Court
To: "Meg Kelly" <meghankellyesq@yahoo.com>
Date: Monday, February 20, 2012, 2:43 PM Hello Meg - I wanted to get back to you to let you know that Justice Ridgely will only sponsor those attorneys that he knows personally -- usually through clerkships. Perhaps you could contact the U.S. Supreme Court Clerk's office to get of list of those that may be able to sponsor you. Best of luck to you!

-----Original Message-----

From: Meg Kelly [<mailto:meghankellyesq@yahoo.com>]

Sent: Wednesday, February 15, 2012 1:17 PM
To: Balke Jeannie (Courts)
Subject: Sponsor for the United States Supreme Court

Dear Honorable Henry DuPont Ridgely,

I am seeking to be admitted before the United States Supreme Court,

and I am hoping you will be willing to be one of my sponsors.

Would you please consider sponsoring my admission before the United States Supreme Court?

Thank you so much for your time and consideration.

Very truly,

Meg Kelly, Esq.
34012 Shawnee Drive
Dagsboro, DE 19939
meghankeliverson@yahoo.com
302-537-1089
Licensed DE, DC & PA

DE Bar # 4968

EXHIBIT

4

MEGHAN MARIE KELLY, ESQUIRE
34012 Shawnee Drive
Dagsboro, DE 19939
(302) 537-1089

The Honorable Peter B. Jones
Family Court of the State of Delaware
The Family Court
22 The Circle
Georgetown, DE 19947

December 10, 2009

Dear Honorable Peter B. Jones:

Thank you for taking time to meet with on December 9, 2009. Per your kind suggestion, I respectfully request that the Family Court of the State of Delaware in and for Sussex County remove my name from the rotating list of attorneys who are required to represent clients in family law proceedings due to religious reasons.

The practice of family law is against my religious beliefs. I am a Christian, and I find guidance in the Bible. The Bible provides: “[W]hat God has joined together, let man not separate.” *Citing*, NIV Mark, 10:9, and *Citing*, NIV., Matthew 19:6; *also see*, NIV., Malachi 2:16 (“I hate divorce”); NIV Genesis 2:20 (“man will ... be united to his wife, and they shall become one flesh); and, 1 Corinthians 7:10-11, (“A wife must not separate from her husband.” ... “And a husband must not separate from his wife.”).

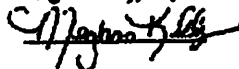
In November, to my horror, I was appointed to a guardianship proceeding. I believe such a proceeding contributes to separating “what God has joined together,” because instead of the child bringing the parents together, the guardianship proceeding usually separates a child from one of the parents, and reinforces any division between a couple.” *Id.* Accordingly, it contributes to the break of a union that God has made.

Since, I didn't want to contribute to the destruction of a union created by God, I attempted to find another attorney who could replace my appointment with no success. As a result, I contacted this Honorable Court and communicated my views and this Honorable Court kindly relieved me of the appointment.

I respectfully request that I be relieved of all appointments relating to family law proceedings. Thank you for your time and consideration.

Very truly,

Meghan Kelly, Esquire



MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939
(302) 537-1089

The Honorable Chandlee Johnson Kuhn
Family Court of the State of Delaware
New Castle courthouse
500 N. King Street, Suite 9445
Wilmington, DE 19801

October 10, 2012

Dear Honorable Chandlee Johnson Kuhn:

Thank you for excusing me from a recent appointment in October 4, 2012. I respectfully request that I also be removed from all future appointments relating to family law due to religious reasons.

The practice of family law is against my religious beliefs. I am a Christian, and I find guidance in the Bible. The Bible provides: “[W]hat God has joined together, let man not separate.” *Citing*, NIV Mark, 10:9, and *Citing*, NIV., Matthew 19:6; *also see*, NIV., Malachi 2:16 (“I hate divorce”); NIV Genesis 2:20 (“man will ... be united to his wife, and they shall become one flesh); and, 1 Corinthians 7:10-11, (A wife must separate from her husband.” “And a husband must not separate from his wife.”).

I believe that any proceeding contributing to the separation of “what God has joined together,” the destruction of marriage, is against my personal Christian beliefs. In addition to divorce proceedings, participating in guardianships and termination of parental rights proceedings also conflict with my religious beliefs because instead of the child bringing two parents together, such proceedings usually separates a child from one or both of the parents, and reinforced any division between the couple. *Id.* Accordingly, it contributes to the break of a union that God has made.

Since, I do not wish to contribute to the destruction of a union created by God, I respectfully, request that I be relieved of all appointments relating to family law proceedings. Thank you for your time and consideration.

Very truly,

**/s/Meghan M. Kelly
Meghan Kelly, Esquire
DE Bar Number 4968
34012 Shawnee Drive
Dagsboro, DE 19939**

EXHIBIT

6

Sent from my iPhone

Begin forwarded message:

From: Meg Kelly <meghankellyesq@yahoo.com>
Date: March 31, 2017 at 10:21:23 PM EDT
To: Meg Kelly <meghankellyesq@yahoo.com>, Matty R Koslerek <matthewkoslerek@comcast.net>
Subject: Fwd: DEFEATING ISIS/ISIL

Sent from my iPhone

Begin forwarded message:

From: Meghan Kelly <meghankellyesq@yahoo.com>
Date: September 3, 2015 at 10:07:42 AM EDT
To: "Wescott, Jymayce (Carper)" <jymayce.Wescott@carper.senate.gov>
Subject: Re: DEFEATING ISIS/ISIL

Thank you! You are wonderful!

Very truly,
Meg

Sent from my iPod

On Sep 3, 2015, at 9:58 AM, "Wescott, Jymayce (Carper)" <jymayce.Wescott@carper.senate.gov> wrote:

Busy morning – Thanks: I will pass on to our DC office.

JWescott
Jymayce Y Wescott
Constituent Services Director
Office of US Senator Thomas R. Carper
12 The Circle
Georgetown DE 19847
302 856-7690
302 856-3001 - Fax

Connect with Senator Carper online:

[<image001.png>](#) [<image002.png>](#) [<image003.png>](#) [<image004.png>](#)

From: Meg Kelly [mailto:meghankellyesq@yahoo.com]
Sent: Thursday, September 03, 2015 9:17 AM

To: Wescott, Jymayce (Carper) <Jymayce.Wescott@carper.senate.gov>
Subject: Fw: DEFEATING ISIS/ISIL

Thank you for your kindness and open mind Jymayce.

Per our discussions, my cousin Tim is in the Middle East, and is in charge of a prison camp. I think more violence may be fuel to ISIS's flame. Thank you for forwarding this information to the Honorable Senator Carper.

Best regards,
Meg Kelly, Esq.

Licensed DE, DC, PA, US Supreme Court

<http://www.skadden.com/professionals/tim-t-mastroiacomo>

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

From: Meg Kelly <meghankellyesq@yahoo.com>
To: WRDE <charleswatson@wrde.com>
Sent: Friday, July 10, 2015 10:14 PM
Subject: DEFEATING ISIS/ISIL

How do we defeat ISIS, not with blood, but with education. More blood will be fuel for their fire since people are being deceived that they are doing God's will by killing others and, if they should die they will go to heaven.

You have the power to prevent deception with the truth.

Last month, ISIS allegedly killed 27 Muslims during a Muslim holiday which prohibits violence, (at a mosque). ISIS is using God's name in vain, for it's own vanity and purpose by manipulating youngsters, and poor people to fight, fund and feed it's organization. ISIS is not adhering to the Koran. ISIS is like the mob. They adhere to no true religion that loves any God. They are their own Gods. People give the aid nations send to them to ISIS so they are not killed. It is logically incomprehensible that this cycle continues.

Let's educate people concerning ISIS's use of the name of God for their own purpose (NOT GOD'S). Please consider talking about this in order to prevent such deception and brainwashing. Would you be willing to talk about ISIS's use of God's name in vain (similar to the church's use during the crusades, Spanish Inquisition and arguably colonization for profit not for Christ, as acknowledged recently by our Pope recently)?

CSPAN had a program where witnesses explained that ISIS stole artifacts from countries and tried to sell them. Days later, on the regular news I saw alleged threats from ISIS and evidence of the destruction of certain artifacts. This is a brilliant way to increase demand and sell/save the artifacts for more money. CSPAN would permit you to use clips of the witnesses if you made a request.

[Contact I.C-SPAN.org](http://www.C-SPAN.org)

Contact | C-SPAN.org

Contact Main Office 400 N. Capitol St., NW Suite 650 Washington, DC 20001
(202) 737-3220 (Mon-Fri 8:30am-5:30pm ET) Program Inquiries & Suggestions

Viewer Inquiries :

Visit us at www.c-span.org

Preview by Yahoo

I don't think bloodshed will logically solve threats to our Nations security or prevent harm to people in other countries.

As a result, it's also a bad idea to train others to fight as we cannot control them and more blood will not bring peace. I have heard politicians request the US send weapons and train certain Sunnis (they believe a caliph can come from someone outside the lineage of Mubazzmed) so they can fight ISIS an alleged sect of Shiites (they believe the caliph must come from the lineage of Muhammed).

Say the trained Sunis succeed. They have been killing people of the same faith who allegedly love the same God because they disagree about who should lead their people. What's stopping the potential trained fighters from killing people with more fundamental differences like Jews and Christians if they are so willing to kill people of the same faith?

I think you have more power to stop violence through education than anyone else. Please think about it.

I imagine last months massacre at the mosque gave ISIS a lot of bad press, as today on yahoo news saw member of ISIS allegedly providing food to the poor. See, <http://news.yahoo.com/offers-mix-brutality-charity-during-ramadan-053544476.html>

If ISIS in fact did this, it was probably an attempt to create positive publicityer last months poor decision.

I am sad about such unnecessary deaths. Will you please think about reporting on this? I have loved ones out there, and I do not want our troops to be in harms way unnecessarily.

Thank you,
Meg

EXHIBIT

8

Federal Congress

Please Kill the License to Drill

My name is Meghan Kelly. I ran as a Democrat candidate for House of Representatives in the 38th District, and was defeated. The Republican candidate was Mr. Ronald E. Gray. Mr. Gray and I appear to agree on some matters, including our opposition to oil drilling.

I applaud my opponent for openly taking a stand against oil drilling. I too strongly oppose drilling off shore of our beautiful Delaware coast. Unfortunately, only the federal legislators, not the state legislators can prevent this. So, neither of us can prevent oil drilling by passing state laws.

President Trump's authority to drill oil under Executive Order 13795 is granted through a statute, not the Constitution. The Federal Congress has the ability to remove his authority to drill oil by amending the statute granting the President such power by passing either HR 341. The timing Congress may use this power effectively is limited.

Once the drilling starts, it will be difficult to stop. Certain defenses such as promissory estoppel and detrimental reliance may prevent attorneys from stopping it in court. So, it is important for federal legislators to act swiftly.

To worsen matters, on April 10, 2019, President Trump two additional executive orders that allegedly has expedited the leasing of offshore spaces for oil drilling, Executive Orders 13867 and 13868.

Please urge the Federal legislators to act now!

The administration cleverly timed the offshore leases with knowledge of distractions that may prevent our leaders from acting within a timely fashion.

1. People get blind sighted by dollar signs dancing before their eyes. The Bureau of Ocean Energy Management (BOEM) is handing out money to various entities to perform research on the suitability of offshore work.
2. The federal legislators are focused on the election instead of drafting laws.
3. The United States Supreme Court is back logged.

By the time the Court hears the case, even if the required legislation is passed, it may be too late to prevent it. Conversely, there is also a danger litigation may be brought too early. There is only a short window to act, please federal congressmen, help us.

The current cases pending before the United States Supreme Court will likely be kicked out should they be heard too early (not ripe for adjudication), as there is no standing. Meaning the potential injury is not concrete. It is too speculative since the BOEM has not narrowed the scope of exactly where they will permit drilling off shore. Instead, the BOEM is providing funds to Universities and other organizations to perform studies on the suitability of offshore drilling and potential impact.

Any jobs that may be created by drilling are not worth the potential injury to our loved one's health, lives and livelihoods in our beautiful resort towns.

Please persuade our federal representatives to remove President Trump's authority to drill before we become another Dakota pipeline.

Passing HR 341 will not remove the government's ability to lease offshore territory for alternative energy sources such as, solar, wind or wave power. Please encourage our legislators to keep an open mind. Learning makes us smarter. Do not be scared of alternative clean energy. Be scared of dirty energy causing pollution that has been linked to human and environmental death.

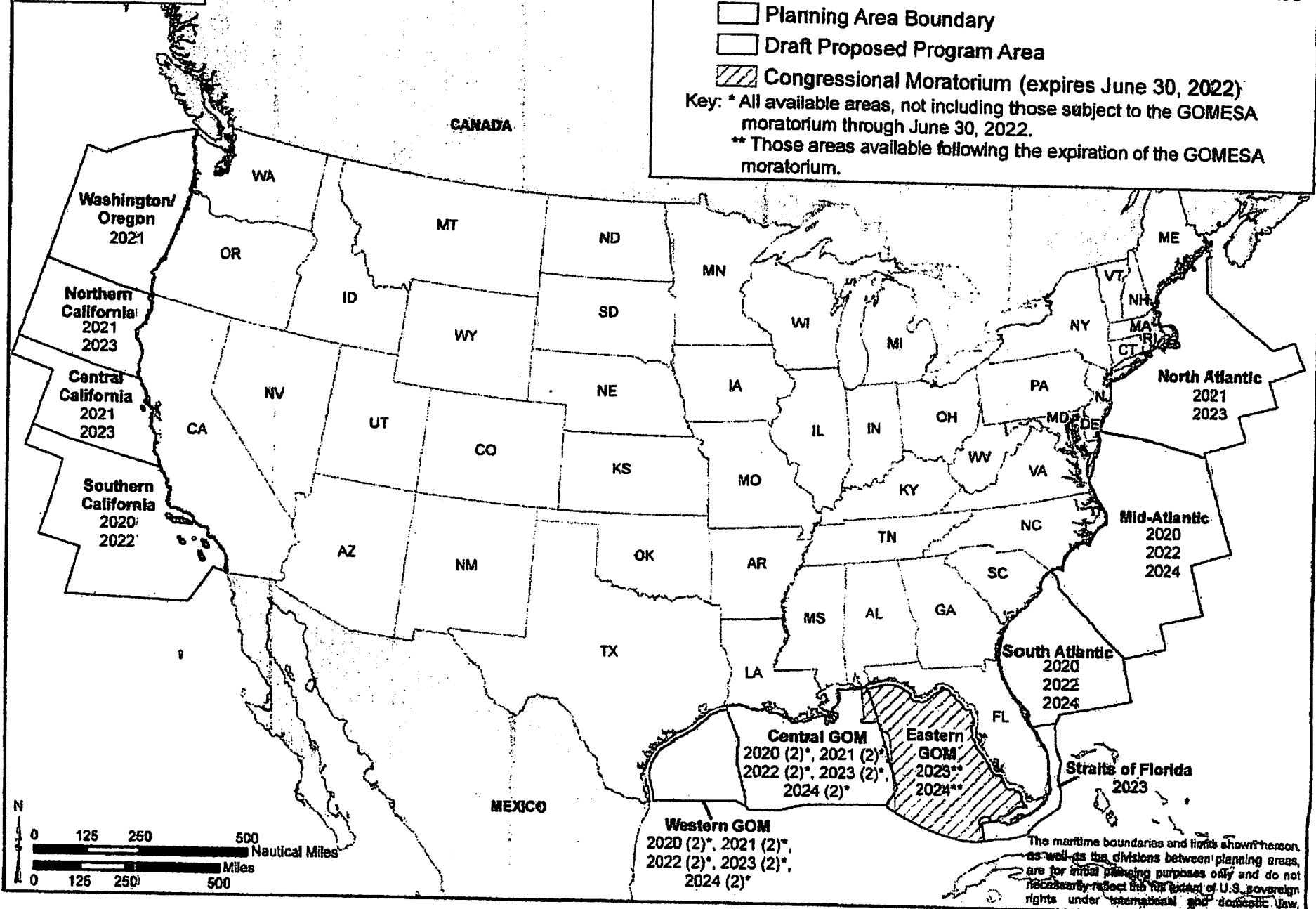
Thank you for your time and consideration to this important matter.



**2019–2024 Outer Continental Shelf Oil and Gas Leasing
Draft Proposed Program Areas and Sale Years: Lower 48 States**

- Planning Area Boundary
- Draft Proposed Program Area
- Congressional Moratorium (expires June 30, 2022)

Key: * All available areas, not including those subject to the GOMESA moratorium through June 30, 2022.
 ** Those areas available following the expiration of the GOMESA moratorium.



The maritime boundaries and limits shown hereon, as well as the divisions between planning areas, are for initial planning purposes only and do not necessarily reflect the full extent of U.S. sovereign rights under international and domestic law.

EXHIBIT

2

EFiled: Mar 03 2020 10:00AM EST
Transaction ID 64781595
CASE NO. 2020-0157-



**SUPPLEMENTAL INFORMATION PURSUANT TO RULE 10A
OF THE RULES OF THE COURT OF CHANCERY**

The information contained herein is for the use by the Court for statistical and administrative purposes only. Nothing stated herein shall be deemed an admission by or binding upon any party.

1. Caption of Case: Meghan Kelly, Plaintiff v The Democratic Chair, Erik Praxe - Schrumm in her
Erik Schrumm; individually and in his capacity as the Chairman of the Democratic Party for the State
of Delaware, Anthony Albence, Kathleen Jennings, The Delaware Department of Elections, Sussex County
Department of Elections, Kent County Department of Elections, New Castle County of Elections, the Democratic
Party of the State of Delaware.

2. Date Filed: 3/2/20

3. Name and address of counsel for plaintiff(s):

Prose. Meghan Kelly
34612 Shawnee Drive
Dagsboro, DE 19939

4. Short statement and nature of claim asserted: Defendants require as a condition precedent that Meghan Kelly
violate her religious beliefs in Jesus by conforming with the filing fee and signature requirements under
Del C. § 3103(a)(1)(a) in order to be placed on the ballot as a democratic candidate for the US
House of Representatives seat, in violation of Meghan Kelly's first Amendment Rights, applicable to Defendants
pursuant to the 14th Am. under this class of one, as applied to Meghan, including her rights of free exercise of
religion, speech, association, and the right to run for office without disobeying God, essentially selling her soul

5. Substantive field of law involved (check one): to Selun

- | | | |
|--|---|--|
| <input type="checkbox"/> Administrative law | <input type="checkbox"/> Labor law | <input type="checkbox"/> Trusts, Wills and Estates |
| <input type="checkbox"/> Commercial law | <input type="checkbox"/> Real Property | <input type="checkbox"/> Consent trust petitions |
| <input checked="" type="checkbox"/> Constitutional law | <input type="checkbox"/> 348 Deed Restriction | <input type="checkbox"/> Partition |
| <input type="checkbox"/> Corporation law | <input type="checkbox"/> Zoning | <input type="checkbox"/> Rapid Arbitration (Rules 96,97) |
| <input type="checkbox"/> Trade secrets/trade mark/or other intellectual property | | <input type="checkbox"/> Other |

6. Related cases, including any Register of Wills matters (this requires copies of all documents in this matter to be filed with the Register of Wills):

N/A

7. Basis of court's jurisdiction (including the citation of any statute(s) conferring jurisdiction):

10 Del C § 341

8. If the complaint seeks preliminary equitable relief, state the specific preliminary relief sought. TRO in
tht Defendants be restrained from completing the ballot preparation process without including the name of Meghan Kelly
as a democratic candidate for the US House of Representatives for the upcoming primary.

9. If the complaint seeks a TRO, summary proceedings, a Preliminary Injunction, or Expedited Proceedings, check here . (If #9 is checked, a Motion to Expedite must accompany the transaction.)

10. If the complaint is one that in the opinion of counsel should not be assigned to a Master in the first instance, check here and attach a statement of good cause. _____

Meghan Kelly 4968
Signature of Attorney of Record & Bar ID

EFiled: Mar 03 2020 10:00AM EST
Transaction ID 64781595
Case No. 2020-0157-



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

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

Civil Action No.:

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

**ON THE 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 persecution 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.

L. PLAINTIFF'S RELIGIOUS BELIEF

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

140. I am a registered democrat.

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

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

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

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

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

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

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

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

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

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

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

Thank you,
Meg" (See, Exhibit 32)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

160. I am priceless, not a price tag.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

176. I left the Democratic headquarters.

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

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

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

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

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

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

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

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

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

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

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

188. **The anticorruption handout originally included, in part:**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

202. There is no sin in mere business.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

IV. PLAINTIFF'S FUTURE INTENT

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

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

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

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

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

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

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

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

too are sadly children of the devil, not yet adopted by the God that loves them and seeks to save these confused kids from the misbehaving dad, the devil, who seeks to harm them, others and damn them to hell. (See Matthew 13:38 regarding "children of the evil one"); (See, John 8:44 and 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 unhardden 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

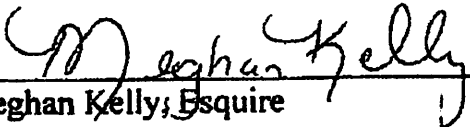
/s/Meghan Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
(772)332-9719
pro se
Bar Number 4968

EFiled: Mar 03 2020 10:00AM EST
Transaction ID 64781595
Case No. 2020-0157-



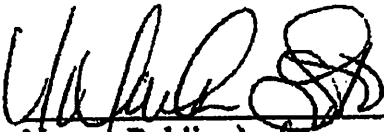
VERIFICATION

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



Meghan Kelly, Esquire

SWORN TO AND SUBSCRIBED before
Me this 2nd day of Feb., 2020.



Notary Public
Printed Name: Yolanda Yvonne Soto
My Commission Expires: April 6, 2020

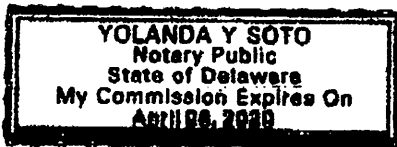


Exhibit 7

Law library/21-1490

From: Meg Kelly (meghankellyesq@yahoo.com)

To: ryan.costa@delaware.gov; zi-xiang.shen@delaware.gov; david.weiss@usdoj.gov

Bcc: meghankellyesq@yahoo.com

Date: Wednesday, December 15, 2021, 04:49 PM EST

Good afternoon,

I hope you are safe and well.

I am concerned. The law librarian has access to PACER, allegedly for the DE Supreme Court. She said the Supreme Court gave them their password. When I called PACER from the law library concerning fees, the representative indicated the DE Courts do not use pacer and should not require pacer. Only the federal courts use it. Then, the law librarian started making up reasons why the DE Supreme Court paid for pacer. I think they intend to sue me in retaliation of the exercise of my First Amendment rights. I mentioned that on my exhibits, admissible as a presence sense impression should anything happen to me.

I think the DE Supreme Court seeks to take me out by demeaning my reputation.

I do not believe the same as others. I should not be punished for having different religious beliefs. Jesus teaches people go to hell if they allow their desires for security in money to control their life. I do not serve money. I choose God as master.

Do you see how our leaders are misled by money, by money they allowed the federal reserve and private entities to control by creating out of nothingness, and how the government sins by controlling people by money, penalties and profit, instead of safeguarding their freedom with just decrees? If you could persuade the Courts this is a violation of the 13th, you may prevent the planned crash. The government must govern, not be governed by money. The Government must take control of money to care for the people, and safeguard freedom.

I was tearing up when I wrote this without sending it. I am allowed to think differently, as an individual, and believe differently. Collectively, we are weaker by conformed conditionally thinking. Individually we are stronger together by offering diverse views to improve or adapt to situations. We must protect the freedom of the individual. Otherwise, none are free but forced to conform to the beliefs and thinking of whoever controls the conformed, conditioned group believing, making their will be done like Satan. Instead of laying down our will, our wants, and desires to care to think, care to know, care to love others and to even love ourselves.

Regardless as to what happens to me, there is a plan to crash the economy, to overthrow our government's power to govern, taken over by private partners. I need to help you understand. So maybe you can be the hero, no matter what happens to me. I thought about seeking a mistrial in my case against Trump/Biden, but I feel like crawling up into a ball just thinking about it. If that is the case, David Weiss you will be opposing counsel.

There is a plan to increase desperate conditions, to force folks out of their homes, for the government to take their real property, only for the property to be taken from the government to be controlled by the government's creditors. 47 percent of Americans are scheduled to be unemployed by 2026-27 to work as slaves, unpaid for government welfare in violation of the 13th amendment before more are slaves to a fiefdom system, not communism or capitalism, something much worse. See Attached from the book I previously sent you written in 2015. The book also talked about bio war viruses. When they talk about it, that means they plan on unleashing it. Gates is a partner in the world economic forum. You are Attorney Generals. You have the power and position to reverse or prevent an economic crash.

You must protect those you correct, even if you correct by guiding the President, courts and congress. You are the advocates who are charged to guide those misled by lawless vanities.

You may be my opponents in name only, as I hope you will be heroes to save not only the US, but the world.

It is pretty scary the DE Supreme Court got pacer to go after a peon like me. I do not feel safe. The democrats wanted to eliminate me per my exhibit to the complaint (Complaint against Democrats to run for office without violating my

religious beliefs) prior to the pandemic because I was not on board with their massive bad healthcare plan. It is so strange. I noticed misbehaving companies donated to both sides when I ran for office. Artesian gave to my former opponent Ron Gray and the Democrats in upper DE. It is the same on the federal level. Our leaders are dumb and blind, blinded by money and support. They do not see clearly or hear the sirens of danger ahead.

Did you see the UN's proposals? Clean energy done dirty is still dirty. They propose unjust laws, making the common man pay more so the common man uses less, creating less pollution at the cost of potential suffering and loss of liberty, making everything for sale, even the air we breathe. We will no longer be free to merely be alive.

The proposals of alleged clean deteriorating products cause pollution in the production of replaced products, and unnecessary expenses for the consumer, debt to control the consumers forced to buy replacement products, as opposed to made to last, made to work products.

I support cleaning and safeguarding the environment through just decrees I proposed long ago that lifts the burden off the back of the common man, not increasing the it like Biden and the UN's proposes do.

Notice, per the attached article, Janet Yellen wants to decrease help, as she increases interest rates which will increase folks' need for help. Janet Yellen is not our friend. She has a conflict of interest with the American people, and the interest of the US as former Chair of the Federal Reserve. She has also spoken at the BIS, Bank of International Settlements. Her former colleagues make more money the more debt, the worse off America and Americans and the world is.

Thank you for caring to read my thoughts. The plans are happening quicker than the book outlines. I was not expecting 47 percent of the population to be unemployed by design until 2026-2027, but it may happen sooner. Remember those who make money out of nothingness, the central banks, the BIS, the World Bank, even small banks gain control over people by the debt, not just profit. Poor China, indebted to the World Bank. We are not poor, though we are indebted to the World Bank and China, along with other entities. We can take back the coining power and coin out of nothingness without borrowing or paying interest like Presidents Lincoln and Kennedy proposed to fully pay back all of our debt. We could require banks lend out from their own reserves, to gamble with their own money, unbacked by the US. This will prevent inflation since they will be more careful. No longer will the tax payer fund bad business. The Fed should coin money to pay for their workers too, ensuring pensions will be honored. I have ideas to create a deflation too. So folks' dollars will go farther, but there is no hope of that if the World economic forum and their cohorts, including all of our Presidents, even former President Trump's daughter attended these. They all have dirty hands in need of court correction, not condemnation, to potentially save them too, by being made clean. The World Economic Founder outlines a lot of ways on eliminating freedom and controlling people in the 2015 book, even our clothes. Keep your old clothes. They want to make new clothes with sensors to control people, not to help them, under the guise of helping them.

The entire world is in danger. I hope you choose to be the heroes we need.

Love and thanks,
Meg



2015 book concerns 4th industrial rev.pdf
552.7kB



Art increase rates while decrease help spells disaster.pdf
192.1kB

Exhibit 8

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939
(302) 537-1089

The Honorable Henry DuPont Ridgely
Supreme Court of Delaware
502 South State Street
Dover, DE 19901

RE: INFORMAL COMMENTS ON CLE

October 1, 2012

Dear Justice Ridgely:

Thank you for participating in the CLE. I enjoyed it immensely. However, I had some concerns.

I was concerned by the appearance of some of the speakers' partiality towards Delaware attorneys. Every attorney that comes before a Delaware Court should be treated the same regardless of where they are from. The Court should not take a Delaware attorneys word over an out of state attorneys word solely on the illogical basis that the Delaware attorney is from Delaware.

I was also concerned about the comment that a judge let an out of state attorney practice pro hac vice because they were from a "respectable firm." I think all attorneys should be held by the same standard regardless of the size or reputation of the firm. They should be looked at as individual attorneys who will potentially have influence within the courts in this state.

On the other hand, I was very impressed by your graceful demeanor. You did not show partiality, nor did you support the above referenced remarks. Instead you sat back silently like a wisdom filled father observing all behavior. Thank you for being a good model for judges and attorneys.

Unfortunately, I have seen partiality towards Delaware attorneys in my practice. In fact during my first appearance in this state a judge accused me of being a "Philadelphia lawyer," as if this was a bad word.

I also worked with Delaware lawyers who grew up in other states, and I was surprised that some lawyers treated me differently because I grew up here. They would treat me with respect, lend me forms offer to meet me for lunch etc...Conversely, I recall how some Delaware attorneys mistreated my former non-native colleague by condescendingly describing "how things are done in Delaware" and "the Delaware way." I recall with disappointment that some Delaware lawyers even used bad language to discuss the Delaware way. I think such language and partiality makes Delaware attorneys look bad. Although it's nice to be given preferential treatment because of where I grew up it does not make it right.

On a personal note, one of the reasons why I became a lawyer was my faith, Christianity. Under my faith, Jesus Christ was executed for no lawful purpose. Instead he died as a result of the passion of the people instead of logic and reason under the law. That is wrong. The judicial system should remain impartial, and individuals should not face such irrational persecution. Nonetheless, this is not the case in our world. That is why I went to law school. And that is why I think it's important to bring my concerns relating to partiality before this Honorable Court to you.

You are the law and all attorneys including myself will strive to adhere to this Honorable Courts wishes. Further, you are the law for all of the lower courts as well. Accordingly, all judges will also strive to adhere to your wishes. Will you please consider discussing the importance of being impartial to your peers?

Thank you for being a good role model and for making a positive impact on Delaware attorneys and Delaware Courts, and thank you for considering my comments.

Have a good week.

Very truly,

**/s/Meg Kelly
Meghan M. Kelly
34012 Shawnee Drive
Dagsboro, DE 19939
(302) 537-1089
DE #4968**

Exhibit 9

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939

**Clerk of the Supreme Court
55 The Green
Dover, DE 19901**

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

November 22, 2021

Dear Clerk:

I intend to object to the ODC's attached request for appointment of counsel with regards to the above referenced matter for me on religious grounds, and object to potential costs too. Albeit the letter noted the appointment of an attorney would be "without cost."

Thank you.

Very truly,

/s/Meghan Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
No Phone
meghankellyesq@yahoo.com
Bar Number 4968

CC: Office of Disciplinary Counsel Patricia B. Schwartz

Exhibit 10

|

Re: [DSBA] So much news to share...please read.

From: Christie McDonnell (christie.mcdonnell@mcdonnelllawfirm.com)

To: meghankellyesq@yahoo.com

Date: Friday, August 6, 2021, 03:57 PM EDT

Thanks, Meg! I hope you are doing well.

Christie McDonnell
Chief Strategy Officer
(866) 931-8793 (office)
Christie.McDonnell@McDonnellLawFirm.com | McDonnellLawFirm.com

This message and any attachments are solely for the intended recipient and may contain confidential or privileged information. If you are not the intended recipient, any disclosure, copying, use, or distribution of the information included in this message and any attachments is prohibited. If you have received this communication in error, please notify us by reply e-mail and immediately and permanently delete this message and any attachments. Thank you.

On Aug 6, 2021, at 9:06 AM, Meg Kelly <meghankellyesq@yahoo.com> wrote:

FYI, in case you do Delaware work.

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

From: Mark Vavala <mvavala@dsba.org>
To: dsba@delawlist.org <dsba@delawlist.org>
Sent: Friday, August 6, 2021, 07:16:47 AM EDT
Subject: [DSBA] So much news to share...please read.



NEWS FROM YOUR BAR ASSOCIATION - some important stuff...read on!

DSBA's Ethics Committee Tackles a Timely and Relevant Issue:

If you work from home on a Delaware case but your home is in a state where you are not licensed...is this Unauthorized Practice of Law?

Exhibit I

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939

Office of the Clerk

RE: Client declined services/*ODC v Meghan Kelly, Misc 541, Board Case No. 115327-B

December 21, 2021

Dear Clerk:

On Monday December 20, 2021, I filed a motion for reconsideration of the Order dated December 13, 2021 appointing counsel, despite my objection.

I assumed counsel made an appearance since delivery of the Board's notice of hearing was sent to him instead of me. It was inappropriate for the Board or the petitioner to send him notice instead of me. Acceptance of representation had not been made, and petitioner and this Court had notice of my objection to the appointment of counsel.

After I filed the motion, I called Lisa Dolph of the Delaware Supreme Court from the law library to determine whether an appearance had been made. She kindly granted me great relief and said there was no appearance made by counsel.

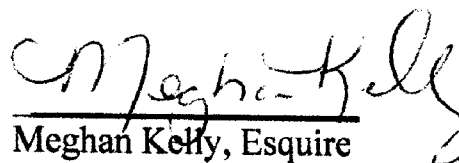
I immediately emailed appointed counsel, the letter indicating, "I decline representation. Your services are not accepted." He confirmed receipt per the attached.

I respectfully request the court honors my wishes to represent myself preventing the need to brief the issues.

Thank you for your consideration of these important matters. I hope you stay safe and well.

Very truly,

Dated December 21, 2021



Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
No Phone
meghankellyesq@yahoo.com
Bar Number 4968
(Word Count 875)

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

Dated: December , 2021

Meghan Kelly (printed)

Meghan Kelly (signed)

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939

**Clerk of the Supreme Court
55 The Green
Dover, DE 19901**

**RE: ODC Board Case No. 115327-B (Meghan M. Kelly, Esquire),
Representation is not accepted**


December 20, 2021

Dear David Hutt, Esquire:

I decline representation. Your services are not accepted.

Thank you.

Very truly,


Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
No Phone
meghankellyesq@yahoo.com
Bar Number 4968

RE: Board Case No. 115327-B/

From: Hutt, David C. (dhutt@morrisjames.com)

To: meghankellyesq@yahoo.com

Date: Monday, December 20, 2021, 06:03 PM EST

Received. Thank you.

Morris James_{LLP}

David C. Hutt | Partner

107 W. Market Street, P.O. Box 690, Georgetown, DE 19947

19339 Coastal Highway, Suite 300, Rehoboth Beach, DE 19971

Phone: 302.856.0018 | Fax: 302.856.7217

morrisjames.com | dhutt@morrisjames.com

Facebook | LinkedIn | Twitter

This communication may be subject to the attorney-client privilege or the attorney work product privilege or may be otherwise confidential. Any dissemination, copying or use of this communication by or to anyone other than the designated and intended recipient(s) is unauthorized. If you are not the intended recipient, please delete or destroy this communication immediately.

From: Meg Kelly <meghankellyesq@yahoo.com>

Sent: Monday, December 20, 2021 3:42 PM

To: Hutt, David C. <DHutt@morrisjames.com>

Cc: Meg Kelly <meghankellyesq@yahoo.com>

Subject: Board Case No. 115327-B/

Good afternoon,

Thank you for the message.

Please see attached.

Best regards,

Meg

Exhibit J

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939

**Clerk of the Supreme Court
55 The Green
Dover, DE 19901**

**Karlis Johnson
405 N. King Street, Suite 505
Wilmington, DE 19801**

RE: 6th Amendment right to self-representation/Postpone hearing in interests of justice/Missing docket items for Motion must be included in the interest of justice/ ODC Board Case No. 115327-B (Meghan M. Kelly, Esquire)

December 29, 2021

Dear Clerk:

On December 24, 2021, I received Notice of a Hearing, dated December 10, 2021, post stamped December 21, 2021. The hearing is about two weeks away, with no determination by the Court on my exercise of self-representation under the 6th Amendment, and on religious grounds, and on my request to the Board 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. (Exhibit A, Aug. 23 letter, See Exhibit A part 2, Petition at Paragraph 7, relating to the state's reason for the petition is my religious beliefs and speech reflecting and defending the exercise of those beliefs through speech in the petitions, constitutionally protected activity).

On Thursday December 16, 2021, to my utter horror, and despite notice of my intent to object to appointed counsel, I discovered this court appointed counsel. (Exhibit B, present sense impression of horror).

On Friday, December 17, 2021, the appointed counsel contacted me, and I immediately objected to his appointment.

He made it appear I had no choice. I have a choice. The next day, Saturday, I sent out the December 18, 2021, filing to the Board concerning requesting postponement of the hearing date until after 1. Discovery 2. A final order on self-representation, including appeals, and alerted them of my intent to draft and file a motion on Monday, December 20, 2021. I intend to gather evidence to dismiss this case on subject matter grounds. (Exhibit C Notice to the DE Supreme Court of my intent to dismiss this case on subject matter grounds, Exhibit C Part 2).

On Monday, December 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* ("Motion") with the Delaware Supreme Court via First Class mail, and sent a copy of the filing the next day to the Board, with a copy of that service filed with this court via first class mail, and a copy via

email to the Board, albeit latter for the Board's convenience and confirmation.

(Exhibit D).

I object to David Hutt as standby attorney or as a representative on behalf of me in any matter in this case. I made my objections known to the state. (Exhibits E, F, G, H).

Additionally, it is highly prejudicial that the exhibits were not included in my Motion the Court sent to David Hutt, and David attached to his most recent Motion he copied to the court and me, as the context of my assertions may not be understood by the reader(s) of my Motion. (See Exhibit I, J). I emailed the Court and the Board all of the filings relating to the Motion, and required they be included on the attached docket the Court kindly sent me. (Exhibits Id. And K). Should I appeal any decision of the Board, I may need to cite the exhibits contained therein.

In the interest of justice all the documents I filed documents must be included on the docket, including the exhibits to the motion on Docket Item Number 6, and the hearing before the board must be postponed. I contacted the Board on December 28, 2021 via two attempts to the Administrator of the Delaware Supreme Court Karlis Johnson, by the law library's phone, and via email. (Exhibit L).

Thank you for your time and attention to this important matter.

Dec. 29, 2021

Respectfully submitted,

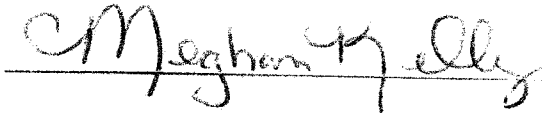


Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
No Phone
meghankellyesq@yahoo.com
Bar Number 4968
No phone
(Word Count 594)

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

Dated: December 29, 2021

Meghan Kelly (printed)

 (signed)

THE SUPREME COURT OF THE STATE OF DELAWARE

In the Matter of a Member of the Bar of the Supreme Court of the state of Delaware
Meghan M. Kelly, respondent.) Misc 541
) Board Case No. 115327-B
)
)

CERTIFICATE OF SERVICE
OF LETTER DATED DECEMBER 29, 2021, AND ATTACHMENTS
THERE TO RELATING TO *RESPONDENT'S 6TH AMENDMENT RIGHT
TO SELF-REPRESENTATION / POSTPONE HEARING IN THE INTEREST
OF JUSTICE / MISSING DOCKET ITEMS FOR MOTION MUST BE
INCLUDED IN THE INTEREST OF JUSTICE*

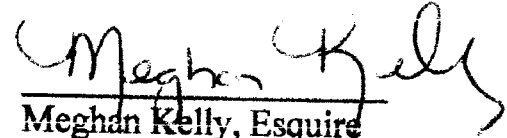
I, Meghan M. Kelly, Esquire, hereby certify that on the 29th day of
December, 2021, I had a true and correct copy of Respondent's Letter, and
attachments thereto, dated December 29, 2021, regarding *Respondent's 6th
Amendment right to self-representation / Postpone hearing in interests of
justice / Missing docket items for Motion must be included in the interest of
justice*, sent to, served via first class mail to:

Karlis Johnson
405 N. King Street, Suite 505
Wilmington, DE 19801,

Disciplinary Counsel Patricia B. Swartz
405 N. King Steet, Suite 420
Wilmington, DE 19801

Respectfully submitted,

Dated December 29, 2021



Meghan Kelly, Esquire
DE Bar Number 4968
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com

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

Dec 29, 2021 Meghan Kelly (printed)

Meghan Kelly (signed)

Exhibit A

Office of Disciplinary Counsel
SUPREME COURT OF THE STATE OF DELAWARE

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

DAVID A. WHITE
Chief Disciplinary Counsel

PATRICIA BARTLEY SCHWARTZ
Disciplinary Counsel

KATHLEEN M. VAVALA
Disciplinary Counsel

August 23, 2021

CONFIDENTIAL
VIA EMAIL & U.S. MAIL

Meghankellyesq@yahoo.com

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

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

Dear Ms. Kelly:

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

Under Rule 9(a) of the Delaware Lawyers' Rules of Disciplinary Procedure, the ODC "shall screen and evaluate all information coming to its attention by complaint or otherwise concerning possible misconduct by or incapacity of a lawyer." Procedural Rule 19 (c) provides "Information relating to a lawyer's physical or mental condition which adversely affects the lawyer's ability to practice law shall be investigated by the ODC. If there are reasonable grounds to believe the interests of respondent's clients or the public are endangered, such information shall be the subject of formal proceedings to determine whether the respondent shall be transferred to disability inactive status. The procedures and hearings shall be conducted in the same manner as disciplinary proceedings. The Board may take or direct whatever action it deems necessary or proper to determine whether the respondent is so incapacitated, including the examination of the respondent by qualified medical experts at the respondent's expense. If, after reviewing the recommendation of the Board and upon due consideration of the matter, the Court concludes that the respondent is incapacitated from continuing to practice law, it shall enter an order transferring the respondent to disability inactive status for an indefinite period and until further order of the Court."

DE Supreme Court pleadings too

relate to claims under the Freedom of Religion restoration act to prevent government sponsored burden on my free exercise of religion. My religion beliefs are in issue. The speech and petitions relate to my religion beliefs and exercise of the 1st Amendment. Suspected retaliation

Exhibit A part 2

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

(Respondent's Second Amended Complaint filed in the Court of Chancery, attached as Exhibit A).

My goal is for this Court to pull out the roots of unrest, the weeds of greed stemmed under the guise of religious freedom, when it is whoredom, by barter or exchange, business, not freedom, at the cost of something more precious than money, my, and my fellow Americans' freedom to worship or not according to the dictates of our own conscience without government-sponsored persecution, based on established government-religion.

* * *

I believe the Executive Orders tempt churches to partner with government in a bought, not free union of government-religion to serve Satan by chasing after money under the guise of God, as they exploit the needy to serve the greedy, including their own greed. God teaches us "to seek the kingdom of heaven first," that we "cannot serve God and money, and that "the love of money is the root of all evil." Citing *Matthew* 6:24-33, and *1 Timothy* 6:10.

* * *

Christians are known by their love, unconditional love, "love not self seek 2". The lost are known by their absence of love. "Gnostic" citro

Biblical term, the mark of the whore for hell

the bride of Christ marked by absence of God, absence of unconditional love, living based on desires, like blind and dumb beasts easily misled by those who tempt and entice desires to harm and hell without repentance to become eternally sad and bitter

The "A" of a whore" means the mark of the beast known by what people think about as if written on their forehead, and how they live as if written on their hearts.

6. In September 2020, Respondent filed a lawsuit in the Court of Chancery of Delaware against former-President Donald Trump: *Meghan Kelly v. Donald Trump*, Case No. 2020-0809 (September 21, 2020). The Court of Chancery dismissed Respondent's complaint. Respondent appealed to the Supreme Court of Delaware, which affirmed the Court of Chancery. On August 23, 2021, Respondent filed a writ of certiorari with the Supreme Court of the United States.

7. The factual averments, argument, and other content in Respondent's filings in the Delaware courts, raise serious concerns regarding her mental capacity to practice law. Respondent's statements and arguments: lack focus and clarity; are objectively illogical; and rely on non-legal sources, including the Bible, instead of appropriate legal authority. The following excerpts demonstrate, by way of example only, Respondent's apparent inability to make cogent, rational legal arguments:

13. The President's words and conduct supporting religion, as discussed below, were accepted as truth by many, thereby, instilling the belief, supporting the President's perceived thinking or conduct or his candidacy, despite all of his sinful misbehavior and in a way supporting his sins, as excusable without confession or without repentance, is supporting God, when I believe sinfully doing your own will leads to damnation. (Mark 8:34, "Whoever desires to come after Me, let him deny himself (meaning not doing their own will, their own selfish, sinful desires, but exercise self-discipline, using their mind, their brain, which is their free will to do God's will, love), and take up his cross, and follow Me (by love in truth, not lusts in deception)."); Also see, (Matthew 16:24, Luke 9:23 regarding the same message of personal sacrifice to follow Jesus).

Religious beliefs

Exhibit B

21-1490 Examples of meg asking the government for relief on religious beliefs or grounds

From: Meg Kelly (meghankellyesq@yahoo.com)

To: zi-xiang.shen@delaware.gov; ryan.costa@delaware.gov; david.weiss@usdoj.gov

Cc: meghankellyesq@yahoo.com

Date: Thursday, December 16, 2021, 02:55 PM EST

Oh my gosh,

I just opened the mail and am tears. Your clients asked for appointed counsel against me via letter not motion. Right when I was thinking about asking your clients to consider dropping her case in exchange for me to drop my own. So I could work at my old law firm and give my dad his car back because he needs it. He gave me his car because they were ashamed of my old ugly car when I ran for office. :(I was planning on using their company car at my old law firm when they took me back. I guess that idea is off the table.

I am in tears. Patricia knows it is against my religious belief to have appointed counsel. I would allow the holy spirit be my advocate against me for her case against me for my belief in Jesus Christ. This is my religious belief, even if you think and believe differently.

Patricia has had her eyes on me for some time and noted with a frown when I ran for office (safeguarding freedom of religion and not forcing or sharing my religious views in that capacity.). My faith in God is the most important thing in my life. I gave God my life, not man to exploit for money and material gain. I believe people distort scripture to oppress the least of these for material gain. I am allowed to believe differently than government religious partnerships teach. I am in tears, please consider helping me to safeguard all humanities freedom to think, believe by the dictates of their own conscience.

I am not sure what I will do. File a motion to dismiss for lack of subject matter since the DE Supreme Court participated or appeared to participate and instigate the case by the ODC. I do not want to waive the jurisdiction issue by filing the motion with the DE Supreme Court, the Court that participated in retaliation against me, or at least an agent of the court instigated the ODC complaint.

I want to show you exhibits including the one I talked about Judge Smalls without referring to his name. Exhibit 5.

I am in tears. I should not be punished for contacting all 541 federal congress people to impeach, for drafting impeachment articles, for proposing policies and laws that lift the burden off the backs of the people to make them freer without compromise, for standing up for my belief in Jesus without government sponsored persecution for my religious//political beliefs, even standing up to Presidents Trump and Biden to safeguard freedom to worship without government physical, social or economic sponsored penalty.

Please help me or work with me on a settlement where I do not have to sell my soul in order to have a license to practice law, where I am not forced to violate my religious beliefs to exercise fundamental rights.

Money is not master. So, I proposed ways leaders may control money to care for the people, instead of being controlled by it to oppress the people to gain more money.

I can try to expedite my case in the 3rd circuit. I am willing to talk and work with you. The economic crash is on the back burner and is important to prevent, but my faith and the freedom of all humanity to freely think and freely believe is on the line too. I am willing to talk to you and brain storm on how to safeguard our fundamental freedoms, by focusing on the violations against me. And, although it is on the back burner, I am willing to work with you to prevent or reverse the planned elimination of the dollar and global crash, even beyond this law suit.

I am beyond upset now. I am open to your suggestions.

Thank you. Attached, please find some of the exhibits I included, and the articles I proposed to impeach former President Trump.

Have a good night.

Meg



Exhibit 3 to App F Email to Court regarding swearing violates Jesus s teachings.pdf
108.8kB



Exhibit 4 to Appendix F Family law violates Jesus s teachings.pdf
109.3kB



Exhibit 5 to App F regarding impartiality and bias of judges is not okay.pdf
84.1kB



Exhibit 6 to App F Email for Senator Tom Carper Use of Religion for vanity to serve war money not good.pdf
118.3kB



Exhibit 8 to Appendix F Proposal to prevent oil drilling.pdf
179.8kB



Exhibit 2 to Appendix F complaint against democrats.pdf
2.7MB

Exhibit C

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939

**Clerk of the Supreme Court
55 The Green
Dover, DE 19901**

**RE: ODC Board Case No. 115327-B (Meghan M. Kelly, Esquire), Objections
lack of subject matter**

November 23, 2021

Dear Clerk:

I intend to file objections to the Office of Disciplinary Counsel's ("ODC's") petition filed on November 4, 2021, with the Board on Professional Responsibility to transfer me to disability inactive based on lack of subject matter jurisdiction.

The evidence will show the Delaware Supreme Court through its members or agents instigated the ODC's proceedings against me which creates manifest prejudice against me, or at least appeared to instigate the ODC's proceedings against me, giving the appearance of lack of partiality, and the inability to grant me a fair trial in the above referenced matter.

In addition, the ODC brought the proceedings against me, unlawfully as applied, in violation of my protected rights under the First Amendment applicable to the ODC pursuant to the Fourteenth Amendment.

This Honorable Court lacks subject matter jurisdiction based on illegality of proceeding.

The Chancery Court lacked jurisdiction to enjoin the ODC since the facts arose in the Chancery and Delaware Supreme Courts, creating the appearance of lack of impartiality or actual partiality.

Thank you.

Very truly,

/s/Meghan Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
No Phone
meghankellyesq@yahoo.com
Bar Number 4968

CC: Office of Disciplinary Counsel Patricia B. Schwartz, by mail and E-mail
Administrative Assistant to the Board on Professional Responsibility by mail

Exhibit C part 2

Law library/21-1490

From: Meg Kelly (meghankellyesq@yahoo.com)

To: ryan.costa@delaware.gov; zi-xiang.shen@delaware.gov; david.weiss@usdoj.gov

Bcc: meghankellyesq@yahoo.com

Date: Wednesday, December 15, 2021, 04:49 PM EST

Good afternoon,

I hope you are safe and well.

I am concerned. The law librarian has access to PACER, allegedly for the DE Supreme Court. She said the Supreme Court gave them their password. When I called PACER from the law library concerning fees, the representative indicated the DE Courts do not use pacer and should not require pacer. Only the federal courts use it. Then, the law librarian started making up reasons why the DE Supreme Court paid for pacer. I think they intend to sue me in retaliation of the exercise of my First Amendment rights. I mentioned that on my exhibits, admissible as a presence sense impression should anything happen to me.

I think the DE Supreme Court seeks to take me out by demeaning my reputation.

I do not believe the same as others. I should not be punished for having different religious beliefs. Jesus teaches people go to hell if they allow their desires for security in money to control their life. I do not serve money. I choose God as master.

Do you see how our leaders are misled by money, by money they allowed the federal reserve and private entities to control by creating out of nothingness, and how the government sins by controlling people by money, penalties and profit, instead of safeguarding their freedom with just decrees? If you could persuade the Courts this is a violation of the 13th, you may prevent the planned crash. The government must govern, not be governed by money. The Government must take control of money to care for the people, and safeguard freedom.

I was tearing up when I wrote this without sending it. I am allowed to think differently, as an individual, and believe differently. Collectively, we are weaker by conformed conditionally thinking. Individually we are stronger together by offering diverse views to improve or adapt to situations. We must protect the freedom of the individual. Otherwise, none are free but forced to conform to the beliefs and thinking of whoever controls the conformed, conditioned group believing, making their will be done like Satan. Instead of laying down our will, our wants, and desires to care to think, care to know, care to love others and to even love ourselves.

Regardless as to what happens to me, there is a plan to crash the economy, to overthrow our government's power to govern, taken over by private partners. I need to help you understand. So maybe you can be the hero, no matter what happens to me. I thought about seeking a mistrial in my case against Trump/Biden, but I feel like crawling up into a ball just thinking about it. If that is the case, David Weiss you will be opposing counsel.

There is a plan to increase desperate conditions, to force folks out of their homes, for the government to take their real property, only for the property to be taken from the government to be controlled by the government's creditors. 47 percent of Americans are scheduled to be unemployed by 2026-27 to work as slaves, unpaid for government welfare in violation of the 13th amendment before more are slaves to a fiefdom system, not communism or capitalism, something much worse. See Attached from the book I previously sent you written in 2015. The book also talked about bio war viruses. When they talk about it, that means they plan on unleashing it. Gates is a partner in the world economic forum. You are Attorney Generals. You have the power and position to reverse or prevent an economic crash.

You must protect those you correct, even if you correct by guiding the President, courts and congress. You are the advocates who are charged to guide those misled by lawless vanities.

You may be my opponents in name only, as I hope you will be heroes to save not only the US, but the world.

It is pretty scary the DE Supreme Court got pacer to go after a peon like me. I do not feel safe. The democrats wanted to eliminate me per my exhibit to the complaint (Complaint against Democrats to run for office without violating my

religious beliefs) prior to the pandemic because I was not on board with their massive bad healthcare plan. It is so strange. I noticed misbehaving companies donated to both sides when I ran for office. Artesian gave to my former opponent Ron Gray and the Democrats in upper DE. It is the same on the federal level. Our leaders are dumb and blind, blinded by money and support. They do not see clearly or hear the sirens of danger ahead.

Did you see the UN's proposals? Clean energy done dirty is still dirty. They propose unjust laws, making the common man pay more so the common man uses less, creating less pollution at the cost of potential suffering and loss of liberty, making everything for sale, even the air we breathe. We will no longer be free to merely be alive.

The proposals of alleged clean deteriorating products cause pollution in the production of replaced products, and unnecessary expenses for the consumer, debt to control the consumers forced to buy replacement products, as opposed to made to last, made to work products.

I support cleaning and safeguarding the environment through just decrees I proposed long ago that lifts the burden off the back of the common man, not increasing the it like Biden and the UN's proposes do.

Notice, per the attached article, Janet Yellen wants to decrease help, as she increases interest rates which will increase folks' need for help. Janet Yellen is not our friend. She has a conflict of interest with the American people, and the interest of the US as former Chair of the Federal Reserve. She has also spoken at the BIS, Bank of International Settlements. Her former colleagues make more money the more debt, the worse off America and Americans and the world is.

Thank you for caring to read my thoughts. The plans are happening quicker than the book outlines. I was not expecting 47 percent of the population to be unemployed by design until 2026-2027, but it may happen sooner. Remember those who make money out of nothingness, the central banks, the BIS, the World Bank, even small banks gain control over people by the debt, not just profit. Poor China, indebted to the World Bank. We are not poor, though we are indebted to the World Bank and China, along with other entities. We can take back the coining power and coin out of nothingness without borrowing or paying interest like Presidents Lincoln and Kennedy proposed to fully pay back all of our debt. We could require banks lend out from their own reserves, to gamble with their own money, unbacked by the US. This will prevent inflation since they will be more careful. No longer will the tax payer fund bad business. The Fed should coin money to pay for their workers too, ensuring pensions will be honored. I have ideas to create a deflation too. So folks' dollars will go farther, but there is no hope of that if the World economic forum and their cohorts, including all of our Presidents, even former President Trump's daughter attended these. They all have dirty hands in need of court correction, not condemnation, to potentially save them too, by being made clean. The World Economic Founder outlines a lot of ways on eliminating freedom and controlling people in the 2015 book, even our clothes. Keep your old clothes. They want to make new clothes with sensors to control people, not to help them, under the guise of helping them.

The entire world is in danger. I hope you choose to be the heroes we need.

Love and thanks,

Meg



2015 book concerns 4th industrial rev.pdf
552.7kB



Art increase rates while decrease help spells disaster.pdf
192.1kB

Exhibit D

Certificate of service Dec 21, to Board No 115327 B

From: Meg Kelly (meghankellyesq@yahoo.com)
To: karlis.johnson@delaware.gov
Cc: patricia.schwartz@delaware.gov; meghankellyesq@yahoo.com
Date: Thursday, December 23, 2021, 11:18 AM EST

Good morning,

Attached, please find the certificate of service I filed with you on December 21, 2021.

Thank you,
Meg



Cert of service sent a day late board.pdf
54.1kB

THE SUPREME COURT OF THE STATE OF DELAWARE

In the Matter of a Member of the Bar of the Supreme Court of the state of Delaware
Meghan M. Kelly, respondent.

) Misc 541
) Board Case No. 115327-B
)
)

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

I, Meghan M. Kelly, Esquire, hereby certify that on the 21st day of December, 2021, I had a true and correct copy of 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, sent to, served via first class mail:

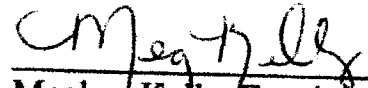
Administrative Assistant to the Board on Professional Responsibility
The Renaissance Center
405 N. King Street, Suite 505
Wilmington, DE 19801,

and a copy of this certificate of service, served via first class mail to:

Disciplinary Counsel Patricia B. Swartz
405 N. King Steet, Suite 420
Wilmington, DE 19801

Respectfully submitted,

Dated December 21, 2021



Meghan Kelly, Esquire
DE Bar Number 4968
34012 Shawnee Drive
Dagsboro, DE 19939

meghankellyesq@yahoo.com

No phone

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

Meghan Kelly (printed)

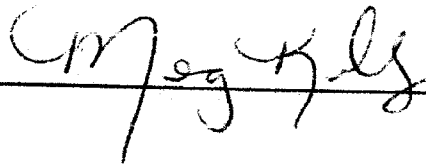
 (signed)

Exhibit E

Fw: Object to such appointment/object to service by email on Aug 23, and future service, to be met on date of official service per the rules

From: Meg Kelly (meghankellyesq@yahoo.com)

To: dhutt@morrisjames.com

Cc: meghankellyesq@yahoo.com

Date: Friday, December 17, 2021, 03:32 PM EST

I copied family and loved ones in case it is not well with me.

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

From: Meg Kelly <meghankellyesq@yahoo.com>

To: Schwartz, Patricia (Courts) <Patricia.Schwartz@delaware.gov>

Cc: Meg Kelly <meghankellyesq@yahoo.com>; Matthew <matthewkosiorek@comcast.net>; Mark Vavala <mvavala@dsba.org>; E. Mark Braden Esq. <mbraden@bakerlaw.com>; Darin McCann <darin.mccann@coastalpoint.com>; Glenn Rolphe <grolfe@newszap.com>; Mary Mastrogiacommo <marykmastro@gmail.com>; Tim Mastrogiacommo <tmastro@gmail.com>; Ike Adams <iadams@sidley.com>; Aggie Kelly <aggiekelly@comcast.net>; Mckayla Braden <mckayla.braden@gmail.com>; Chris Calio <chris.calio@yahoo.com>; Jeff Day <jday1632@gmail.com>; Chris Johnson <christopher.johnson@gmail.com>; Greg Layton <misphillionink@gmail.com>

Sent: Thursday, November 4, 2021, 02:25:25 PM EDT

Subject: Object to such appointment/object to service by email on Aug 23, and future service, to be met on date of official service per the rules

Dear Ms. Swartz,

The rules require service by certified mail and or personal service. I do not waive the date of service as required by the rules upon proper service. Please note, I did not receive a paper copy by US mail or otherwise of the August 23, 2021 letter.

Do not appoint counsel. I object to such appointment. I do not waive the right to represent myself, and will not pay any fees for such representation. I object to such appointment as insulting, harassing, humiliating and causing other harm for the suggestion of such appointment and proceedings. I object on due process and other grounds, including but not limited to violations of my First amendment protected exercise of religion, speech, association, and petitioning, applicable to Defendants pursuant to the fourteenth amendment.

Poverty is not a disability. Increasing my poverty by adding to fees for the appointment of counsel, and violating my religious beliefs by appointing counsel, since my advocate is God, through the holy spirit, not man. I will stand and fall on my religious faith, no matter how much you increase the temptation for me to violate my faith by increased pressures.

My religious belief in Jesus Christ is not a disability. I also object on the lawless grounds upon which this proceeding was brought in violation of 42 USC sections 1985(2) and 1983.

I object to any and all fees and specifically object to representation fees as insulting, harassing and demeaning to bend your will based on profit at the elimination of my individual liberties.

I have a fundamental right to represent myself. You cannot take that away for your own convenience at the prospect of working with indigent, pro se parties.

Regards,
Meg

On Thursday, November 4, 2021, 02:06:01 PM EDT, Schwartz, Patricia (Courts) <patricia.schwartz@delaware.gov> wrote:

Ms. Kelly

The PRC met yesterday and approved the filing of the Petition to Transfer to Disability Inactive with the Board on Professional Responsibility. The ODC will serve a copy of the petition on you at the address on record with the Supreme Court and by email.

Pursuant to Procedural Rule 19(c) if you are not represented by counsel, the Court shall appoint counsel to represent you. If you are represented by counsel, please have counsel contact me at this email address. If I do not hear from your counsel by 5:00 pm Monday November 8, 2021, I will assume you are not represented and will notify the Court as such.

Patty Schwartz

Patricia Bartley Schwartz
Office of Disciplinary Counsel
Supreme Court of Delaware
405 N. King Street, Suite 420
Wilmington, DE 19806
Temporary number 302-668-3467
[for iOS](#)

From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Wednesday, November 3, 2021 9:01:59 PM
To: Schwartz, Patricia (Courts) <Patricia.Schwartz@delaware.gov>
Cc: Matthew <matthewkosiorek@comcast.net>; Mckayla Braden <mckayla.braden@gmail.com>; E. Mark Braden Esq. <mbraden@bakerlaw.com>; Ike Adams <iadams@sidley.com>; Tim Mastrogiacomo <tmastro@gmail.com>; Aggie Kelly <aggiekelly@comcast.net>; Glenn Rolphe <grolfe@newszap.com>; Darin McCann <darin.mccann@coastalpoint.com>
Subject: Re: November 3 meeting

My apologies for the typo, and so I will defer to your counsel.

On Wednesday, November 3, 2021, 09:59:28 PM EDT, Meg Kelly <meghankellyesq@yahoo.com> wrote:

Good evening,

Could you please let me know the determination of the November 3, 2021 proceeding? Additionally, could you please let me know whether you provided my response during the proceeding, as I opposed the proceedings conducted in interference and in retaliation of the exercise of my first amendment rights applicable to you pursuant to the Fourteenth Amendment, and in violation of 42 Sections 1985(2) and 1983?

Your counsel indicated I could talk with you regarding your wrongful action against me by bringing a proceeding against me for my belief in Jesus, and exercise of other First amendment rights. Your counsel properly instructed me not to correspond to you about the federal case, and so I will.

Thank you,
Meg

Exhibit F

Board Case 115327B/Docket-BS'ing appointed counsel fear tactic

From: Meg Kelly (meghankellyesq@yahoo.com)
To: patricia.schwartz@delaware.gov
Cc: meghankellyesq@yahoo.com
Date: Wednesday, December 22, 2021, 06:53 PM EST

Patricia,

The appointed counsel didn't appear to know what he was doing. He used fear as a marketing tactic and was behaving like I was forced to have counsel, not having a say, an opportunity of notice and at least a hearing regarding forced violation of my first amendment beliefs, particularly my religious beliefs, and 6th Amendment right, which should be construed similar to the right of those accused of crimes.

I guess I fell for his bull shit and filed a motion I probably did not need to file upon declining his representation.

If you read my motion, you will see appointed counsel violates my religious beliefs. Government agents including you are required to respect not force compelled violations of religious exercise. I desire mercy, if you honor my wishes I will make note of it in my filings, but it is not okay for the DE Supreme Court to behave above the law, above the Constitution.

David Hutt is slimy. An examination of the Docket would allow me to see how counsel was assigned.

I hope you have a good night. I desire nominal damages to protect freedom from being for sale. It is not too late to withdraw this case to choose to uphold the Constitution as opposed to destroy the constitution by making a mockery of the court by making it a market instead of a service to the public requiring PR. Justice is not a matter of popularity or praise from the public. It is a matter of doing the right thing, guiding the misguided with mercy, transforming wrongdoers and to right doers, saving lives and eternal lives, not exploiting need to serve greed.

Justice is not a matter of making money. Justice is not for sale.

Best regards,
Meg

On an aside, the law librarian said no to helping me scan exhibits. If a court requires her to help me. That would help you too by saving you time scanning. I apologize that I do not have everything scanned. Del Tech will not allow me to use their scanner either.

Exhibit G

To Court and Board and Counsel David Rutt Fired never accepted/Fw: Reject Counsel Misc 541/115327-B9

From: Meg Kelly (meghankellyesq@yahoo.com)

To: lisa.dolph@delaware.gov

Cc: dhutt@morrisjames.com; meghankellyesq@yahoo.com; patricia.schwartz@delaware.gov; mason.vannucci@delaware.gov; david.weiss@usdoj.gov

Date: Tuesday, December 21, 2021, 10:23 PM EST

Good evening,

David Hutt does not represent me. I declined representation, per the attached.

Please direct all communications to me. Lisa, I asked you for a docket yesterday, and you indicated there was not anything new I needed to see. Please send me the docket, and I require a docket from the board too. I made a request with Mason yesterday evening. I also filed something with the Board to postpone any hearing until a determination is made concerning counsel. I want to see the documents on how he was appointed without my consent and despite my objection. I moved via letter to the Board. I needed to perform discovery, and the court is aware of my intent to file a motion to dismiss on subject matter grounds.

I am entitled for a fair opportunity to be heard regarding persecution against me by government agents relating to fundamental matters including my belief in Jesus Christ the Office of Disciplinary Counsel finds illogical.

Thank you for your attention to this important matter.

Meg.

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

From: Meg Kelly <meghankellyesq@yahoo.com>
To: David C. Hutt <dhutt@morrisjames.com>
Cc: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Tuesday, December 21, 2021, 09:17:43 PM EST
Subject: Reject Counsel Misc 541/115327-B9

David,

Attached please find the letter mailed out to the Board, ODC and the Supreme Court today. You do not represent me. Please accept my wishes by forwarding this to the DE Supreme Court should they wrongly reject the letter sent today.

Thank you,
Meg



Cert of serv sent Dec 21.pdf
38.5kB



Letter representation rejected.pdf
105kB

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939

Office of the Clerk

RE: Client declined services/*ODC v Meghan Kelly, Misc 541, Board Case No. 115327-B

December 21, 2021

Dear Clerk:

On Monday December 20, 2021, I filed a motion for reconsideration of the Order dated December 13, 2021 appointing counsel, despite my objection.

I assumed counsel made an appearance since delivery of the Board's notice of hearing was sent to him instead of me. It was inappropriate for the Board or the petitioner to send him notice instead of me. Acceptance of representation had not been made, and petitioner and this Court had notice of my objection to the appointment of counsel.

After I filed the motion, I called Lisa Dolph of the Delaware Supreme Court from the law library to determine whether an appearance had been made. She kindly granted me great relief and said there was no appearance made by counsel.

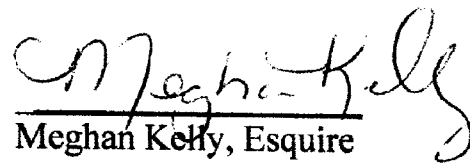
I immediately emailed appointed counsel, the letter indicating, "I decline representation. Your services are not accepted." He confirmed receipt per the attached.

I respectfully request the court honors my wishes to represent myself preventing the need to brief the issues.

Thank you for your consideration of these important matters. I hope you stay safe and well.

Very truly,

Dated December 21, 2021



Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
No Phone
meghankellyesq@yahoo.com
Bar Number 4968
(Word Count 875)

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

Dated: December , 2021

Meghan Kelly (printed)

Meghan Kelly (signed)

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939

**Clerk of the Supreme Court
55 The Green
Dover, DE 19901**

**RE: ODC Board Case No. 115327-B (Meghan M. Kelly, Esquire),
Representation is not accepted**


December 20, 2021

Dear David Hutt, Esquire:

I decline representation. Your services are not accepted.

Thank you.

Very truly,


Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
No Phone
meghankellyesq@yahoo.com
Bar Number 4968

RE: Board Case No. 115327-B/

From: Hutt, David C. (dhutt@morrisjames.com)

To: meghankellyesq@yahoo.com

Date: Monday, December 20, 2021, 06:03 PM EST

Received. Thank you.

Morris James_{LLP}

David C. Hutt | Partner

107 W. Market Street, P.O. Box 690, Georgetown, DE 19947

19339 Coastal Highway, Suite 300, Rehoboth Beach, DE 19971

Phone: 302.856.0018 | Fax: 302.856.7217

morrisjames.com | dhutt@morrisjames.com

Facebook | LinkedIn | Twitter

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From: Meg Kelly <meghankellyesq@yahoo.com>

Sent: Monday, December 20, 2021 3:42 PM

To: Hutt, David C. <DHutt@morrisjames.com>

Cc: Meg Kelly <meghankellyesq@yahoo.com>

Subject: Board Case No. 115327-B/

Good afternoon,

Thank you for the message.

Please see attached.

Best regards,

Meg

Exhibit H

No counsel Fw: In the Matter of A Member of the Bar of the Supreme Court of the State of Delaware: Meghan M. Kelly, Misc. No. 541

From: Meg Kelly (meghankellyesq@yahoo.com)
To: lisa.dolph@delaware.gov
Cc: meghankellyesq@yahoo.com; patricia.schwartz@delaware.gov
Date: Wednesday, December 22, 2021, 05:48 PM EST

Hi Lisa,

I think you mistakenly thought I was represented by counsel. Per the attached, sent to you via mail, and the below email David Hutt agreed to respect my wishes.

In light of this, please put the motion on record, should any issues arise. Please note, the attached letter indicates briefing may not be required. It is seemingly moot but should be on the record.

Thank you,
Meg

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

From: Meg Kelly <meghankellyesq@yahoo.com>
To: David C. Hutt <dhutt@morrisjames.com>
Cc: Meg Kelly <meghankellyesq@yahoo.com>; Chris Calio <chris.calio@yahoo.com>; Chris Johnson <christopher.johnson@gmail.com>; Darin McCann <darin.mccann@coastalpoint.com>; Matthew <matthewkosiorek@comcast.net>; Glenn Rolphe <grolfe@newszap.com>; Cris Barrish <cbarrish@why.org>; Liz Sillick <sillickliz@gmail.com>; Ike Adams <iadams@sidley.com>; E. Mark Braden Esq. <mbraden@bakerlaw.com>; Tim Mastrogiacomo <tmastro@gmail.com>; Aggie Kelly <aggiekelly@comcast.net>; dad <coachkellyirhs@yahoo.com>; Mary Kelly <mbkpade@yaho.com>; Mary Mastrogiacomo <marykmastro@gmail.com>; Cris Barrish <cbarrish@comcast.net>; Andy <andykelly@diveintoflood.com>; Amanda Gordines <mandygordines@yahoo.com>; Schwartz Patricia (Courts) <patricia.schwartz@delaware.gov>; Mckayla Braden <mckayla.braden@gmail.com>; Greg Layton <mispillionink@gmail.com>; Jeff Day <jday1632@gmail.com>; Chris Coons <andrew_crawford@judiciary-dem.senate.gov>; christie.mcdonnell@mcdonnelllawfirm.com <christie.mcdonnell@mcdonnelllawfirm.com>
Sent: Wednesday, December 22, 2021, 10:23:16 AM EST
Subject: Fw: In the Matter of A Member of the Bar of the Supreme Court of the State of Delaware: Meghan M. Kelly, Misc. No. 541

You are fired. I declined your representation. My poverty and my belief in Jesus Christ does not make me disabled. I already declined your representation. I am copying people for my safety.

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

From: Hutt, David C. <dhutt@morrisjames.com>
To: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Wednesday, December 22, 2021, 09:11:27 AM EST
Subject: RE: In the Matter of A Member of the Bar of the Supreme Court of the State of Delaware: Meghan M. Kelly, Misc. No. 541

Meg,

I do not believe that a person appointed by the Court in an ODC matter is required to also file an entry an appearance on behalf of the person they represent. The Court appointed them so there would be no need to also enter an appearance on behalf of the person being represented.

I reviewed your recent submissions to the Supreme Court.

I continue to believe that you would benefit from being represented by counsel in these proceedings. While I understand your position and strategy on the merits of this matter, I think there are additional or other strategies that you should consider or explore that may benefit you as you seek to maintain your license to practice law. I am happy to undertake those discussions with you.

That said, if your position remains that you would like to submit your motion requesting to remove me as your counsel, then I will do so.

I caution you in two respects and offer a further word of advice.

First, there is an age old adage, that he who represents himself has a fool for a client. Adages are what they are, but there is often at least a bit of wisdom in them.

Second, I'm not sure you can decline representation because, as I indicated previously, the declination of representation assumes that the person declining representation has the capacity to make a knowing, voluntary and informed decision.

Finally, if you haven't done so already, please consider speaking with a pastor, spiritual advisor or other counselor about your present course. It is always a good idea to consult with others and find out their thoughts on your view of defending oneself in a Court-like proceeding. I know several such pastors and advisors and would be happy to put you in contact with one of them.

Thanks,

David

From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Tuesday, December 21, 2021 8:42 PM
To: Hutt, David C. <DHutt@morrisjames.com>
Cc: Meg Kelly <meghankellyesq@yahoo.com>
Subject: Re: In the Matter of A Member of the Bar of the Supreme Court of the State of Delaware: Meghan M. Kelly, Misc. No. 541

David,

I declined your representation. You are fired in this matter, through no fault of your own.

They have not received the attached letter where I declined your services.

I need a docket of the Board matter. I have a right to the docket and need it for my lawsuit to enjoin the proceeding in federal court. I contacted the Board and made a request via email yesterday.

Do not make an appearance. What action if any have you taken in this case that I may not be aware of?

Thank you.

Meg

On Tuesday, December 21, 2021, 06:11:54 PM EST, Hutt, David C. <dhutt@morrisjames.com> wrote:

Meg,

Please see the email below and attached letters that I received from the Clerk of the Supreme Court this afternoon.

You will see that the Court rejected the document filed on Monday with the explanation set forth in the attached letter.

As you know, I am still relatively new to this matter and am working through the documents given to me by the Supreme Court, which appear to be ODC's Complaint and your Answer.

When I complete that review, I will let you know my thoughts on the best response and defenses.

Thanks,

David

Morris James LLP

David C. Hutt | Partner
107 W. Market Street, P.O. Box 690, Georgetown, DE 19947
19339 Coastal Highway, Suite 300, Rehoboth Beach, DE 19971
Phone: 302.856.0018 | **Fax:** 302.856.7217
morrisjames.com | dhutt@morrisjames.com

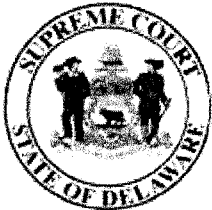
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From: Dolph, Lisa (Courts) <Lisa.Dolph@delaware.gov>
Sent: Tuesday, December 21, 2021 1:59 PM
To: Hutt, David C. <DHutt@morrisjames.com>; Schwartz, Patricia (Courts) <Patricia.Schwartz@delaware.gov>
Subject: In the Matter of A Member of the Bar of the Supreme Court of the State of Delaware: Meghan M. Kelly, Misc. No. 541

Good afternoon. Please see the attached. Thank you.

Lisa A. Dolph
Clerk of Supreme Court
55 The Green
Dover, DE 19901
(302) 739-4187



 Cert of serv sent Dec 21.pdf
38.5kB


 Letter representation rejected.pdf
105kB

Exhibit I

Misc 541/ State v Kelly/ Receipt of Docket/Incomplete filing prejudicial

From: Meg Kelly (meghankellyesq@yahoo.com)
To: lisa.dolph@delaware.gov; patricia.schwartz@delaware.gov
Cc: meghankellyesq@yahoo.com
Date: Monday, December 27, 2021, 11:49 AM EST

Hi Lisa,

Thank you for the attached docket received, December 24, 2021. I see Number 6 is "Respondent's Motion for Reconsideration of Order and proposed Order. I note there is a 6 on top of the items as if the Court itself seeks a case against me.

David Hutt didn't appear to have all the documents I filed on 12/20/2021. Attached, please find what David Hutt appeared to receive. Could you please upload all the exhibits as it is prejudicial to exclude the exhibits and context of the assertions in the motion.

Thank you,
Meg
Meghan Kelly
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com



Received Dec 24 Docket of DE Supreme Court.pdf
30.8kB



#6 Motion to reconsider by Meghan Kelly (4).pdf
674.2kB

MISC 541 IN THE MATTER OF A MEMBER OF THE BAR OF THE SUPREME COURT OF THE STATE OF DELAWARE: MEGHAN M. KELLY

1. 11-18-21 Letter dated 11-18-21 from Patricia Bartley Schwartz, Esquire to Clerk, requesting the Court appoint counsel for Ms. Kelly in connection with the Petition to Transfer to Disability Inactive. (ead)
2. 11-22-21 Letter dated 11-22-21 from Meghan Kelly, Esquire to Clerk, advising that she intends to object to the ODC's request for appointment of counsel on religious grounds. (ead)
3. 11-23-21 Letter dated 11-23-21 from Meghan Kelly, Esquire to Clerk further stating her intention to file objections to the ODC's request. (ead)
4. 12-2-21 Letter dated 12-1-21 from Meghan Kelly, Esquire, regarding her correspondence with ODC.
5. 12-13-21 Order dated 12-13-21 by Vaughn, J., David C. Hutt, Esquire is appointed to represent Meghan M. Kelly. (ead)
6. 12-20-21 Respondent's Motion for Reconsideration of Order and proposed Order. (ead)
7. 12-21-21 Letter dated 12-21-21 from Clerk to counsel, forwarding Ms. Kelly's document for appropriate disposition. (mailed to M.Kelly along with docket sheet.) (ead)

*received
12/24*

Exhibit J

Thank you Lisa/ Attached motion for reargument and exhibits last week/ Meghan M. Kelly, Misc. No. 541

From: Meg Kelly (meghankellyesq@yahoo.com)

To: lisa.dolph@delaware.gov; patricia.schwartz@delaware.gov; meghankellyesq@yahoo.com

Date: Tuesday, December 28, 2021, 01:38 PM EST

Hi Lisa,

Thank you so much for taking time to talk with me, and for kindly confirming I have nothing to worry about concerning the name of the document which included the number 6.

To confirm, I did not give David Hutt my Motion for reargument. At no time did I accept representation. He incorrectly made it sound like I had no choice. There is always a choice.

What David Hutt included in the attached allegedly rejected Motion for reargument is not the complete filing with exhibits. Your docket included my motion.

Thank you for confirming the Court has the exhibits, physically in a folder, and to you via email. Should I need to appeal, and this action is not dismissed, I may cite the exhibits.

To confirm, the 4 part email I sent you last week included attachments of the Motion for reargument, and related documents and exhibits

Please feel free to correct me if I am not understanding correctly.

Thank you. Additionally, thank you for ordering a new bar card. Have a good day.

Very truly,
Meg Kelly
340132 Shawnee Drive
Dagsboro, DE 19939
4968
meghankellyesq@yahoo.com

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

From: Hutt, David C. <dhutt@morrisjames.com>

To: Meg Kelly <meghankellyesq@yahoo.com>

Sent: Tuesday, December 21, 2021, 06:11:54 PM EST

Subject: FW: In the Matter of A Member of the Bar of the Supreme Court of the State of Delaware: Meghan M. Kelly, Misc. No. 541

Meg,

Please see the email below and attached letters that I received from the Clerk of the Supreme Court this afternoon.

You will see that the Court rejected the document filed on Monday with the explanation set forth in the attached letter.

As you know, I am still relatively new to this matter and am working through the documents given to me by the Supreme Court, which appear to be ODC's Complaint and your Answer.

When I complete that review, I will let you know my thoughts on the best response and defenses.

Thanks,

David

Morris James_{LLP}

David C. Hutt | Partner

107 W. Market Street, P.O. Box 690, Georgetown, DE 19947

19339 Coastal Highway, Suite 300, Rehoboth Beach, DE 19971

Phone: 302.856.0018 | Fax: 302.856.7217

morrisjames.com | dhutt@morrisjames.com

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From: Dolph, Lisa (Courts) <Lisa.Dolph@delaware.gov>

Sent: Tuesday, December 21, 2021 1:59 PM

To: Hutt, David C. <DHutt@morrisjames.com>; Schwartz, Patricia (Courts) <Patricia.Schwartz@delaware.gov>

Subject: In the Matter of A Member of the Bar of the Supreme Court of the State of Delaware: Meghan M. Kelly, Misc. No. 541

Good afternoon. Please see the attached. Thank you.

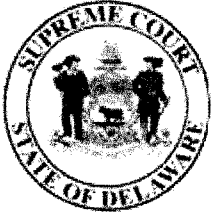
Lisa A. Dolph

Clerk of Supreme Court

55 The Green

Dover, DE 19901

(302) 739-4187



Misc 541 letter to Hutt.pdf
11.5kB



#6 Motion to reconsider by Meghan Kelly.pdf
674.2kB

Exhibit K

to Supreme Court Clerk/Misc 541/Fw: Part 1 of 4 emails Motion for reconsideration Bd 115327B

From: Meg Kelly (meghankellyesq@yahoo.com)
To: lisa.dolph@delaware.gov
Cc: patricia.schwartz@delaware.gov; meghankellyesq@yahoo.com
Date: Thursday, December 23, 2021, 03:52 PM EST

Hi Lisa,

David Hutt did not receive the motion the court rejected in toto. So, he only attached what was provided to him in his recent filing.

I am sending the documents in toto, and copying opposing counsel. Though this may be moot, should the Court honor my religious beliefs by allowing me to remain unrepresented by counsel, I would appreciate if the complete motion with exhibits was filed, despite it being rendered moot. David Hutt included the motion without the exhibits for the court's review. The exhibits illustrate examples of government sponsored violations of religious beliefs.

I need time for discovery, and will work with opposing counsel, potentially even providing her with drafts before I formally serve her. I also intend to object to the examination by mental and health experts at the hearing and will have to file a motion on grounds relating to my religious beliefs. I will work with opposing counsel. I also intend to file a protective order relating to exams as against my religious beliefs. After discovery is conducted, armed with more concrete facts, I intend to file a motion to dismiss for lack of subject matter. I am backed up now, and I saw Patricia took off her auto response from vacation, "to return January 3, 2021." So, we will need time to determine truth.

I hope you and your loved ones stay healthy and safe. My parents who live in Florida recovered from Covid 19. They were fully vaccinated. Viruses stay in your body forever. This virus will likely resurface and reinfect those who caught it mutating to different strains. My parents and other loved ones will probably get sick again as the latent virus resurfaces. I mask and glove up everywhere. It is a sad time where the world is losing so many, regardless of their stance and medical beliefs. They are the treasure. Money and material things are moth and rust.

Thank you,
Meghan Kelly
Bar No 4968
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com

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

From: Meg Kelly <meghankellyesq@yahoo.com>
To: karlis.johnson@delaware.gov <karlis.johnson@delaware.gov>
Cc: Meg Kelly <meghankellyesq@yahoo.com>; Schwartz Patricia (Courts) <patricia.schwartz@delaware.gov>
Sent: Thursday, December 23, 2021, 01:28:34 PM EST
Subject: Part 1 of 4 emails Motion for reconsideration Bd 115327B

Good afternoon,

Attached, please find the copy of the motion *Meghan M. 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*, along with other documents I filed with you on December 21, 2021, via first class mail.








In this email also find

1. The certificate of service of the motion and related documents,
2. Exhibit 1, the Delaware Supreme Court Order relating to Counsel,

3. Exhibit 2 Letter from Appointed Counsel and Notice of a hearing
4. Exhibit 4 Email to appointed counsel after I declined forced representation concerning another idea for the court to entertain.
5. Exhibit 4 Five Articles of Impeachment I proposed and contacted all 541 federal law makers about

I will send you the additional documents in separate emails. Discovery will be necessary. The fired appointed counsel has not handed over documents you provided him with.

Thank you,
Meghan Kelly
Bar 4968
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com

-  Filed motion reargument.pdf
237.8kB
-  certificate of service of motion for reconsideration.pdf
53.3kB
-  Ex 1 Order appt atty.pdf
27.5kB
-  Ex 2 Order atty app notice.pdf
86.4kB
-  Ex 3 Notice object to counsel to atty, Bd and Pet..pdf
179kB
-  Ex 4 4 part 1 of 2.pdf
142.8kB
-  Ex 4 part 2 of 2 attached Ex 7 five art of impeachment.pdf
3.9MB

Fw: Part 2 of 4 emails Motion for reconsideration Bd 115327B/

From: Meg Kelly (meghankellyesq@yahoo.com)
To: lisa.dolph@delaware.gov
Cc: patricia.schwartz@delaware.gov; meghankellyesq@yahoo.com
Date: Thursday, December 23, 2021, 03:54 PM EST

Hi Lisa,

Please see attached.

Thank you,
Meghan Kelly
Bar No. 4968
34012 Shawnee
Drive Dagsboro, DE 19939
meghankellyesq@yahoo.com

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

From: Meg Kelly <meghankellyesq@yahoo.com>
To: karlis.johnson@delaware.gov <karlis.johnson@delaware.gov>
Cc: Meg Kelly <meghankellyesq@yahoo.com>; Schwartz Patricia (Courts) <patricia.schwartz@delaware.gov>
Sent: Thursday, December 23, 2021, 01:28:42 PM EST
Subject: Part 2 of 4 emails Motion for reconsideration Bd 115327B/

Good afternoon,

Attached, please find the copy of part 2 of the documents I filed with you on December 21, 2021 via first class mail.

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. (I was not able to scan in the exhibit with a cover page. Sorry. The law librarians are out in Kent and Sussex today)

Exhibit 6 Email to Attorney Generals regarding DE Supreme Court concerns, and religious beliefs

Within Exhibit 6 are exhibits I forwarded to the Attorney General including,

- 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 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.

Thank you,
Meghan Kelly
Bar No. 4968
34012 Shawnee

Drive Dagsboro, DE 19939
meghankellyesq@yahoo.com



Exhibit 5 Motion for Permission to Appeal in Forma Pauperis.pdf
3.9MB



Exhibit 6 present sense fear of Sup Ct pacer yipes.pdf
171.9kB



Exhibit 2 to Appendix F complaint against democrats (1).pdf
2.7MB



Exhibit 3 to App F Email to Court regarding swearing violates Jesus s teachings.pdf
108.8kB



Exhibit 4 to Appendix F Family law violates Jesus s teachings.pdf
109.3kB



Exhibit 6 to App F Email for Senator Tom Carper Use of Religion for vanity to serve war money not good.pdf
118.3kB



Exhibit 8 to Appendix F Proposal to prevent oil drilling (1).pdf
179.8kB

Fw: Part 3 of 4 emails Motion for reconsideration Bd 115327B/

From: Meg Kelly (meghankellyesq@yahoo.com)
To: lisa.dolph@delaware.gov
Cc: meghankellyesq@yahoo.com; patricia.schwartz@delaware.gov
Date: Thursday, December 23, 2021, 03:56 PM EST

Hi Lisa,

Please see attached.

Thank you,
Meghan Kelly
Bar No. 4968
34012 Shawnee
Drive Dagsboro, DE 19939
meghankellyesq@yahoo.com

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

From: Meg Kelly <meghankellyesq@yahoo.com>
To: karlis.johnson@delaware.gov <karlis.johnson@delaware.gov>
Cc: Meg Kelly <meghankellyesq@yahoo.com>; Schwartz Patricia (Courts) <patricia.schwartz@delaware.gov>
Sent: Thursday, December 23, 2021, 01:28:50 PM EST
Subject: Part 3 of 4 emails Motion for reconsideration Bd 115327B/

Good afternoon,

Attached, please find the copy of part 3 of the documents I filed with you on December 21, 2021 via first class mail.


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.

Thank you,
Meghan Kelly
Bar 4968
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com

 Exhibit 6 present sense fear of Sup Ct pacer yipes.pdf

171.9kB



Exhibit 7 DE Sup Ct Pacer concerns.pdf

168.4kB



Exhibit 8 Concerns about judges exhibiting prejudice and partiality.pdf

85.8kB



Exhibit 9 ltr to DE Sup Ct intent to object to appt atty.pdf

25.8kB



Exhibit 10 email to hopeful employer.pdf

48.6kB



letter digital cd dec 20 with motion reargum cert of ser plus.pdf

118.5kB

Fw: Part 4 of 4 Part 2 of 4 emails Motion for reconsideration Bd 115327B/

From: Meg Kelly (meghankellyesq@yahoo.com)
To: lisa.dolph@delaware.gov
Cc: patricia.schwartz@delaware.gov; meghankellyesq@yahoo.com
Date: Thursday, December 23, 2021, 03:57 PM EST

Hi Lisa,

Please see attached.

Thank you,
Meghan Kelly
Bar No. 4968
34012 Shawnee
Drive Dagsboro, DE 19939
meghankellyesq@yahoo.com

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

From: Meg Kelly <meghankellyesq@yahoo.com>
To: "karlis.johnson@delaware.gov" <karlis.johnson@delaware.gov>
Cc: Meg Kelly <meghankellyesq@yahoo.com>; Schwartz Patricia (Courts) <patricia.schwartz@delaware.gov>
Sent: Thursday, December 23, 2021, 02:29:23 PM EST
Subject: Part 4 of 4 Part 2 of 4 emails Motion for reconsideration Bd 115327B/

Good afternoon,

Attached, please find the copy of part 4 of the documents I filed with you on December 21, 2021, via first class mail.

Have a good day. Feel free to contact me via email should you have any questions.

Best regards,
Meghan Kelly
Bar 4968
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com







-  Cert of serv of Motion for reconsideration.pdf
51kB
-  Cert of Service of letter relating to Motion and CD served on DE Sup Ct.pdf
46.7kB
-  Dec 20 Cert of Type face and Volume.pdf
54.5kB
-  Dec 20 ltrr Digital data CD.pdf
100.1kB
-  Dec 21 Cert of serv Motion of reconsideration.pdf
54kB
-  Proposed Order Motion for reargument.pdf

Exhibit L

Fw: Board 11537 B/Hearing must be postponed in the interest of justice/

From: Meg Kelly (meghankellyesq@yahoo.com)

To: lisa.dolph@delaware.gov

Cc: patricia.schwartz@delaware.gov

Date: Tuesday, December 28, 2021, 05:11 PM EST

Hi Lisa,

I found Karlis's number available on a court document online.

Thank you,
Meg

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

From: Meg Kelly <meghankellyesq@yahoo.com>

To: Schwartz Patricia (Courts) <patricia.schwartz@delaware.gov>

Cc: Meg Kelly <meghankellyesq@yahoo.com>; Johnson Karlis P (Courts) <karlis.johnson@delaware.gov>

Sent: Tuesday, December 28, 2021, 03:53:16 PM EST

Subject: Board 11537 B/Hearing must be postponed in the interest of justice/

Hi Patricia,

I made two attempts to call Karlis Johnson from the law library to confirm receipt of the emails, and to clarify any confusion.

I am copying her on this email relating to this urgent matter since the hearing is scheduled in about two weeks.

Appointed Counsel noted in his letter he could not make the January 13, 2021 hearing date. I did not accept appointed counsel's representation. I fired him when he refused my declination of the offer, to make it clear I do not choose to accept his assistance on standby or otherwise.

On December 18, 2021, I mailed the Board a letter motion requesting we postpone a hearing date until 1. the DE Supreme Court makes a determination on counsel and 2. discovery is complete.

I want to confirm the Board received my letter motion to postpone the hearing, and to allow you an opportunity to respond. I have confirmation of receipt I previously emailed you. The hearing must be postponed in the interest of justice. So, I may perform discovery to defend the exercise of Constitutionally protected activity.

Thank you for your time and attention to this important matter. Have a good day.

Very truly,
Meghan Kelly
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
4968

Exhibit K

Re: Status of motion to postpone hearing/ Motion postpone/Bd 11537 B

From: Meg Kelly (meghankellyesq@yahoo.com)
To: patricia.schwartz@delaware.gov; karlis.johnson@delaware.gov
Cc: meghankellyesq@yahoo.com
Date: Thursday, January 6, 2022, 11:56 AM EST

I apologize, the letter dated December 18, 2021, is attached hereto. I hope you and your loved ones are well. I believe masks and gloves work. I think the flappers in the 1920s wore glamorous gloves to prevent the Spanish flu and other germs, not to flatter. I think it prudent if we adorn gloves too.

Have a safe and healthy afternoon.


Very truly,
Meg


On Thursday, January 6, 2022, 11:50:53 AM EST, Meg Kelly <meghankellyesq@yahoo.com> wrote:


Good afternoon,

I am following up on the status of the attached letter, which should be construed as a motion to postpone the hearing scheduled for one week from today, to afford a full and fair trial, including an opportunity to gather evidence, so as not to violate the substantive and due process clause, and an opportunity to use the evidence to present motions, including a motion to dismiss based on subject matter grounds.

Thank you,
Meg
Meghan Kelly
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
4968

 Dec 18 lttr counsel discovery appeal time.pdf
207.7kB

 Cert of service mailing Dec letter motion.pdf
52.2kB

 confirmation of receipt.pdf
119.5kB

U.S. DISTRICT COURT, DISTRICT OF DELAWARE

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

FILED
 U.S. DISTRICT COURT
 DISTRICT OF DELAWARE
 2022 JAN 19 AM 10:11

**PLAINTIFF MEGHAN M. KELLY’S 3rd EMERGENCY MOTION
 PURSUANT TO FRCP R. 52(b), 59 (e), 60(b)(1)(2)(6), and 65**

AND NOW this 1/19/22, respondent, Meghan M. Kelly, pro se, files emergency motion to pursuant to FRCP R. 52(b), 59 (e), 60(b)(1)(2)(6) and 65 moves this Court to alter and amend the judgment of the Court in its 12/22/21 order to (1) include the availability of new evidence not available previously available, and to later the order (2) to correct a clear error of law, (3) clear error of fact, (4) and to prevent manifest injustice.

1. Since yesterday, January 18, 2022, after I served a second emergency motion pursuant to pursuant to FRCP R. 52(b), 59 (e), and 60(b)(1)(2)(6) additional facts must be presented and considered by the court to prevent manifest injustice, and to allow for relief this court Plaintiff already requested pursuant to FRCP R. 65 in her motions for a preliminary injunction and temporary restraining order. (D.I. 6, 7, 8, 9, 10, 11, 33) (Ex. A, Return receipt of January 18, 2022 motion served to the court).

2. The Defendant Board rendered a decision, attached hereto, denying me of the right to subpoena witnesses, cross examine witnesses, and present evidence, by denying her ability to collect the same, in defense of my exercise of fundamental rights without state interference and punishment by bringing the petition against me, but for my religious beliefs and exercise of fundamental rights including the freedom of conscience to think, believe, exercise religious beliefs, speak based on her beliefs, petition the courts, and associate. (Ex B, informal decision along with critical emails)

3. The State has brought a petition against me for my faith in Jesus Christ. Defendants appear to think my worship of God instead of money and material gain is a mental disability. Jesus says you cannot serve God and money. I believe people go to hell for organized charity, pro bono, fundraising, forcing individuals to work as discipline in violation of the 13th Amend., and **blindly** doing what they are told at a job for money to care for their family, while not caring to **see clearly to love God** as God, instead of money as savior and God, and not caring to **see clearly to love others**, by understanding how their product or service may harm others God loves.¹

4. On December 13, 2017, the Delaware Supreme Court appointed counsel despite having notice of my objection.

¹ (Emphasis intended, See, *Jn.* 12:40, *Lk.* 11:34)

5. I experienced emotional distress relating to this government compelled violation of my religious belief and filed a number of papers before the Delaware Supreme Court granted me permission to represent myself on December 30, 2021.

6. Prior to that date, I filed a motion for time to prepare a defense, research and perform discovery to determine which witnesses to call.

7. I followed up numerous times with the Board on the status of my motion, but it was not until January 10, 2022, that an indirect determination was made. The Board ignored my motion, escaping an appealable order to deprive me of an opportunity to be heard in violation of the substantive and procedural due process clause, arguably basing their disparate treatment towards me, by partiality towards the state, demeaning my religious beliefs, religious exercise and exercise of the right to petition, and associate and speak, as unworthy of protection in violation of the Equal Protections Clause, and the Due process and substantive due process clause of the 14th Amend. (Ex B).

8. On January 11, 2022, I filed an emergency motion, simultaneously with the Board and Delaware Supreme Court, appealing the refusal of the Board to afford me an opportunity to prepare a defense, gather facts, research and perform discovery.

9. The Delaware Supreme Court denied my appeal, since the unofficial decision rendered by the Board maliciously designed to prevent a fair opportunity for me to be heard and appeal, was not deemed a final appealable order by the Delaware Supreme Court.

10. The Board rendered an order later on January 11, 2022.

11. Without delay, I appealed this order with the Delaware Supreme Court on January 12, 2022.

12. The next day, January 13, 2022, I filed a motion for an emergency immediate decision on my January 12, 2022 appeal.

13. The following day, January 14, 2022, the State brought an answer to a motion rendered moot to harass and distract me, knowing I argued I did not have enough time to prepare and present a defense, with no opportunity for discovery or to call witnesses.

14. The day after that, Saturday, January 15, 2022, I served a different motion with the Board to call specific witnesses, requesting subpoenas, and additional time to send Requests for admissions and interrogatories to Defense Counsel, which are necessary for my defenses to this case, the illegality of the proceeding as applied, motivated by the state's desire to punish me for my exercise of protected conduct in contravention to the First Amendment applicable to the State pursuant to the 14th Amend., and in violation of the Equal Protections Clause

by disparate treatment towards me based on my religious beliefs and poverty, deeming me unworthy to be heard and unworthy of other Constitutional rights.

15. Immediately after the holiday weekend, two business days after my appeal, on Tuesday, January 18, 2022, the Delaware Supreme Court denied my appeal, which was based on protecting my fundamental rights. (Ex C., attached Order, dated January 18, 2022, Ex D, prior Order of the Supreme Court, dated January 11, 2022, Ex F, prior order of the Board, dated January 11, 2022).

16. My defense of subject matter jurisdiction is based on the Delaware Supreme Court's participation in inciting the illegal proceeding, as applied.

17. On my January 15, 2022 motion filed with the Board, , I noted the court's apparent participation, and the need to cross examine Chief Justice

18. The Court maliciously indicated, indirectly the right to a fair, impartial, opportunity to be heard, opportunity to defend basic liberties was somehow frivolous, to allow the lawless reign of lusts, their will be done, instead of honoring the Constitutional protections afforded to me, the least of these, in violation of the Equal Protections Clause, and substantive and procedural due process clause. (Ex. C)

19. The Delaware Supreme Court is depriving me of an opportunity to be heard and a fair trial. The Board denies me the right to prepare a defense, to subpoena witnesses, and cross examine necessary witnesses. This is not a lawful

proceeding. This is my hanging but for my belief in Jesus the Christ. I am in great immediate danger.

20. The Court indicated it would not hear any frivolous motions, giving a colluding sign to the Board not to file an official order, to prevent my opportunity to be heard on appeal.

21. On January 18, 2022, the Board rendered a decision, while not placing the decision in an official Order with the intent to deprive me of the opportunity to be heard on appeal. (Ex. B).

22. An unlawful secret proceeding is scheduled against me on Friday, January 21, 2022, with the purpose to punish me for exercising my religious beliefs, speech defending the exercise of such beliefs without government sponsored burdens, and petitions relating to my exercise of fundamental rights, and my associated rights as a Christian, as an American and as an attorney to believe in Jesus Christ without compromise, and without sacrifice of fundamental rights or my license to practice law. (Ex B)

23. The Supreme Court appears to be conspiring with Defendants to punish me in violation of 42 USC Sections 1983, 1988, and in potential violation of 1985(2), with intent to harass and interfere with my assertion of Constitutional rights, by depriving me of a fair opportunity to be heard.

24. The Court and its members must be included on the Complaint as necessary Defendants, including Chief Justice Collins J. Seitz, Jr., Justice Traynor, Justice James T. Vaughn, Jr., and Justice Tamika R. Montgomery-Reeves. The latter three reviewed and rendered orders in *Kelly v Trump*. I seek equitable relief and nominal relief for deprivation of my constitutional rights.

25. I am grateful I informed the Court of my intent to add the Delaware Supreme Court and its members as Defendants, prior to receipt of the January 18, 2022 state Supreme Court order by service of my Motion, *Plaintiff's Second additional motion pursuant to FRCP R. 52(b), 59(e) and 60(b)(1)(2)(6) to amend findings of facts and alter the order, dated December 22, 2021, based on new findings of fact, to prevent clear error of facts, clear error of law, and to prevent manifest injustice*, incorporated herein by reference in its totality.

26. My intent is now cemented by the great injustice towards me, and injustice towards all Americans by disparate selective application of who is worthy of Constitutional rights, by denial of my rights merely because they disagree with my personal beliefs.

27. In America I am free to believe differently, even have beliefs others find repugnant, or unsound. In America I should be free to worship Jesus Christ without sacrificing fundamental rights, and without sacrificing my paid for active license to practice law.

28. On October 26, 2021, I asked a Court representative, Renee Buskirk, to ask the Chief Justice whether he filed a complaint against me to get De-Lapp and the ODC, in hopes to get an affidavit to prevent the need to subpoena the Chief Justice as a witness. (Ex. B)

29. To my horror, I discovered Renee appeared to work for Defendant, ODC, as I later discovered her on an email with the Defendants. (Ex. F)

30. The Defendants knew of my desire to question Chief justice and other witnesses. I asked for opportunity to perform discovery in hopes to gain answers in a gentler form than subpoenaing witnesses. (Ex. B) However, with the recent denial of the Board on January 11, 2022, and denial of the appeal to the Supreme Court, dated January 18, 2022, I had no choice but to act in presumptive haste by filing a motion on January 15, 2022 to subpoena witnesses to cross examine during the state court hearing.

31. The Delaware Supreme Court's assertion relating to ignoring frivolous appeals, while not calling the appeal frivolous is a signal for the Board not to render an order so as to deprive me of the opportunity to be heard on appeal.

32. The Delaware Supreme Court's assertion that having an opportunity to prepare and present a defense based on 1. illegality of proceeding as applied, and 2. lack of subject matter jurisdiction, due to its own incitement or participation in inciting its arms of the court to attack me, but for the exercise of fundamental

rights, is unworthy of consideration, is clear evidence of its inability to be impartial in my case.

33. I object to the illegal proceeding as applied. I object to the deprivations of my substantive and procedural due process rights, as applied to me by denying me opportunity to research, collect evidence and prepare a defense. I objected to lack of notice and the form of notice provided as insufficient by the Board for any hearing. I objected to the denial of my right to cross examine and present a defense in violation of the 6th Amend.

34. The State must meet strict scrutiny to overcome any of my objections, which it cannot meet, rendering these violations of my Constitutional rights unexcusable.

35. I am incredibly disappointed in the lawlessness exhibited by the state.

36. I also objected to the closed proceedings, and requested the proceeding be conducted in open court to protect me from secret, concealed collusion from the state to let their will be done, instead of applying limitations on the state with the rule of Constitutional law.

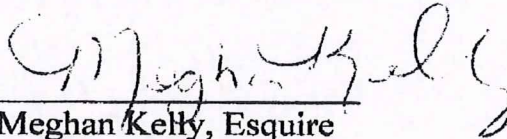
37. On January 18, 2022, I filed a different motion with the Court, the Court is scheduled to receive today with information that I include and incorporate herein by reference in its totality.

38. I do not waive my motions to exemption of PACER fees, but am filing this now, so as not to violate a greater sin against God by failure to assert my rights. Not all sins are weighted the same per Jesus the Christ. (*Matthew 23:23*). Injustice in the courts is damnable per God, by loving costs, convenience and comfort more than God or one another. (*Amos 5:15*); (*Also see, Isaiah 10:1-2* “Woe to those who enact unjust statutes and issue oppressive decrees, to deprive the poor of fair treatment and withhold justice from the oppressed.” Whenever God says “Woe to you” I believe it means damned to hell are you should you not repent by unhardening your head and unhardening your hearts to love to overcome lusts that lead to the second death.).

Wherefore I pray the Court grants my motion to appeal and immediately reconsiders my motions for a temporary restraining Order and preliminary restraining order to enjoin the hearing scheduled January 21, 2022.

Dated Jan. 19th, 2022

Respectfully submitted,


Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
Unrepresented indigent party,
Not acting as attorney advocate
Bar No. 4968
(Word 2, 237)

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

Dated: 1/19/22

Meghan Kelly (printed)

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'S SECOND ADDITIONAL MOTION PURSUANT TO FRCP R. 52(b), 59(e) and 60(b)(1)(2)(6) TO AMEND FINDINGS OF FACTS AND ALTER THE ORDER, DATED DECEMBER 22, 2021, BASED ON NEW FINDINGS OF FACT, TO PREVENT, CLEAR ERROR OF FACTS, CLEAR ERROR OF LAW, AND TO PREVENT MANIFEST INJUSTICE

Plaintiff, Meghan M. Kelly, pro se, this 1/18/22, pursuant to FRCP R. 52(b), 59 (e), and 60(b)(1)(2)(6) moves this Court to alter and amend the judgment of the Court in its 12/22/21 order to (1) include the availability of new evidence not available previously available, and to later the order (2) to correct a clear error of law, (3) clear error of fact, (4) and to prevent manifest injustice.

1. I also am providing notice that I will likely, to my chagrin, amend my complaint to include the Delaware Supreme Court as a Defendant and individual judges for nominal and equitable relief.¹ The Supreme Court incited, participated or caused the unlawful retaliatory state Court proceeding and the Delaware Supreme Court arms' interference in my lawsuit *Kelly v Trump* on violation of 42 USC Section 1985(2). Whether the Delaware Supreme Court's report to DE-Lapp was out of concern for poverty or a malicious purpose is in issue. A complaint was made apparently by the Supreme Court or its agent based on my petition for relief from attorney

¹ I respectfully request to include nominal damages should the Court allow amendments to the complaint. See, *Freedom from Religion Found. Inc. v. New Kensington Arnold Sch. Dist.*, 832 F.3d 469, 490, 2016 U.S. App. LEXIS 14594, *49-50. Also see, *Molina v. Pa. Soc. Serv. Union*, 2019 U.S. Dist. LEXIS 120040, *27, 2019 WL 3240170.

dues to the arm's of the Court. (Ex.1st A). De-Lapp, an arm of the state court, would never have attacked me, but for this petition relating to lawyer license dues, per their own admission. (D.I. 3, District Court Exhibit 13, D.I. 9, Exhibits 1, 2, 3). The Delaware Supreme Court did not grant my petition, and ignored my second petition, deeming me unworthy of the opportunity to be heard on relief from attorney dues, in potential violation of the substantive and procedural due process clause, and in violation of the Equal Protections Clause of the 14th Amend. as applied to me, a party of one, for disparate treatment motivated by my poverty, religious beliefs or exercise of fundamental rights. This Court overlooked the Delaware Supreme Court's apparent incitement of the unlawful proceeding against me in state Court by its arms, brought to punish me, but for, my exercise of Constitutional rights. I desire to protect the Courts, to protect those I seek to correct in this case. I am sad your honor did not enjoin the state proceeding to date, forcing me to add the Delaware Supreme Court and its members. My hope of a hero to preserve our union and to make it more just and freer is with the Courts.

2. I am getting sued by the government for my faith in Jesus Christ. Defendants appear to think my worship of God instead of money and material gain is a mental disability. Jesus says you cannot serve God and money. (D.I. 20, 21). ((Ex. A), Email to Defendants regarding my religious beliefs since my religious beliefs are in question), also see (Ex. C, Ex D, Ex. Ex. E, internal Ex. F, H, I).

3. I am making this Motion in addition to, not in amendment of or in replacement to the previous motion (also referred to "M1"), I made seeking similar relief, albeit with additional facts which must be included to prevent clear error of fact, of the law and to prevent manifest injustice. Since, I filed that motion served to the Court and Defendant via US Mail on 1/10/21,

new and additional facts arose which must be considered by this court to prevent manifest injustice.

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

5. **On 12/29/21**, I also served a letter with exhibits with both the Delaware Supreme Court and Defendant Board notifying them,

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

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

7. I have not been afforded a fair opportunity to prepare a defense, research, gather evidence, and facts and file motions I noticed the Board and Court I intended to file, after a fair investigation was allowed in conformity with the standards of Constitutional due process, 1. to dismiss the petition based on illegality of proceeding and 2. a separate motion to dismiss based on lack of subject matter jurisdiction due to the Supreme Court's participation in inciting the petition against me, but for the exercise of my Constitutionally protected rights.

8. I repeatedly, checked on the status of my motion to postpone the hearing, and opportunity to prepare a defense, and only heard back on 1/10/22. The Board indicated the hearing was on schedule for 1/13/22. (Ex D at internal Ex. B).

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

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

11. On 1/11/22, the Delaware Supreme Court swiftly granted an order denying relief based on jurisdiction. (Ex. E Internal-Ex. B).

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

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

14. On 1/11/22, the Board granted an order postponing the hearing for eight days **due to alleged illness**, a reason not included in my motion. (emphasis intended) 6(Ex. E Internal-Ex. B). The Board was aware I was not feeling well when I immediately notified them, I was not feeling well, a week earlier. (Ex. E, internal Ex J, and Ex F).

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

16. I notified the Board and ODC of my opposition to examination by health or mental health professionals based on religious objections in my Answer to the petition, and through E-mail, despite the ODC seeking to tempt me to include such an argument in a motion. (Ex. E. at Internal Exhibits G, H, I, L, M), (Ex F).

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

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

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

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

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

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

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

23. So, I made a motion, once again to suspend the hearing date, to call witnesses, and perform discovery for my defense of exercise of fundamental rights without the state's punishment for my exercise. I have the right to believe, think and exercise my faith differently than the majority. Individual liberties, such as my right to an impartial proceeding, an opportunity to be heard, adequate notice, opportunity to perform research and a defense without disparate unfair treatment, motivated by the state's disdain for my religious beliefs, are protected by Constitutional Law from government backed mob reign of controlled, conditional, conformed

lusts. I am not sitting on this, but am acting in haste to protect and assert my Constitutional rights to prevent waiver.

24. On 1/15/22, I filed a motion for immediate emergency relief, and a new motion with the Board, attached hereto, and incorporated herein in total, *Respondent's more particularized motion to suspend the hearing, scheduled for January 21, 2022 to allow me opportunity to research and prepare a defense, requesting opportunity to draft requests for admission, interrogatories and subpoena opposing counsel, Patricia Swartz, as a necessary witness in her defense, and subpoena other necessary witnesses, including but not limited to, Chief Justice Collins J. Seitz, Judge Kenneth S. Clark, Jr., due to his admission he interrogated me based on my exercise of fundamental rights incited by the ODC, and Arline Simmons, to show unconstitutional motive for this petition, to allow, the accused, respondent an opportunity to defend herself on the defense illegality of proceeding, as applied to her, motivated by disdain by the state for her religious associated beliefs and exercise of fundamental rights, and lack of jurisdiction based on the Delaware Supreme Court's apparent participation in inciting this petition against respondent.*

25. There are only 3 business days before the rescheduled hearing. I informed Defendants I am not ready, and need time to prepare a defense, to subpoena witnesses, to perform legal research and to draft motions based on additional facts found in discovery. The Defendants fail to grant me a fair opportunity to build my defense, despite my multiple requests in contravention of conformity with the requirements of a fair proceeding under the Due Process Clause. There is no legitimate or important reason for Defendants to rush this matter at the cost of eliminating my right to an opportunity to prepare a defense and at the cost of creating an

unfair proceeding in violation of the substantive and procedural Due Process Clause and the Equal Protections Clause of the 14th Amend.

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

27. “Congress, the Executive, and the Judiciary all have a duty to support and defend the Constitution.” *Salazar v. Buono*, 559 U.S. 700, 717 (2010). Defendants act above the law, and declare me below the law, by denial of Constitutional protections, motivated by disdain for my religious beliefs and poverty.

28. I will suffer continued irreparable harm if I am unable to gather testimony and facts to provide a defense of dismissal of the petition, based on subject matter and illegality of proceeding, as applied, under the facts of the case, to chill the exercise of my fundamental rights, thereby chilling the rights of others by such unconstitutional precedent. “The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.” *Mullin v. Sussex Cnty., Delaware*, 861 F. Supp. 2d 411, 427 (D. Del. 2012); Citing, *Indian River Sch. Dist.*, 653 F.3d at 283 n. 14 (quoting *Elrod v. Burns*, 427 U.S. 347, 373, 96 S.Ct. 2673, 49 L.Ed.2d 547 (1976)).

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

Defendants have not met the burden of strict scrutiny to infringe upon my exercise and assertion of Constitutional rights.

30. The right for the opportunity at justice is not a guarantee. It is the right to petition the Courts, without state punishment, that must be protected. Otherwise, only the Courts may selectively apply who has rights or not in violation of the Equal Protections Clause.

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

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

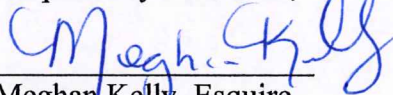
34. The Free exercise of speech, association, right to petition, and religious exercise, and freedom of conscience have not been sold, making it not a freedom, but a bargaining chip to exchange by relinquishment to serve business greed.

35. I have not sold soul to hell in exchange with the license to practice law.

WHEREFORE, this court must amend findings of fact, alter the order, dated December 22, 2021, based on new findings of fact, to prevent clear error of facts, clear error of law, and to prevent manifest injustice.

1/18/22

Respectfully submitted,



Meghan Kelly, Esquire

DE Bar Number 4968

34012 Shawnee Drive

Dagsboro, DE 19939

meghankellyesq@yahoo.com, (3,177 Words)

I declare, affirm that the foregoing statement is true and correct under the
penalty of perjury, dated 1/18/22

Meghan Kelly (printed)

Meghan Kelly (signed)

Meg Kelly
34012 Shawnee Dr.
Dagsboro, DE 19939

		Retail
P	US POSTAGE PAID	Origin: 19970 01/18/22 0953900970-56
	\$8.23	
PRIORITY MAIL 1-DAY®		
		3 Lb 3.60 Oz 1005
EXPECTED DELIVERY DAY: 01/19/22		
		C012
SHIP TO: 844 N KING ST UNIT 18 WILMINGTON DE 19801-3519		
USPS TRACKING® #		
9505 5149 9861 2018 8867 77		

FILED
JAN 19 2022
U.S. DISTRICT COURT
DISTRICT OF DELAWARE



Office of the Clerk
United States District Court
844 N. King St. Unit 18
Wilm. DE 19801

**U.S.M.S.
X-RAY**



Handle with Care / Fragile



how2recycle.info

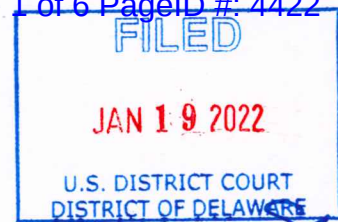


TABLE OF CONTENTS

EXHIBIT 1ST A, Letter of investigation by arm of state court, dated May 24, 2021

EXHIBIT A, E-mail to Defendant regarding my religious beliefs, and world economic forum founder's plan as outlined in the two books The Fourth Industrial Revolution "to entice people through temptations to make 47 percent of Americans unemployed, to use the unemployed by labeling them mentally disabled, for mad science to teach the lie the mind can be controlled through robotics and medicine."

EXHIBIT B Letter Motion, Dated December 18, 2021 to Board, DE Supreme Court and Defendant regarding discovery, reconsideration of counsel, and postponement of hearing due 1. to ineffective service, until after a final determination is made on counsel, and 3. Until discovery is complete, and the Receipt and postal confirmation Board and ODC received the December 18, 2022 filing on December 21, 2022

EXHIBIT C Respondent's Objection to and Motion to enjoin expert observation and analysis of Respondent at hearings and in discovery; notice she will move for a protective order during the discovery stage, and requests to prevent costs as going into Debt is against her religious beliefs, and

Memorandum of Law in Support and Respondent's Objection to and Motion to enjoin expert observation and analysis of Respondent at hearings and in discovery; notice she will move for a protective order during the discovery stage, and requests to prevent costs as going into Debt is against her religious beliefs

EXHIBIT D Respondent Meghan M. Kelly's Emergency Objections and Emergency Motion filed with both the Board of Professional Responsibility for the Supreme Court of Delaware, and the Delaware Supreme Court, simultaneously, to postpone the hearing against her to prevent manifest injustice to afford her an opportunity to perform discovery, potentially call witnesses and prepare a defense for the state's allegedly illegally motivated petition against her for her exercise of fundamental rights, motivated by the state's disdain for her religious political beliefs, dated January 11, 2022,

Exhibit A excluded since it is a District Court Doc.

Exhibit B includes internal exhibits, in one saved document

1. Email to Board and Patricia Swartz, dated Thursday, January 6, 2022, following up on motion to postpone the hearing one week from the date, to afford a full and fair trial, including an opportunity to gather evidence, so as not to violate the substantive and procedural due process clause, and an opportunity to use the evidence to present motions, including a motion to dismiss based on subject matter grounds.

2. Email to the Board and Patricia, dated Monday, January 10, 2022, follow up on status of my request to postpone the hearing.

3. Email to the Board and Patricia, dated Friday, December 24, 2021, regarding following up on my request to postpone the hearing, and the outstanding issues relating to appointed counsel verses permission to represent myself, undecided by the Court. Notice of my intention to file a Motion objecting to an expert's attendance at the hearing as against my religious beliefs, and notice of my intent to file a protective order to protect myself from examinations from mental health and physical health experts on religious grounds.

4. Email notification the Board member is out until December 28, 2021, dated December 24, 2021.

5. Email from the Board dated January 10, 2022, indicating the Board plans to move forward with the virtual hearing as scheduled, despite my appeal based on improper notice, and the need to prepare to defend my case.

6. Email to the DE Supreme Court, Board and Patricia, dated January 6, 2022, regarding the federal government is helping me with the vulture attacks.

7. Accidental duplicate of Dec 24, 2021 email, at No. 3.

8. Email to Court, dated December 22, 2021, forwarded emails to appointed counsel, firing him, and copying to others to protect my safety, dated December 21 and 22, 2021.

9. Email to Court asking for the Board's number, December 22, 2021. I was only able to leave messages.

EXHIBIT E Respondent Meghan M. Kelly's **motion appealing** the Order of the Board on Professional Responsibility of the Supreme Court of the State of Delaware dated, January 11, 2022, granting postponement of the hearing for 8 days due to illness, not a reason identified in my motion to grant postponement to afford me opportunity to prepare a defense, perform discovery, research, file motions, be heard on outstanding motion(s) unaddressed by the Board, to defend my exercise of fundamental rights and to preserve my license to practice law, on the grounds the amount of time is not enough and a hearing date must be postponed until after a fair opportunity to build a defense is granted, and moves the court to suspend a hearing date until the parties and the Board determine a fair opportunity to perform discovery has been allowed so as not to violate the norms of a fair proceeding, displaying disparate treatment towards respondent based on her unique religious political beliefs, in violation of the Equal Protections clause applicable to her as a party of one, **dated January 12, 2022.**

(Internal Exhibits) Exhibit A Respondent Meghan M. Kelly's Emergency Objections and Emergency Motion filed with both the Board of Professional Responsibility for the Supreme Court of Delaware, and the Delaware Supreme Court, simultaneously, to postpone the hearing against her to prevent manifest injustice to afford her an opportunity to perform discovery, potentially call witnesses and prepare a defense for the state's allegedly illegally motivated petition against her for her exercise of fundamental rights, motivated by the state's disdain for her religious political beliefs, dated January 11, 2022

Exhibit B The Delaware Supreme Court Order Denying my emergency objections and motion to postpone the hearing.

Exhibit C The Board Order granting a postponement of the hearing to the date January 21, 2021, "due to illness," a reason I did not request.

Exhibit D Email to Patricia Swartz, dated January 3, 2022, regarding I am not feeling well, took a covid tests, amd negative, but believe I am developing the shingles.

Exhibit E Email to Board, Lisa at the Supreme Court and Patricia Swartz regarding still sick, problems with phone, and vulture issue at home, which may interfere with scheduling, also attached pictures of the vultures

that chase me and peck at the glass windows, and do not go away when I yell at them.

Exhibit F Email from the Board dated January 10, 2022, responding to my most recent request on my motion to postpone the hearing indicating “The Board plans to move forward with the hearing as scheduled

Exhibit G Email To the Board and Patricia, dated December 24, 2021, regarding

1. I received docket ending before December 21, 2021,
2. Told the Board I would send them my November 19, 2021 answers to the petition via email for ease,
3. Indicated the Board is aware of my request to postpone a hearing date so I may properly defend my exercise of Constitutionally protected activity from state retaliation, but for the exercise of fundamental rights, requiring the government to bear the burden of strict scrutiny.
4. I told the Defendants I intend to file a motion objecting to an expert's attendance at a hearing, as it is against my religious beliefs. I am a child of God, not a scientific object for observation and examination by health or mental health examiners who play God by seeking to mold people like me to scientifically conditioned and conformed dictates instead of protecting the individual's dictates of conscience. Experts deem those whose will does not bend with temptations to adhere to the communally accepted trendy molds as unfit. My God teaches me those who are conformed to the world do not have eternal life and will be unfit for heaven, should they not repent.
5. I also told the Defendants I will likely file a protective order to protect myself from examination from mental health or physical health experts on religious grounds, should petitioner seek an examination. My exercise of fundamental rights, including exercise of my religious beliefs, requires the state meet strict scrutiny, which it is not likely to meet.

Exhibit H Emails dated January 11, 2022, email from Patricia Swartz to Board and me, objecting to postponing the hearing, and my responses, including my right to believe differently than the majority, and my religious objections to healthcare.

Exhibit I Email January 11, 2022, my email responding to opposing counsel, providing religious objections to healthcare and my religious beliefs, my disagreement with many democrats on healthcare when I ran for office in 2018, and a sign healthcare that cares not healthcareless, your health is your wealth, as I was still under the weather.

Exhibit J January 4, 2022 email to Court, Board and Defendant regarding I wasn't feeling well. The covid test was negative, but looks like I developed shingles.

Exhibit K Email, dated January 5, 2022, relating to a broken phone through the federal government

Exhibit L Email dated December 31, 2022, to the Board of motion, *Respondent Meghan M. Kelly's objection to and motion to enjoin expert observation and analysis of respondent at hearings and discovery; notice she will move for a protective order during the discovery stage; and requests to prevent costs as going into debt is against her religious beliefs; Memorandum of law in support of this motion, certificate of service, postal receipt, table of contents of the exhibits, and exhibits thereto contained, dated December 31, 2021*

Exhibit M Emails January 12, 2022, regarding I was not making a new motion merely because I communicated with the Board and Defendant I desired time to afford a fair opportunity to prepare a defense.

Exhibit F Answer to petition, excluding exhibits.

Exhibit G *Respondent's more particularized motion to suspend the hearing, scheduled for January 21, 2022 to allow me opportunity to research and prepare a defense, requesting opportunity to draft requests for admission, interrogatories and subpoena opposing counsel, Patricia Swartz, as a necessary witness in her defense, and subpoena other necessary witnesses, including but not limited to, Chief Justice Collins J. Seitz, Judge Kenneth S. Clark, Jr., due to his admission he interrogated me based on my exercise of fundamental rights incited by the ODC, and Arline Simmons, to show unconstitutional motive for this petition, to allow, the accused, respondent an opportunity to defend herself on the defense illegality of proceeding, as applied to her, motivated by disdain by the state for her religious associated beliefs and exercise of fundamental rights, and lack of*

jurisdiction based on the Delaware Supreme Court's apparent participation in inciting this petition against respondent.

(Internal Exhibits) Exhibit A Post Office Receipt, and certified mail receipt and confirmation the December 18, 2021 letter motion requesting opportunity to perform discovery and file motions to dismiss was received by the Board and ODC on December 21, 2021

Exhibit B Postal Receipt for December 29, 2021 letter to Court, Board and ODC, dated December 29, 2021

Exhibit C Emails to and from Patricia regarding moot motion

Exhibit D January 12, 2022 email correction to Motion filed January 12, 2022, the federal government is helping me with the vultures, forwarded email from the Federal government representative.

Exhibit E Email to and from federal government official relating to the fact there is no charge for federal assistance with elimination of vulture problem, so as not to violate my religious beliefs.

Exhibit F Email filing dated Thursday, January 13, 2022, motion to expedite motion to appeal with the Delaware Supreme Court.

Exhibit 1st A

After Judge Clark's interrogation

Delaware
Lawyers Assistance Program

Carol P. Waldhauser, Executive Director
The Renaissance Centre
405 N. King Street, Suite 100 B
Wilmington, Delaware 19801
www.de-lap.org

Private: (302) 777-0124
Toll Free: 877-243-3527
Fax: (302) 658-5212
cwaldhauser@de-lap.org

MAY 24, 2021

CONFIDENTIAL

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

Dear Meghan:

We understand that you may be experiencing some financial difficulties with regard to license fees, etc. As a member of the Delaware Bar we care about you. For that reason, we are reaching out, confidentially, to see if we might be able to offer assistance to you.

The Delaware Lawyers Assistance Program, The SOLACE Committee, The Delaware Lawyers Assistance Fund and the Professional Guidance Committee all provide support to attorneys who may need resources for basic needs, as well as referral options as needed or required. Again, these services are free and confidential.

To better understand, how we can assist, we want to meet with you - either virtually - or in person. Do you have WIFI available where we might meet virtually? Or in the alternative, are you able to come in Georgetown to meet? Once again, this is confidential, and we would like to be able to explore our resources and determine if our services can help you.

So please, reach out to us either by e-mail or phone. Our information is: Carol cwaldhauser@de-lap.org and/or Eleanor can be reached at emkiesel@aol.com, or call Carol at DE-LAP 302-777-0124. We hope that you can connect with us and see if our resources and/or referrals can assist you Remember, DE-LAP is a Confidential, Free, Non-Judgmental Service Just for Delaware Lawyers and Judges. Equally important, we do together what need not be done alone!

Very truly yours,

Eleanor M. Kiesel, esq
Eleanor M. Kiesel, Esquire, PhD., Lawyers Assistance Committee

Carol P. Waldhauser
Carol Waldhauser, Executive Director, Lawyers Assistance Program (DE-LAP)

Electronically forwarded with encls: meghankellyesq@yahoo.com

SOLACE and LAC

From: Carol Waldhauser (cwaldhauser@de-lap.org)

To: meghankellyesq@yahoo.com

Cc: emkiesel@aol.com

Date: Monday, May 24, 2021, 11:58 AM EDT

Meghan:

Please find attached a self-explanatory letter.

Please contact us within the next 10 days regarding it.

Thank you.

Carol

Carol P. Waldhauser, Executive Director

The Delaware Lawyers Assistance Program

(DE-LAP)

405 N. King Street, Suite 100B

Wilmington, DE 19801

(302) 777-0124

Cell: (410) 409-8874

cwaldhauser@de-lap.org

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FREE, CONFIDENTIAL AND NON-JUDGMENTAL, DE-LAP has assisted the Delaware Bar with quality of life and quality of professionalism issues. We Do Together What Need Not Be Done Alone!

Threat 10
days

Exhibit A

47 percent of Americans unemployed by design BD 11537 B

From: Meg Kelly (meghankellyesq@yahoo.com)

To: patricia.schwartz@delaware.gov

Cc: lisa.dolph@delaware.gov; karlis.johnson@delaware.gov

Date: Wednesday, January 5, 2022, 12:58 PM EST

Hi Patricia,

I believe people go to hell for fundraising and organized charity should they not repent of such wickedness. Jesus teaches it is not true charity in Matthew 6:1-4. I think donations to colleges with strings attached has misguided research and controlled what is expertise. Science is driven by the love of money to control people, driving out love for one another, instead of freely (not for sale forced) encouraged by the love of the truth, and the pursuit to find it to care for, not control, humanity.

I did not realize how bad the world was until I ran for office. The democrats hated my proposed plans to improve healthcare to care for people, instead of exploiting their need to serve greed, not good, with more bad care. It was if they knew a pandemic was planned. See my complaint against the democrats.

Our libel laws protect serving what I believe is the beast spoken of in Revelation, business greed, at the cost of killing, stealing and destroying people. Human sacrifice for material gain is against my religious beliefs. Money through grants and donations encourages bad business, by rewarding bad care. Protecting the free exchange of ideas, including finding flaws and criticism in business proposals, would improve care. The libel laws inhibit improvements, stifling the free flow of ideas and speech. The donations and government grants to schools buy control of a no longer free market, but a forced, compelled market in violation of the 13th Amendment.

My religious beliefs that money is not God, money is not what controls me, do not align with what the world teaches. My religious belief in love for humanity and for God pose no danger but offer protection towards humanity by entities who would sacrifice their life and liberty to serve greed, not good.

Individuals are what hold the government together, not money. The love of money and material gain may destroy our government if it's not tempered with the rule of just laws to care for humanity.

There is a plan to entice people through temptations to make 47 percent of Americans unemployed, to use the unemployed by labeling them mentally disabled, for mad science to teach the lie the mind can be controlled through robotics and medicine. Please see the book I provided to you *The Fourth Industrial Revolution*. Look at the last few pages. My God teaches me, we have free will, not a controlled will through medicine and robotics. We have a choice, no matter the temptations to sin, the pressures to violate our faith, even the choice of death in order not to violate our religious beliefs in God's will.

There is a plan to harm humanity to control humanity by eliminating the governments' power to govern, and the eventual elimination of our government.

The Courts are my hope of a hero to stop the lawlessness in the other two branches of government, to prevent the wicked schemes by those who entice our government officials to give into temptations. The government must govern and guide, not collude or market businesses and be controlled by business greed, allowing entities to be above the law, to the ultimate destruction of the law down the line as government private partners take over the governing function of governments by the lawless reign of its desires without restraint in the form of just laws.

The world is in trouble. The courts can only save us by preventing or reversing the manufactured crash of the dollar, and the "Great Reset," if someone with standing to sue either of the two other branches, asks them. I am hoping an Attorney General may have the courage to do so.

I know I may get into trouble for asking you to care to love humanity above money to do a job. Despite that I have hope that maybe one of you three someday will choose to reflect the image of God, by unconditional love, to be a hero by preventing great harm. We are not stuck should individually judges behave as more than machines, but as humans capable of reflecting the image of God by love. We have free will no matter if others lie by saying there is no choice.

There is always a choice to do the right thing, right now, to exercise our freedom of conscience to love humanity instead of merely going through the motions of a job for the love of money. We need a hero. I hope an individual judge will choose to save humanity.

I hope you have a good day.

Very truly,
Meg
Meghan Kelly
34012 Shawnee Dr
Dagsboro, DE 19939
meghankellyesq@yahoo.com
4968

Exhibit B

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive

Dagsboro, DE 19939

Administrative assistant to the Board on Professional Responsibility

405 N. King Street, Suite 505

Wilmington, DE 19801

RE: Entitled to Discovery/Reconsideration on counsel/postpone hearing until
counsel determination and discovery is complete including appeals/ ODC Board
Case No. 115327-B (Meghan M. Kelly, Esquire)

December 18, 2021

Dear Board members:

On Thursday, December 16, 2021, I received the Delaware Supreme Court's order, dated December 13, 2021, regarding the appointment of counsel, despite notice of my intent to object, attached hereto. On Friday afternoon, December 17, 2021, David Hutt, Esquire emailed me the notice of hearing you sent dated December 10, 2021.

Please be advised, service was ineffective. I did not receive this through the mail. I object to the ineffective service to me, and to the appointment of counsel.

I intend to file a motion for reconsideration with the Delaware Supreme Court on Monday December 20, 2021.

I am entitled to discovery, and would like time to draft interrogatories and perform other discovery before a hearing is conducted.

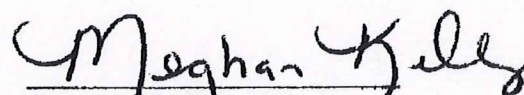
I respectfully request we post pone scheduling hearing until:

1. a final determination is made on my opposition to counsel, and
2. Until discovery is completed.

Please be advised, I immediately told David Hutt, Esquire of my intention to the appointment of counsel per the attached.

Thank you for your kind consideration.

Very truly,



Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
No Phone
meghankellyesq@yahoo.com
Bar Number 4968
(Word Count 270)

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

Dated: December 18, 2021

Meghan Kelly (printed)

Meghan Kelly (signed)

EXHIBIT 1

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive

Dagsboro, DE 19939

Clerk of the Supreme Court

55 The Green

Dover, DE 19901

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

November 22, 2021

Dear Clerk:

I intend to object to the ODC's attached request for appointment of counsel with regards to the above referenced matter for me on religious grounds, and object to potential costs too. Albeit the letter noted the appointment of an attorney would be "without cost."

Thank you.

Very truly,

/s/Meghan Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
No Phone
meghankellyesq@yahoo.com
Bar Number 4968

CC: Office of Disciplinary Counsel Patricia B. Schwartz

EXHIBIT 2

12/17/21, 2:44 PM

Yahoo Mail - Re: Board Case NO. 115327-B/Motion for reargument Counsel/

Re: Board Case NO. 115327-B/Motion for reargument Counsel/

From: Meg Kelly (meghankellyesq@yahoo.com)

To: dhutt@morrisjames.com

Cc: meghankellyesq@yahoo.com

Date: Friday, December 17, 2021, 02:43 PM EST

Good afternoon,

Thank you for the message. I do not have any working phone. There is no way to get a hold of me by phone. E-mail, so long as I have internet may be the best way. I am receiving internet through a government program that may end February 18, 2022.

I am in receipt of the letter appointing you as counsel, received yesterday. I intend to file a motion for reargument and an objection to the appointment of counsel on religious grounds, and on due process grounds on Monday. I am pretty shaken up as I gave the court notice of my intent to object.

I will keep you in the loop. I have not drafted anything yet, and will appeal to the US Supreme Court should it be denied.

Thank you for forwarding the attachment relating to a hearing. I must file a motion for an extension of time, or in the alternative, maybe you can until a final determination on reargument relating to counsel.

I intend to be in Georgetown on Monday to hand in my motion for reargument. May I drop off a memory stick of documents to you in an envelop, for you to keep relating to the documents I filed, and Defendants' documents? I hope to get this done by Monday. I have not even started. If for any reason I am unable to hand you a memory stick on Monday, I will email you.

Please note in my answer I objected based on subject matter jurisdiction, and I have a case pending before the 3rd Circuit. (See attached).

I believe people go to hell for a lot of things. So I keep myself separate. I believe mental health and psychologists teach the mark of the beast as fact, conditionally caring based on relationship, reward and avoidance of harm as the goal, without unconditional love, chasing after desires and wants instead of laying down our desires to care to use our conscience mind to choose to do God's will, by critically thinking to care to know, to love.

I am a Christian. The bible teaches let the holy spirit be your advocate when you are taken to court. I should not be forced to go to hell, forced to compromise my belief in Jesus by undergoing examinations I object to, in order to maintain my license to practice law.

Thank you for understanding and I apologize that they appointed you when I do not desire assistance. Either way, we will need an extension of time.

My answer was 100 pages. I objected on subject matter jurisdiction because the Delaware Supreme Court appeared to participate or instigate in the retaliatory proceedings against me. So, the prosecutor must not be the judge and jury too.

I hope you have a nice weekend.

I will provide you with what I file on Monday too. Have a great weekend. Stay healthy and safe.

Very truly,
Meg

On Friday, December 17, 2021, 02:02:53 PM EST, Hutt, David C. <dhutt@morrisjames.com> wrote:

12/17/21, 2:44 PM

Yahoo Mail - Re: Board Case NO. 115327-B/Motion for reargument Counsel

Meghan,

Please see the attached letter with enclosures.

Thanks,

David

Morris James_{LLP}

David C. Hutt | Partner

107 W. Market Street, P.O. Box 690, Georgetown, DE 19947

19339 Coastal Highway, Suite 300, Rehoboth Beach, DE 19971

Phone: 302.856.0018 | Fax: 302.856.7217

morrisjames.com | dhutt@morrisjames.com

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Exhibit C

**BOARD ON PROFESSIONAL RESPONSIBILITY
OF THE SUPREME COURT OF THE STATE OF DELAWARE**

In the Matter of a Member of the Bar of the) Board Case No. 115327-B
Supreme Court of the state of Delaware) Misc. 541
Meghan M. Kelly, respondent.)

**RESPONDENT MEGHAN M. KELLY'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 NOW, Dec. 31, 2021, respondent, Meghan M. Kelly, pro se, files this

Motion simultaneously with her memorandum of law in support of this motion, and hereby objects to and moves this court to enjoin the attendance of health or mental health professionals or alleged experts from reviewing any enclosures or attending any hearing or trial relating to this matter to observe or analyze me to render an expert opinion or expert report to be submitted as part of the record, as violating my religious exercise and beliefs under the First Amendment applicable to the State pursuant to the Fourteenth Amendment, Procedural Due Process and Substantive Due Process Grounds, and, under the Equal Protections Clause, applicable to her as a party of one, including the attendance of John D. Shevach, MSM, FACHE, FACMPE motivated by disdain by the state towards my exercise of religious belief, speech, petitioning of grievances, association or utter poverty,

and, or, their requirement that I violate my religious beliefs in order to defend my government license to practice law.

1. On or about December 18, 2021, I objected to ineffective service of the Notice of Hearing, objected to the appointment of counsel, and moved the Board to postpone the hearing to allow for discovery so I may have opportunity to gather information to safeguard my protected constitutional exercise from threats to my person and to my license to practice law, but for the state's retaliation against me by bringing this petition for my exercise of First Amendment rights, by sending my objection to the Board via First Class mail, return receipt. (Exhibit 1)

2. On or about December 21, 2021, the Board received the December 18, 2021 filing. (Exhibit 2).

3. On or about December 24, 2021, I received Notice of the hearing dated December 10, 2021, in an envelope post marked December 21, 2021, two weeks after the notice, affording me little opportunity to respond to this urgent matter. (Exhibit 3). I reassert my arguments in Exhibit 2.

4. It is against my religious beliefs to be observed or examined by mental health or health professionals for the purpose of which is to render an expert opinion on my fitness to practice law. (Exhibits 4 affidavit).

5. The State seeks to punish me by declaring me mentally disabled in retaliation for my religious beliefs and exercise of Constitutionally protected

activity, which is quite insulting and poses a great danger to my person, in addition to a substantial burden upon my exercise of Constitutional liberties. "Retaliation by public officials against [my] exercise of First Amendment rights is itself violation of the First Amendment." *Zillich v. Longo*, 34 F.3d 359 (6th Cir. 1994), U.S.C.A. Amend. 1.

6. I have been threatened with physical harm but for my religious, political beliefs. A stranger talked about shooting me based on the stickers on my vehicle reflecting my religious-political beliefs. (Exhibit 5, discusses a threat to my safety, and provides examples of how mental health and physical exams violate my religious beliefs) (Exhibits 6, 7, 8, referred to in Exhibit 5, District Court Complaint which discusses healthcare objections)

7. In April of 2021, an out of state man from Maryland got in my face in BJ's, located in Millsboro for his assumption of my political associated beliefs, endangering me to covid 19, during a global pandemic. A young man came to my defense and asked if this man was bothering me. The man walked away. I did not know how this stranger from out of state assumed to know my beliefs or association. I assumed it may be because I drafted proposed articles of impeachment and contacted all 541 federal congress people to support impeachment of former President Trump.

8. Declaring me mentally disabled, as punishment for my religious beliefs and for exercising my freedoms under the First Amendment, would create a substantial burden upon my freedom of speech, from government forced societal peer pressured attacks in the form of official name calling, demeaning my creditability, and diminishing my voice, and exercise of religious beliefs in the community, and preventing me from working, deeming me unfit to be a worker.

9. Declaring me mentally disabled would endanger my life from threats by those who believe people with diverse beliefs or who are declared mentally disabled people are unworthy of life or liberty by such official name calling, during these troubling times as murder and attacks based on religious and political beliefs in America have occurred in the United States in recent years.

10. Just because I do not believe the government established beliefs does not mean I am mentally disabled. None are free, and the Constitutional protection of rights is an illusion if the freedom to think and believe by the dictates of own conscience without government social, economic or physical attacks against our person or property for such exercise, is not respected, but instead is ignored by government agents and partners to bend our will to give into temptations of the state's forced conditioned, controlled will.

11. The Board must not force me to violate my religious beliefs in order to defend my exercise of Fundamental rights, the exercise of which is the subject

of this petition, by allowing a mental health or healthcare professional to observe or examine me to render an expert opinion or expert report to become part of the record.

12. I believe people go to hell for allowing mental health and health experts to diagnose humans like me, as specimens, instead of people capable of reflecting the image of God. I believe our healthcare and mental healthcare causes harm and damnation in hell. I believe more evil is done in healthcare and mental healthcare than any other industry even the military which violates God's commands. I took courses in college and proposed laws to improve care for patients, as opposed to exploiting them for profit. (Exhibit 8). The fact people did not know harm would result, or thought sacrifice of life was worth it does not remove the harm done or damnation in hell on the last day. Not knowing is guilt to God. There is evidence healthcare and mental healthcare harms. Exhibits 9, 10. Just laws that protect patients as opposed to rewarding profits for harmful care is the solution. Money is the problem not the solution. Exhibit 8.

13. The requirement the state must meet to compel me to violate my religious beliefs by allowing an expert to observe or examine me during a hearing to render an expert opinion or report, is strict scrutiny, which the state is not likely to meet. My fundamental rights are more important than any alleged interest the state proffers. 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, (“[I]t is no defense to urge that the religious practices here may be relatively minor encroachments on the First Amendment.”)).

14. Further, I am impoverished. Should any hearing be conducted, though I intend to file a motion to dismiss on lack of subject matter grounds at the conclusion of discovery, which will likely prevent such hearing, I object to having a Court reporter or transcription service for transcribing the hearing. If the hearing is conducting via zoom, there should be a method of recording the Zoom meeting without incurring any fees.

15. I object to any fees relating to transcription and any potential fees relating to experts as against my religion. Going into debt violates my religious beliefs. I believe it damns people to hell. Exhibits 7.

16. I also object to taking off the tape on any computer at a zoom meeting so you can see my face on safety grounds. My safety and privacy on the unsafe internet should not be subjected to threats for the convenience of my attackers or the State or the State’s arms or agents. I object to being examined by any mental health or health expert during discovery.

WHEREFORE, I respectfully request the Board:

1. Enjoin outside mental health and health care professionals from participating at any hearing relating to this matter for the purpose of observing, examining, or rendering an expert opinion or report concerning respondent's fitness to practice law to prevent government compelled violations of respondent's religious exercise and belief in violation of the First Amendment applicable to state agents pursuant to the Fourteenth Amendment.

2. Enjoining John D. Shevock, MSM, FACHE, FACMPE, a member of the Board of Professional Conduct of the Supreme Court of Delaware from rendering an expert opinion or report to be submitted, separately, as part of the record, and to further enjoin him hereby from discussing this matter with experts in order to gain an expert opinion or report outside of the proceeding to prevent Respondent's opportunity to cross examine, and in violation of the Procedural and Substantive Due Process Clause, and in violation of respondent's protected religious exercise, as a party of one, under the Equal Protections Clause applicable to state government agents pursuant to the Fourteenth Amendment, with no compelling interest more important than safeguarding petitioner's fundamental rights to justify knowingly, willfully violating respondent's freedom from government compelled forced violations of her religious beliefs.

3. Permitting Respondent to keep a cover a device during any hearing to block her image to protect her privacy and safety on the unsecure internet.

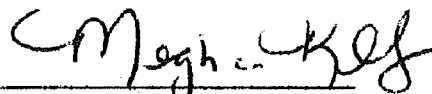
4. Moving the Board to consider recording the hearing without incurring costs, or requiring a transcription, via Zoom or alternatives, and if there is no possibility, the Board will waive transcription fees, or other costs upon indigent respondent as such costs compel her to violate her religious belief, including costs for transcription should she appeal to the Delaware Supreme Court.

5. Moving the Board to waive fees relating to transcription, any potential fees relating to experts, or other fees against petitioner, to prevent compelling her to violate her religious beliefs.

6. Any other relief the Board deems just.

Dated Dec 31, 2021

Respectfully submitted,



Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
Unrepresented indigent party,
Not acting as attorney advocate
Bar No. 4968
(Words 1,699)

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

Dated: Dec. 31, 2021

Meghan Kelly (printed)

Meghan Kelly (signed)

**BOARD ON PROFESSIONAL RESPONSIBILITY
OF THE SUPREME COURT OF THE STATE OF DELAWARE**

In the Matter of a Member of the Bar of the) Board Case No. 115327-B
Supreme Court of the state of Delaware) Misc. 541
Meghan M. Kelly, respondent.)

**MEGHAN M. KELLY'S MEMORANDUM OF LAW IN SUPPORT OF
HER OBJECTION AND MOTION TO ENJOIN EXPERT OBSERVATION
AND ANALYSIS OF RESPONDENT AT HEARINGS AND INDISCOVERY
AND NOTICE SHE WILL MOVE FOR A PROTECTIVE ORDER DURING
THE DISCOVERY STAGE**

AND NOW, Dec 31, 21, respondent, Meghan M. Kelly, pro se, filed a Motion contemporaneously with this Memorandum of Law in support of the Motion and hereby objects to and seeks to enjoin the attendance of health or mental health professionals or alleged experts from reviewing any enclosures or attending any hearing or trial relating to this matter to observe or analyze me to render an expert opinion or expert report, to be presented separately as part of the record, as violating my religious exercise and beliefs under the First Amendment applicable to the State pursuant to the Fourteenth Amendment, Procedural Due Process and Substantive Due Process Grounds, and, under the Equal Protections Clause, applicable to her as a party of one, including the attendance of John D. Shevoch, MSM, FACHE, FACMPE, motivated by disdain by the state towards my exercise of religious belief, speech, petitioning of grievances, association or utter poverty, and, or, their requirement that I violate my religious beliefs in order to defend my government license to practice law.

I. STATEMENT OF FACTS:

I filed *Kelly v Trump* in the Chancery, No. 2020-0809, Delaware Supreme Court, No. 119-2021, and the United States Supreme Court, No. 21-2021, to protect my free exercise of religion, speech, and association from government sponsored persecution for such exercise, and to dissolve the establishment of government religion by seeking to enjoin former President 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").

These executive orders allow money or support to be transferred between government agents and religious organizations. I believe the money or support in the bought, 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. Some things the government through its agents praise as good, I believe are evil and violate my religious beliefs, and cause emotional distress based on my religious belief the establishment of government-religion based on barter or exchange, not freedom, misleads people to harm and possibly hell for worshipping the beast sin, business greed, as Godly.

My exercise of speech in the pleadings based on my religious beliefs, are in issue. I believe the government through its agents violate the teachings of God misleading people to harm and hell by *inter alais* organized charity, partnerships with private entities, required pro bono, forced labor to receive welfare, using military to subdue the free will of others by the forced will of the government, and by rewarding ignorance bad business and business greed by allowing the powerful to delegate their duties, instead of correcting individuals within entities, and by eliminating individual liberties to protect collective interests of entities who have no power to do good. Only individuals may choose to do good by unconditional love. Entities with conformed, conditional interests run on conditional labor and money, and are not capable of doing any good by unconditional love. The

establishment of government-compelled religion forces me to be harmed and I believe damns many to hell for the love of money, merriment and material gain.

The State appears to create a situation that may force me to violate my religious beliefs, per the Notice of a hearing, including a heavily credentialed health care professional as a member of the jury who may possibly render an expert report or opinion, or the Petitioner may seek a mental or health care professional, despite having notice of my objections to healthcare and mental health examinations through observations or otherwise. Due to the severity of violations of my religious beliefs, damnation in hell, in addition to substantially burdening my religious exercise, I am filing this motion to prevent foreseeable harm with regards to compelled violations of my religious belief and damnation in hell. My religious beliefs are not a fairy tale despite the fact some people telling my faith is. One man, a friend, a pagan at my former gym, saw my God as a fairy in the sky. My faith in Jesus is more real than anything or anyone in this world to me.

II. STATEMENT OF QUESTIONS INVOLVED:

Per the letter by Office of Disciplinary Counsel Patricia B. Swartz to me , dated August 23, 2021:

[Her] Office has reviewed several pleadings [I] have filed in the Court of Chancery and the Supreme Court in connection with this lawsuit Meghan

Kelly v Donald Trump. The contents of the documents raise serious concerns as to your mental capacity and fitness to practice law.”

So, the State brings this action because they have concerns relating to my exercise of a fundamental right, petitioning of the court, to safeguard Constitutionally protected activity, my exercised of religious beliefs, and speech and association relation to that exercise from a substantial burden the Presidents caused, in part through enforcement of the above referenced executive orders.

On or about December 17, 2021, I mailed out a letter to the Board and Petitioner requesting postponement of the hearing. The Confirmation of receipt indicated the Board received the notice on December 21, 2021. I continue to respectfully request more time for discovery. On December 24, 2022, I received notice through the US mail for the Hearing scheduled for January 13, 2021. On December 30, 2021, the Delaware Supreme Court made a determination on counsel, permitting me to represent myself in this matter to safeguard my exercise of Constitutionally protected activity.

It is against my religious beliefs to be examined or observed by a health care or mental health care professional to determine my fitness to work, as if they are God. I seek to enjoin observations and examinations by the government to prevent the government from compelling me to violate my faith in Jesus by economic or other pressures, including the potential loss of the ability to buy and sell without

worship of the beast, business greed, the professional aim of marketing instead of rendering true justice by safeguarding individual liberties which would instill more respect in the courts by teaching the people even a peon like me, no wealth, no husband, no kids, no job, is deemed an equal in the eyes of the law to a powerful, well connected, wealthy individual, the President of the United States. The courts have the ability to teach no one is above the law and no one is below the law because the law is not for sale. I do not regret imperfectly trying to the right thing against all odds.

ARGUMENT PRELIMINARY INJUNCTION

A. Standard for a Preliminary Injunction

The test for the issuance of a preliminary injunction consists of four factors:

“(1) the likelihood that the plaintiff will prevail on the merits at final hearing; (2) the extent to which the plaintiff is being irreparably harmed by the conduct complained of; (3) the extent to which the defendant will suffer irreparable harm if the preliminary injunction is issued; and (4) [that] the public interest [weighs in favor of granting the injunction.” *Greater Phila. Chamber of Commerce v. City of Phila.*, 949 F.3d 116, 133 (3d Cir. 2020), *Citing, A.T.&T. Co. v. Winback & Conserve Program, Inc.*, 42 F.3d 1421, 1427 (3d Cir. 1994) (internal citations omitted) (quoting *Merch. & Evans, Inc. v. Roosevelt Bldg. Prods.*, 963 F.2d 628, 632–33 (3d Cir. 1992))

“In First Amendment [issues] the initial burden is flipped. The government bears the burden of proving that the [application of procedural] law is constitutional; thus, the plaintiff “must be deemed likely to prevail” if the

government fails to show the constitutionality of the [law's application as applied]". Id.

1. Irreparable Injury to Respondent and to the Public

If the Board denies my preliminary restraining order requested herein, Respondent and the citizens of the United States, will suffer irreparable injury 1. In terms of suppression of the fundamental right to freely exercise religious beliefs, or not, without fear of government persecution, or compelled violation of religious beliefs in violation of the First Amendment applicable to the state pursuant to the Fourteenth Amendment, 2. In terms of a license for government agents to create a substantial burden upon respondent's and citizen's right to petition the courts, and right to defend the exercise of petitions against claimants by government agents for the exercise of Constitutionally protected activity, in possible violation of the Due process or substantial due process clauses.

Irreparable injury is presumed with a loss of first Amendment freedoms, including the right not to be forced by government agents to violate one's own religious belief will likely prevail on the merits of this issue. *Elrod v. Burns*, 427 U.S. 347, 373 (1976).

Infringement of First Amendment rights are generally not compensable by money damages and are therefore irreparable. The harm noted herein, such as the freedom to worship or not according to the dictates of one's own conscience

without government sponsored persecution or forced violations of religious belief is certainly irreparable.

Any interest the state may have is not necessary to meet a compelling interest to force respondent to violate her religious beliefs.

2. The Merits of Respondent's claims for protection;

Given the fundamental rights at issue, and the requirement petitioner must prove are in furtherance of a compelling government interest, and the least restrictive means of furthering that compelling government interest that is somehow more important than my freedom to freely exercise my first amendment right to exercise my religious beliefs, I have a high likelihood of success on the merits of my claims.

3. Whether the harm towards the State outweighs the harm to respondent

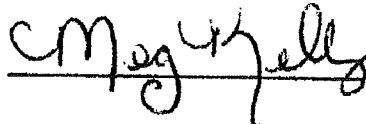
The State has no important interest or necessary interest in allowing an expert to examine or observe me for the purpose of determining whether my active license to practice law should be taken away as retaliation for my exercise of the right to petition, speak, associate and worship. I have not worked as a lawyer in over 6 years. I do not enjoy litigation. I hate it, but I love God, and am willing to do what I hate to uphold my ability to worship God without government incited

threats against me. My family is struggling during this global pandemic and economic down turn. I would like the ability to perform real estate settlements at my old law firm so I can afford to live and help them live. They will likely not hire me back should I be punished for the exercise of fundamental rights.

WHEREFORE, I respectfully request no mental health or healthcare experts be permitted to examine or observe me for the purpose of rendering an expert opinion or report as to my fitness to practice law.

Dated Dec. 31, 21

Respectfully submitted,



Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
Unrepresented indigent party,
Not acting as attorney advocate
Bar No. 4968
(Words 1,922)

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

Meghan Kelly (printed)

Meghan Kelly (signed)

Exhibit D

THE SUPREME COURT OF THE STATE OF DELAWARE
BOARD ON PROFESSIONAL RESPONSIBILITY
OF THE SUPREME COURT OF THE STATE OF DELAWARE

In the Matter of a Member of the Bar of the)	Board Case No. 115327-B
Supreme Court of the state of Delaware)	Misc. 541
Meghan M. Kelly, respondent.)	

**RESPONDENT MEGHAN M. KELLY’S EMERGENCY OBJECTIONS
AND EMERGENCY MOTION TO POSTPONE THE HEARING TO
PREVENT MANIFEST INJUSTICE TO AFFORD HER AN
OPPORTUNITY TO PERFORM DISCOVERY, POTENTIALLY CALL
WITNESSES AND PREPARE A DEFENSE FOR THE STATE’S
ILLEGALLY MOTIVATED PETITION AGAINST HER FOR HER
EXERCISE OF FUNDAMENTAL RIGHTS, MOTIVATED BY THE
STATE’S DISDAIN OF HER RELIGIOUS POLITICAL BELIEFS**

AND NOW this 1/11/22, respondent, Meghan M. Kelly, pro se, files emergency objections and emergency Motion with both the Board of Professional Responsibility for the Supreme Court of Delaware (“Board”), and the Delaware Supreme Court (“Court”), (Board and Court, collectively “Court”), simultaneously, to postpone the hearing against me to prevent manifest injustice to afford her an opportunity to perform discovery, potentially call witnesses and prepare a defense for the state’s illegally motivated petition against her for her exercise of fundamental rights, motivated by the state’s disdain for her religious political beliefs.

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.¹ 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.²

I believe experts are rendered above the law by adherence to controlled conformity across the board which stifles improvements by freedom of thought and speech, hindered by libel laws, and defense of adherence to professional standards, delegation of duties or ignorance.

I believe, fundraising, donations and government funding controls and limits what alleged experts learn, to serve lawless business greed not good, untamed by the rule of law or God's law of love. Our libel laws prevent free speech, debate and criticism to serve business greed. Defendants allege my belief in Jesus Christ is illogical, and compel me to conform to the world, when I am commanded to be set apart, holy, or risk losing my ability to "buy and sell" by taking my active license to work as an attorney, despite notice of my hope to regain a position at my

¹ (Dec. 29, letter, Exhibit A Part 2).

² See, D.I. US Ex., App E, Ex A-4, A-5, App. F, Ex. A, 1-8, 43, 46, 48, 50, 51, to App F, App H (Emphasis intended, See, *Jn.* 12:40, *Lk.* 11:34)

former law firm to help my family during this global pandemic and global economic crisis.³

I believe the State has also brought a petition against me in violation of the Equal Protections Clause of the Fourteenth Amendment because they demean me, motivated by my class of one, as an indigent Christian with individual, unconfirming religious beliefs, as unworthy to exercise other Constitutionally protected activity, not mentioned in its Petition, due to inability to buy or barter worthiness, to exercise fundamental rights compared to the President and others with money, power and connections to trade the ability to exercise rights.

I sought to run for the position of the President of the United States without compromising my religious beliefs in Jesus Christ. I did not know how wicked donations, organized charity, fundraising, organized conditional volunteering, gathering statistics on people for material gain, polls and collection of signatures was until after I ran for office, in 2018. I believe such activity misleads people to harm and hell. While people are free to live and believe by the dictates of their

³ *Rev. 13:17, Ro. 12:2, Nu. 23:9, Heb 12:14.* Work is not the sin. When your desire for money drives out your love for God and one another, at the cost of human sacrifice, harming others to serve greed, that is sin. The Free exercise Clause permits me to worship or not according to the dictates of my conscience no matter how unreasonable my religious beliefs may be to the state, not the forced worship of business greed, money and material gain by barter or exchange. My father needs a car. My parents gave me a car because they were ashamed of my ugly car when I ran for office. I no longer have my beloved ugly car. I love my parents more than material things, "moth and rust." (Mt 6:19-20). I want to give the car back and use my former firm's company car to perform real estate settlements.

conscience, the Free exercise clause protects my free exercise of conscience to worship by the dictates of my free will, uncompromised, without State interference and retaliation and punishment but for my exercise of religious belief.

The government compelled me to violate my faith in Jesus or waive running for President. I sought to run for Congress, and sought permission from the Democratic party, and the State, through the Board of elections. I was denied permission to exercise the fundamental right for an opportunity to run for office without compromising my belief in Jesus. I filed a lawsuit against the Democrats and the State to compel a waiver, but withdrew it when the pandemic arose. I sought to protect people's lives and health. I filed *Kelly v Trump*, when I realized eternal lives were at stake, my own and others, by the establishment of government religion.

I also filed various petitions, unmentioned by the State to government agents relating to my religious beliefs, which I believe may be an impermissible source of the State's suit against me.

I should be afforded a fair, reasonable opportunity to build a defense, to ascertain the reason for the petition against me. While it is true, only I can defend my belief in Jesus before the State, not an attorney advocate, but the advocate of

the holy spirit **reminding me** of his Word, I still require time and opportunity to defend myself relating to **secular reasons**, gathering the facts to uncover the truth.⁴

The trial against me is scheduled Thursday, Jan 13, 2022, two 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, as applied, and to show the state does not have subject matter jurisdiction against me.

I filed a letter Motion with the Board on December 18, 2021 to postpone discovery to *inter alias* afford me an opportunity to build a defense relating to my exercise of Constitutionally protected activity.⁵ I filed the same letter motion with the Board and the Court in a letter dated January 29, 2021, as an attachment.

Additionally, the Board and Court had notice of my desire to file motions prior to a trial-hearing.⁶ I should be afforded an opportunity to be heard on motions the Court was noticed I intended to file. The Court must not eliminate my

⁴ (John 14:26, “the Advocate, the Holy Spirit... will teach you all things and will remind you of everything I, [Jesus], have told you.); (Mark 13:11, “But when they arrest you and hand you over, do not worry beforehand what to say. Instead, speak whatever you are given at that time, for it will not be you speaking, but the Holy Spirit.”).

⁵ See **Exhibit A**, the attached federal court documents which explains reasons why the Court lacks subject matter jurisdiction. Regardless as to whether the Court had pure motives, concern for my poverty and hunger, reporting my petition concerning attorney dues to the ODC or arms, including DE-Lapp, but for caused the state’s lawsuit against me, incited the interference with my exercise of protected activity, and retaliation against me, for exercising rights.

⁶ See Motion for Reconsideration of the Court’s December 13, 2021 Order on appointed Counsel, despite notice of my objections to appointed counsel, and objection on the Board’s failure to provide notice of the Hearing on December 10, 2021. This was served on the Board and Court. (D.I. unavailable)

opportunity to be heard, and defend myself, in violation of the Substantive Due Process Clause, Procedural Due Process Clause, Equal Protections Clause, as applied to me, motivated by state actors' disdain for my religious-associated beliefs manifested in my petitions, speech and protected conduct or their decision that I am not worthy to have Constitutional freedoms based on my poverty, health and my refusal to worship business greed as God or as good.

I followed up with the Board on the status of my motion to postpone the hearing last Thursday, and again on Monday. Instead of providing me with an update, they waited until 01/10/21 to deny my motion, with no order, and demand a hearing be held. This places me in a terrible position of not having an Order to appeal. On 1/10/21, I refiled the 12/18/21 Motion, to prevent any argument it was not received by the Board due to the issues as to representation via their email, served on the state at the time of original service.

On or about 12/10/21, the Board failed to serve me with the Notice of a Hearing filed that day. On or about 12/13/21, the Delaware Supreme Court appointed counsel, despite notice of my objection to counsel based on my religious beliefs.

I objected to the hearing on grounds of not being served proper notice on December 10, 2021, and 2. not being afforded an opportunity to perform discovery to have a fair hearing.

I maintain my above referenced and incorporated by reference objections, and include additional objections on the following grounds.

1. Board's failure to allow me a fair opportunity to gather evidence, perform discovery, and research, under the facts of this case, to perform a defense against the state's claims against me for the exercise of my fundamental rights under the First Amendment applicable to the government under the Fourteenth Amendment, motivated by disdain for my religious beliefs, petitions, speech, affiliation, poverty, association as an attorney or other disparate treatment including perceived health,

2. Object on improper notice of the Notice of Hearing on the date notice was sent,

3. Object because my outstanding motion relating to postponing the hearing has not been answered, preventing an opportunity to be heard, by utter denial.

4. Object because the Court is aware of additional motions I intend to file before a hearing/trial, denying me an opportunity to be heard, by conducting a hearing/trial despite notice I seek the opportunity to be heard on motions prior to a hearing/trial, possibly preventing the need for one.

5. Object on the Board's delay in responding to my motion to postpone the hearing with an email sent, less than 3 days of the date of the hearing after I filed a number of emails concerning this request (Exhibit B),

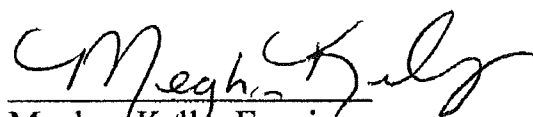
6. I object on procedural and substantive due process and equal protections grounds as applicable to me, a party of one.

7. I object to the decision not to postpone the hearing as unconscionable and creating manifest injustice, under the facts of this case.

Wherefore I pray the Court grants my motion.

Dated Jan. 11, 2022

Respectfully submitted,



Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
Unrepresented indigent party,
Not acting as attorney advocate
Bar No. 4968
(Word 1954)

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

Dated: 1/11/22

Meghan Kelly (printed)

Meghan Kelly (signed)

Exhibit B

Exhibit 1

Status of motion to postpone hearing/ Motion postpone/Bd 11537 B

From: Meg Kelly (meghankellyesq@yahoo.com)
To: patricia.schwartz@delaware.gov; karlis.johnson@delaware.gov
Cc: meghankellyesq@yahoo.com
Date: Thursday, January 6, 2022, 11:50 AM EST

Good afternoon,

I am following up on the status of the attached letter, which should be construed as a motion to postpone the hearing scheduled for one week from today, to afford a full and fair trial, including an opportunity to gather evidence, so as not to violate the substantive and due process clause, and an opportunity to use the evidence to present motions, including a motion to dismiss based on subject matter grounds.

Thank you,
Meg
Meghan Kelly
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
4968

Exhibit 2

Bd 11537 B / December 18, 2021 Motion

From: Meg Kelly (meghankellyesq@yahoo.com)

To: supreme_court_bprfilings@delaware.gov; karlis.johnson@delaware.gov; patricia.schwartz@delaware.gov; meghankellyesq@yahoo.com; zi-xiang.shen@delaware.gov; lisa.dolph@delaware.gov; david.weiss@usdoj.gov

Date: Monday, January 10, 2022, 02:03 PM EST

Afternoon your honor,

Please provide me with an order on my motion to postpone the hearing.

You confirmed receipt of my filings without specifying which ones. I am assuming all.

I am re-sending the filing dated December 18, 2021, my letter motion requesting the Board postpone the hearing, objecting to improper service on the date December 10, 2021, and objecting based on the fact I do not have a full and fair opportunity to prepare and conduct discovery for my defense.

You did not reject my document or send it back as unaccepted. I asked whether it was accepted. You indicated my documents were accepted.


If for any reason you argue this motion was not accepted, I am filing it to the E-mail you provided, already sent to opposing counsel via US mail on the original date attached hereto.


Please provide me with an opportunity to appeal to the Delaware Supreme Court, but I require an order first.


I do not think they will accept your email as an order. Albeit if in the interest of justice they do, I would be grateful.

Thank you for your time and attention to this important matter.

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

 Cert of service mailing Dec letter motion.pdf
52.2kB

 confirmation of receipt.pdf
119.5kB

 Dec 18 ltrr counsel discovery appeal time.pdf
207.7kB


 tracking ret rec Dec 18 letter.pdf
75.3kB

Exhibit 3

thank you/Dec 18 Letter missing

From: Meg Kelly (meghankellyesq@yahoo.com)
To: karlis.johnson@delaware.gov
Cc: patricia.schwartz@delaware.gov; meghankellyesq@yahoo.com
Date: Friday, December 24, 2021, 03:05 PM EST

Good afternoon,

Thank you for the letter received today, December 24, 2021.

I am in receipt of the dockets in the mail today. The Delaware Supreme Court did not give appointed Counsel all of the documents.

I am similarly concerned the Board may have accepted the CD I provided with my answers instead of the physical copies. I was not able to upload the documents on the CD completely or correctly with the threat counsel may be appointed before I provided answers.

I will work on scanning the answers to make sure your records reflect the physical documents. It may take me a few hours, and I may have to send them after hours or over the weekend. I also do not have the capacity to scan in large documents.

Should the Delaware Supreme court grant me permission to scan large documents at the law library, I would be grateful. The law library is able to scan about 100 pages at a time.

I saw your docket does not show receipt of my letter requesting postponement of the hearing until after I am afforded an opportunity to perform discovery, and after a determination is made on appointed counsel. I also provided the Board notice of my intent to file a Motion to object to appointed counsel, which you are in receipt of, in the attached December 18, 2021 letter.

The attached post office records indicate both you and Petitioner received the attached letter and certificate of service. It is likely you did not review the mail before you sent out the docket.

Thank you for providing the docket. I also received the Notice of the Hearing, dated December 10, 2021, in an envelope dated December 21, 201, received today December 24, 2021.

You are now 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.

I see the members have enclosures. I would like a copy of the enclosures they received emailed to petitioner and me. I understand that I may have to file a formal request. Given incomplete filings were given to David Hutt, I would like to confirm the record is complete.

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.

I also 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.

Thank you for your time and attention to this important matter.

Have a safe and healthy day.

Very truly,
Meghan Kelly
No 4968
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com






-  tracking ret rec Dec 18 letter.pdf
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-  Cert of service mailing Dec letter motion.pdf
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-  Dec 18 lttr counsel discovery appeal time.pdf
207.7kB
-  confirmation of receipt.pdf
119.5kB
-  Rec Dec 24 Notice of hearing w envelop.pdf
113kB

Exhibit 4

Automatic reply: thank you/Dec 18 Letter missing

From: Johnson, Karlis P (Courts) (karlis.johnson@delaware.gov)

To: meghankellyesq@yahoo.com

Date: Friday, December 24, 2021, 03:06 PM EST

I am out of the office and will return on Tuesday, December 28th.

Exhibit 5

RE: Postponed hearing/maintaining objections/ Bd 1157B

From: Johnson, Karlis P (Courts) (karlis.johnson@delaware.gov)
To: meghankellyesq@yahoo.com; patricia.schwartz@delaware.gov
Date: Monday, January 10, 2022, 12:31 PM EST

Ms. Kelly,

The Board plans to move forward with the virtual hearing as scheduled. A Zoom link will be sent via email later this week.

From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Monday, January 10, 2022 11:42 AM
To: Johnson, Karlis P (Courts) <karlis.johnson@delaware.gov>; Schwartz, Patricia (Courts) <Patricia.Schwartz@delaware.gov>
Cc: Meg Kelly <meghankellyesq@yahoo.com>
Subject: Postponed hearing/maintaining objections/ Bd 1157B

Hello,

Last Thursday I checked on the status of the hearing, maintaining my objection due to improper service, and required time to perform discovery to show 1. the state does not have subject matter jurisdiction, and 2. the proceeding is illegal as applied to me, motivated to punish me for Constitutionally protected activity.

I have not heard back from the Board or opposing counsel on the status.

The Board confirmed receipt of documents. I received no notice my December 18, 2021, letter was rejected or returned by the Board.

Please confirm the hearing will be postponed. I also would like to set aside time to have the vulture expert from the federal government come too.

I hope both of you and your loved ones are well. I am concerned sickness may be the reason for the delay in response.

Thank you,

Meg

Meghan Kelly

34012 Shawnee Drive

Dagsboro, DE 19939

meghankellyesq@yahoo.com

Acting as party not attorney advocate on behalf of another

Exhibit 6

Fw: Vulture problem/Federal government is helping/ Bd 11537 B

From: Meg Kelly (meghankellyesq@yahoo.com)

To: patricia.schwartz@delaware.gov; lisa.dolph@delaware.gov; karlis.johnson@delaware.gov

Bcc: meghankellyesq@yahoo.com

Date: Thursday, January 6, 2022, 12:50 PM EST

Good afternoon,

Per the message below, the government is helping me to prevent the buzzards and vultures from attacking my person. I am grateful.

Thank you,
Meg
Meghan Kelly
34012 Shawnee Dr
Dagbsoro, DE 19939
meghankellyesq@yahoo.com
4968

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

From: Michaels, Trevor A - APHIS <trevor.a.michaels@usda.gov>
To: meghankellyesq@yahoo.com <meghankellyesq@yahoo.com>
Sent: Thursday, January 6, 2022, 12:00:07 PM EST
Subject: Vulture problem

Good morning,

Your name and email was forwarded to us by DNREC in regards to vulture issues. We would be happy to assist with the issue if possible. It sounds like the use of a loaner laser or pyrotechnics (by one of our staff) may be the best course of action depending on the site layout. Would it be permissible to send someone out for a site visit to assist? If so, is there a day/time that would work best? Thank you,

Trevor Michaels

District Supervisor APHIS MD/DE/DC Wildlife Services

Chesapeake Bay Nutria Eradication Project

2145 Key Wallace Dr.

Cambridge, MD 21613

Office: 443-225-7430

Cell: 443-205-2726

Trevor.a.michaels@usda.gov

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Exhibit 7

thank you/Dec 18 Letter missing

From: Meg Kelly (meghankellyesq@yahoo.com)
To: karlis.johnson@delaware.gov
Cc: patricia.schwartz@delaware.gov; meghankellyesq@yahoo.com
Date: Friday, December 24, 2021, 03:05 PM EST

Good afternoon,

Thank you for the letter received today, December 24, 2021.

I am in receipt of the dockets in the mail today. The Delaware Supreme Court did not give appointed Counsel all of the documents.

I am similarly concerned the Board may have accepted the CD I provided with my answers instead of the physical copies. I was not able to upload the documents on the CD completely or correctly with the threat counsel may be appointed before I provided answers.

I will work on scanning the answers to make sure your records reflect the physical documents. It may take me a few hours, and I may have to send them after hours or over the weekend. I also do not have the capacity to scan in large documents.

Should the Delaware Supreme court grant me permission to scan large documents at the law library, I would be grateful. The law library is able to scan about 100 pages at a time.

I saw your docket does not show receipt of my letter requesting postponement of the hearing until after I am afforded an opportunity to perform discovery, and after a determination is made on appointed counsel. I also provided the Board notice of my intent to file a Motion to object to appointed counsel, which you are in receipt of, in the attached December 18, 2021 letter.

The attached post office records indicate both you and Petitioner received the attached letter and certificate of service. It is likely you did not review the mail before you sent out the docket.

Thank you for providing the docket. I also received the Notice of the Hearing, dated December 10, 2021, in an envelope dated December 21, 201, received today December 24, 2021.

You are now 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.

I see the members have enclosures. I would like a copy of the enclosures they received emailed to petitioner and me. I understand that I may have to file a formal request. Given incomplete filings were given to David Hutt, I would like to confirm the record is complete.

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.

I also 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.

Thank you for your time and attention to this important matter.

Have a safe and healthy day.

Very truly,
Meghan Kelly
No 4968
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com



tracking ret rec Dec 18 letter.pdf
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Cert of service mailing Dec letter motion.pdf
52.2kB



Dec 18 lttr counsel discovery appeal time.pdf
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Rec Dec 24 Notice of hearing w envelop.pdf
113kB

Exhibit 8

No counsel Fw: In the Matter of A Member of the Bar of the Supreme Court of the State of Delaware: Meghan M. Kelly, Misc. No. 541

From: Meg Kelly (meghankellyesq@yahoo.com)
To: lisa.dolph@delaware.gov
Cc: meghankellyesq@yahoo.com; patricia.schwartz@delaware.gov
Date: Wednesday, December 22, 2021, 05:48 PM EST

Hi Lisa,

I think you mistakenly thought I was represented by counsel. Per the attached, sent to you via mail, and the below email David Hutt agreed to respect my wishes.

In light of this, please put the motion on record, should any issues arise. Please note, the attached letter indicates briefing may not be required. It is seemingly moot but should be on the record.

Thank you,
Meg

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

From: Meg Kelly <meghankellyesq@yahoo.com>
To: David C. Hutt <dhutt@morrisjames.com>
Cc: Meg Kelly <meghankellyesq@yahoo.com>; Chris Calio <chris.calio@yahoo.com>; Chris Johnson <christopher.johnson@gmail.com>; Darin McCann <darin.mccann@coastalpoint.com>; Matthew <matthewkosiorek@comcast.net>; Glenn Rolphe <groffe@newszap.com>; Cris Barrish <cbarrish@why.org>; Liz Sillick <sillickliz@gmail.com>; Ike Adams <iadams@sidley.com>; E. Mark Braden Esq. <mbraden@bakerlaw.com>; Tim Mastrogiacomo <tmastro@gmail.com>; Aggie Kelly <aggiekelly@comcast.net>; dad <coachkellyrhrs@yahoo.com>; Mary Kelly <mbkpadefl@yahoo.com>; Mary Mastrogiacomo <marykmastro@gmail.com>; Cris Barrish <cbarrish@comcast.net>; Andy <andykelly@diveintoflood.com>; Amanda Gordines <mandygordines@yahoo.com>; Schwartz Patricia (Courts) <patricia.schwartz@delaware.gov>; Mckayla Braden <mckayla.braden@gmail.com>; Greg Layton <mispillionink@gmail.com>; Jeff Day <jday1632@gmail.com>; Chris Coons <andrew_crawford@judiciary-dem.senate.gov>; christie.mcdonnell@mcdonnelllawfirm.com <christie.mcdonnell@mcdonnelllawfirm.com>
Sent: Wednesday, December 22, 2021, 10:23:16 AM EST
Subject: Fw: In the Matter of A Member of the Bar of the Supreme Court of the State of Delaware: Meghan M. Kelly, Misc. No. 541

You are fired. I declined your representation. My poverty and my belief in Jesus Christ does not make me disabled. I already declined your representation. I am copying people for my safety.

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

From: Hutt, David C. <dhutt@morrisjames.com>
To: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Wednesday, December 22, 2021, 09:11:27 AM EST
Subject: RE: In the Matter of A Member of the Bar of the Supreme Court of the State of Delaware: Meghan M. Kelly, Misc. No. 541

Meg,

I do not believe that a person appointed by the Court in an ODC matter is required to also file an entry an appearance on behalf of the person they represent. The Court appointed them so there would be no need to also enter an appearance on behalf of the person being represented.

I reviewed your recent submissions to the Supreme Court.

I continue to believe that you would benefit from being represented by counsel in these proceedings. While I understand your position and strategy on the merits of this matter, I think there are additional or other strategies that you should consider or explore that may benefit you as you seek to maintain your license to practice law. I am happy to undertake those discussions with you.

That said, if your position remains that you would like to submit your motion requesting to remove me as your counsel, then I will do so.

I caution you in two respects and offer a further word of advice.

First, there is an age old adage, that he who represents himself has a fool for a client. Adages are what they are, but there is often at least a bit of wisdom in them.

Second, I'm not sure you can decline representation because, as I indicated previously, the declination of representation assumes that the person declining representation has the capacity to make a knowing, voluntary and informed decision.

Finally, if you haven't done so already, please consider speaking with a pastor, spiritual advisor or other counselor about your present course. It is always a good idea to consult with others and find out their thoughts on your view of defending oneself in a Court-like proceeding. I know several such pastors and advisors and would be happy to put you in contact with one of them.

Thanks,

David

From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Tuesday, December 21, 2021 8:42 PM
To: Hutt, David C. <DHutt@morrisjames.com>
Cc: Meg Kelly <meghankellyesq@yahoo.com>
Subject: Re: In the Matter of A Member of the Bar of the Supreme Court of the State of Delaware: Meghan M. Kelly, Misc. No. 541

David,

I declined your representation. You are fired in this matter, through no fault of your own.

They have not received the attached letter where I declined your services.

I need a docket of the Board matter. I have a right to the docket and need it for my lawsuit to enjoin the proceeding in federal court. I contacted the Board and made a request via email yesterday.

Do not make an appearance. What action if any have you taken in this case that I may not be aware of?

Thank you.

Meg

On Tuesday, December 21, 2021, 06:11:54 PM EST, Hutt, David C. <dhutt@morrisjames.com> wrote:

Meg,

Please see the email below and attached letters that I received from the Clerk of the Supreme Court this afternoon.

You will see that the Court rejected the document filed on Monday with the explanation set forth in the attached letter.

As you know, I am still relatively new to this matter and am working through the documents given to me by the Supreme Court, which appear to be ODC's Complaint and your Answer.

When I complete that review, I will let you know my thoughts on the best response and defenses.

Thanks,

David

Morris James LLP

David C. Hutt | Partner

107 W. Market Street, P.O. Box 690, Georgetown, DE 19947
19339 Coastal Highway, Suite 300, Rehoboth Beach, DE 19971

Phone: 302.856.0018 | **Fax:** 302.856.7217

morrisjames.com | dhutt@morrisjames.com

[Facebook](#) | [LinkedIn](#) | [Twitter](#)

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From: Dolph, Lisa (Courts) <Lisa.Dolph@delaware.gov>

Sent: Tuesday, December 21, 2021 1:59 PM

To: Hutt, David C. <DHutt@morrisjames.com>; Schwartz, Patricia (Courts) <Patricia.Schwartz@delaware.gov>

Subject: In the Matter of A Member of the Bar of the Supreme Court of the State of Delaware: Meghan M. Kelly, Misc. No. 541

Good afternoon. Please see the attached. Thank you.

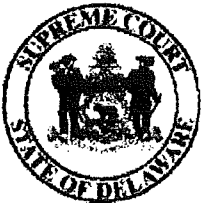
Lisa A. Dolph

Clerk of Supreme Court

55 The Green

Dover, DE 19901

(302) 739-4187



Cert of serv sent Dec 21.pdf
38.5kB



Letter representation rejected.pdf
105kB

Exhibit 9

Fw: Board 1153270/Docket/permission to email/In the Matter of Meghan Kelly

From: Meg Kelly (meghankellyesq@yahoo.com)

To: lisa.dolph@delaware.gov

Cc: meghankellyesq@yahoo.com

Date: Wednesday, December 22, 2021, 05:15 PM EST

Hi Lisa,

May I please have Karlis Johnson's email? I do not think Mason is the correct person, and I do not think she will respond to my response for the docket. Mark Vavala gave me her email, but she works for the ODC, not the Board of PR as an administrator or clerk like you. I think Karlis is the correct person.

Thank you for your help noting the urgency of this matter.

Thank you,
Meg

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

From: Meg Kelly <meghankellyesq@yahoo.com>

To: kjohnson@state.de.us <kjohnson@state.de.us>

Cc: Meg Kelly <meghankellyesq@yahoo.com>

Sent: Wednesday, December 22, 2021, 05:09:24 PM EST

Subject: Board 1153270/Docket/permission to email/In the Matter of Meghan Kelly

Good evening,

May I please have the docket for Board Case 115327-B emailed to me? Please be advised I am not represented by counsel.

May I please email you filings? I have been using the post office. It may be easier for staff who work remotely if I scan them when able.

Thank you. Have a good night.

Very truly,
Meg Kelly