

# Exhibit F

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**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 )  
Meghan M. Kelly, respondent. )

**MEGHAN M. KELLY’S ANSWER, DEFENSES, AND OBJECTIONS TO  
ODC’S PETITION TO TRANSFER MEGHAN M. KELLY, ESQUIRE TO  
DISABILITY INACTIVE STATUS**

AND NOW, this \_\_\_ day of November, 2021, respondent, Meghan M.

Kelly, pro se, answers, objects and identifies defenses to the petition, Office of Disciplinary Counsel (“ODC”) brought through its counsel, Patricia Bartley Swartz (“Patricia”), to transfer me to disability inactive status pursuant to Rule 19(c) of the Delaware Lawyer’s Rules of Disciplinary Procedure. (“PR”).

**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.**

**ANSWER:.** I incorporate the facts in the below related answers, and exhibits thereto, to the answer to this paragraph.

Admitted, in part. I am eligible to practice law, but have not practiced law for about six years.

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Denied in part, with regards to “Respondent is eligibility to practice law, with no restrictions.”

The ODC’s conduct and action has eliminated my *eligibility to practice law* with any law firm, and has caused a *restriction upon* my ability to continue negotiations with my former firm and has caused a restriction upon my ability to *practice law* with my former firm and other law firms. (Emphasis intended).

I was negotiating to perform real estate settlements with the law firm I left in 2016, before the pandemic hit, McDonnell and Associates, P.A., Attorneys and Counselors at Law, and the case *Kelly v Trump* arose in the Chancery court in September 2020. I still hope to rejoin my former firm to perform real estate settlements.

I do not enjoy litigation, but was compelled to litigate as a party in *Kelly v Trump* to protect my freedom to worship God without government incited persecution. I believe using words, not weapons of armed service members is the more powerful and effective way to safeguard our individual liberties and the security of our nation. I believe our courts through the individual judges may choose to be more powerful than a nuclear weapon, and more just, merciful and kind too. I hope the courts use their gentle power to reduce the religious violence in our nation and around the world. I have hope they may be our hero yet.

*Kelly v Trump* also prevented continued negotiations with my former law firm. By letter, dated November 1, 2021, the United States Supreme Court denied my writ of certiorari, Case Number 21-5521, available for public view on the Supreme Court of the United States web site, under the Docket Search function at <https://www.supremecourt.gov/docket/docket.aspx> See (Exhibit 1)

The ODC's conduct will likely prevent an opportunity of a life time, a position back at my old law firm, should the Board not dismiss this petition, based on the fact this proceeding is unlawful, unconstitutional as applied to me, a party of one, motivated by the ODC's disdain for my religious beliefs, and to punish and discriminate against me for the exercise of First Amendment freedoms, including the right to petition the courts, exercise religion, speech and association.

The evidence indicates the ODC may also be bringing this case to potentially cover up mistakes and wrong doing of government agents, or to discriminate against me based on poverty, as I defend First Amendment liberties requiring the ODC to meet the standard of strict necessary to burden my exercise of protected rights. The ODC does not meet such a burden. See Exhibit 2, 3, 4.

I object to this petition which has created a restriction on my ability to practice law, and a restriction upon renewed negotiations with my former law firm. This petition is brought to harass me and to harm my character and suppress my Constitutionally protected speech, religious exercise, association, First Amendment

right to petition the court for grievances, in violation of the First Amendment applicable to the ODC pursuant to the Fourteenth Amendment. The ODC through admission at paragraph 7, unlawfully bring this petition in retaliation for and in interference of the exercise of my protected rights, motivated by desire to discriminate against me for my religious exercise and beliefs I presented through protected speech and petitions.

The ODC's conduct, with agents, and coconspirators cause irreparable harm, causing me the loss of my First Amendment freedoms, and the loss of significant employment opportunity with my former law firm by deactivating my paid for active license to practice law, and other employment, and associated opportunities. Injury to reputation itself is not a deprivation of liberty or property. *Paul v Davis* 424 US 693 (1976); *Cf. Kelly v. Borough of Sayreville*, New Jersey, 107 F.3d 1073, 1078 (3d Cir. 1997); *Cf. Clark v. Township of Falls*, 890 F.2d 611, 620 (3d Cir. 1989)

I have a property interest in my paid for license to practice law to use not only to seek employment, but to bolster my ideas to persuade law makers to pass policies to care for humanity. I am not going to stop using my conscience mind to care about others by seeking to prevent harm or prepare folks for it, regardless as to what my future holds. The deactivation of my license and slanderous term disabled because I think for myself will diminish my voice. (See Exhibit 12,

Recent email to law makers to prevent an economic crash and an overthrow of our government, and attachments thereto, Exhibit 13, President Kennedy's executive order creating money without debt or interest to care for the people), (Exhibit 14, President Lincoln's executive order creating money without incurring debt or paying interest), (Exhibit 15, Email dated November 14, 2021), (Exhibit 16, an attachment thereto, a book written by the World Economic Forum founder outlining a planned elimination of the dollar, planned 47 percent unemployment of Americans by 2026-2027, elimination of jobs including journalists and lawyers and real estate brokers, as wealthy buy up land), (Exhibit 17, another book co-written by the founder of the world economic forum outlining schemes to overthrow the US as the hegemonic state, Exhibit 18, Excerpts of the book, *Creature of Jeckyll Island, a Second look at the Federal Reserve*, by Edward Griffin, 7th printing 1998, 3rd Ed., by American Media, to show the Great Depression was created unnaturally by the Federal; Reserve and other banks. This book appears to have the theory wars are instigated to create debt to create banks profit, and the environmental and biological concerns can do the same by unjust decrees that do not protect the environment and lives of humanity. Instead, unjust decrees such as fines and material rewards taken out of others pockets, create debt for bank profit by increasing desperate conditions. So wrong doers may get as much as they can get for as little as they can get without restraint in the form of just rules of law.),

(Exhibit 19, World Economic Forum article, *8 predictions for the world in 2030*, by Ceri Parker, dated November 12, 2016.)

The ODC also injures my reputation to discredit my petitions and speech, to hide government mistakes and misbehavior, substantially diminishing the magnitude of my speech and petitions to the courts for grievances against government agents related to my Constitutional rights.

The ODC requires I sacrifice my individual First Amendment liberties for the sake of an artificial entity without heart, the professional organization, which has no ability to do good by love since it exists on cold hard or electronic cash and conditional labor, not unconditional love. I am against Satanic human sacrifice of my individual liberties and the individual liberties of others to serve artificial entities without hearts who have no ability to do good. I believe the individuals within entities have the power to choose to do good by choosing to use their brains, their free will, also known as conscience mind, to think, to know, to unconditionally love others, even those with beliefs that conflict with the conditional beliefs of their organizations, by respecting the freedom of associates to disagree, even to be wrong, without condemning or retaliating against the individual. The individuals within the profession, and within organizations are stronger than the entities they associate with. I believe they can reflect the image of God by selfless unconditional love, unearned, by respecting the dignity of

others, even those with diverse religious beliefs that conflict with the conditional, conformed belief of the entity or association.

The ODC's position would have the Board recognize a right for the plurality by government authorized vote through the Preliminary review committee and the Board to eliminate, "and ignore the right of others, [including me] to worship in a different manner, or in no manner at all. [The Third Circuit held, a government authorized vote cannot] because 'the individual freedom of conscience protected by the First Amendment embraces the right to select any religious faith or none at all.'" *A.C.L.U. of New Jersey v. Black Horse Pike*, 84 F.3d 1471, 1477 (3d Cir. 1996); *Citing, Wallace v. Jaffree*, 472 U.S. 38, 52 (1985) (This relates to a student vote in a school concerning prayer).

The Third Circuit in *A.C.L.U. of New Jersey v. Black Horse Pike*, further held,

"Just as the right to speak and the right to refrain from speaking are complementary components of a broader concept of individual freedom of mind, so also the individual's freedom to choose his own creed is the counterpart of his right to refrain from accepting the creed established by the majority.

An impermissible practice can not be transformed into a constitutionally acceptable one by putting a democratic process to an improper use. There should be no question "that the electorate as a whole, whether by referendum or otherwise, could not order [governmental] action violative of the [Constitution], and the [government] may not avoid the strictures of [the Constitution] by deferring to the wishes or objections of some fraction of the body politic." *City of Cleburne v. Cleburne Living Center*, 473 U.S. 432, 448 (1985) (citation omitted). A policy that does this can not be legitimized by arguing that it promotes the free speech of the majority." *Id.* At 1477-78.



“Delegation of one aspect of (this petition to the plurality of the Preliminary investigative committee) does not constitute the absence of [government’s] control over [this unlawfully brought petition]” Id. At 1479.

I believe God does not force his will on us, but gives us freedom to choose his will, giving us freedom of conscience no matter the temptations to bend our will to the world’s will to worship the created instead of the creator, or to worship the lusts and vanities of life, money, merriment, and material gain. The ODC seeks to control me under the deception of order and aide, by seeking to eliminate my freedom of conscience by forcing the will of its professional entity upon me by essentially requiring I exchange my First Amendment freedoms, or renounce my exercise of those freedoms as a disability, in order to maintain my active license.

The ODC essentially requires I accept what I believe is the mark of the beast, also known as the whore, and the twice dead, children of the devil not yet adopted into eternal life as children of God mark, in order “to buy and sell,” as an attorney, compromising my faith in God, by making the profession a God, or something else my savior, such as money. I believe this compromise is whoredom with the world, adultery with God. (Citing, *Revelation* 13:16-17, “And the second beast required all people small and great, rich and poor, free and slave, to receive a mark on their right hand [by how they live] or on their forehead [by what they think about God’s will or the world’s], so that no one could buy or sell unless he

had the mark—the name of the beast (the sin against the holy spirit, hardness of heart, head and hands, absence of unconditional love, conditionally caring like easily misled through temptations, a.k.a. operant conditioning, like “blind and dumb” beasts, not humans reflecting the image of God)...”), also see, *Isaiah* 6:9, 6:10, 56:10, *Jeremiah* 5:21, *John* 12:40, *Matthew* 15:14, See also, *A.C.L.U. of New Jersey v. Black Horse Pike*, 84 F.3d 1471, 1482 n.9 (3d Cir. 1996), also see, (*Hosea* 2:4 “I will not show my love to her children, because they are the children of whoredoms [adultery].”); (*Hosea* 5:4 “Their deeds do not permit them to return to their God. For the spirit of whoredom is within them, and they know not the LORD.”), 1 *John* 3:10, “This is how we know who the children of God are and who the children of the devil are...”, *John* 8:44, “You belong to your father, the devil...”)

I believe that is a sin against God, and reflects the image of the devil for the ODC and Patricia to seek to bend my free will through temptations for me to give into government pressure to renounce my stance in separation of government and religion, my petitions, speech, association, and religious exercise or beliefs.

Perfection is not the standard for people to be protected under the First Amendment. I am still protected even if I made mistakes, and do not lose my ability to worship, petition, associate and speak. I am protected even if the ODC or the government believes I am wrong. Neither the ODC nor the government is

master and controller of our religious conscience, but are limited to the Constitutional restraints.

Unlike God who gives us choice, in *Isaiah* Chapter 14, Satan desired to be as high as God by controlling the world, by powers and principalities to tempt people to bend their will by conditional relationships, rewards and avoidance of harm to his desires out of pride, not love.

I believe government leaders should be servants, and encourage free speech, debate, disagreements, finding flaws to improve, in hopes to make society richer not only in material gain but eternal gain. *Matthew* 23:11. I believe people are the treasure government entities should protect, not exploit as commodities to use for material gain, which is all “moth and rust,” in the end. *Matthew* 6:19.

I did not agree to sacrifice my free will, freedom of conscience to believe in Jesus to accept what I believe is the mark of the beast, by the forced, trained, operantly conditioned will of the ODC to glorify the punishments of original sin, death under the guise of the pretty word martyrdom, child bearing, desire for your spouse, *work, or the fruits of labor* to reflect the image of Satan by pride.

(Emphasis intended). I believe the punishments for original sin outlined in *Genesis* Chapter 3, are not the purpose of life, but were given to us by God to teach us humility unto salvation. Yet, I believe many twist the scripture to behave like Satan to bend others' will to their desires, essentially making themselves their own

God, like Satan in *Isaiah* Chapter 14, seeks to make himself god in this world. (See, *Genesis* 3:1-3:7, and *Matthew* 4:1-4:11, to see examples of how the devil quoted scripture to serve the devil's will in place of God's will, under the guise of God's will.), (See, *2 Corinthians* 4:4, the devil is called the god of the world, who blinds the minds of people by distractions and temptations. So, they are not saved from being thrown into the fire on the last day at the resurrection of the dead from their graves for judgment).

I object to being forced to accept the mark of the beast to buy and sell, in exchange for my license to practice law. I object to the *restriction* the ODC has placed on *my ability to practice law* by bringing this unlawfully motivated suit. (Emphasis intended).

The ODC acts so to injure my reputation that I will lose significant employment or associational opportunities by the loss of my paid for, active license to practice law, including my ability to practice law in the state of Delaware as a result of Defendants malicious punishment based on their disagreement of my protected Constitutional exercise of religious beliefs, speech, association and/or petition(s), in violation of the First Amendment applicable to the ODC pursuant to the Fourteenth Amendment, should the Board not dismiss this case, as unlawful disparate treatment, as applied to me, in violation of the Equal Protections Clause of the Fourteenth Amendment

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

The ODC’s conduct also endangers my life by discrediting my pleas and petitions for relief as others have attacked me based on my religious associated beliefs and speech, threatening me with harm. The ODC similarly endangers others by seeking to set precedent to blind the eyes of those charged to administer justice towards victims petitioning for relief from harm based on religious and associated relationships and beliefs, guaranteeing injustice, not the protection of the rule of law. Should I be in danger, others will take me less seriously by the ODC’s label “disabled,” thereby increasing risk of harm and potential death.

I object to the ODC’s *restraint on my ability to practice law*. It was unlawful for the ODC to take action against me during an active case with intent to conspire with others to harass and interfere with my law suit, *Kelly v Trump*, obstruct my access to the courts or to demean my credibility, motivated to discriminately punish me for the exercise of First American freedoms, based on

disdain for my petitions, religious beliefs, speech, association or, and poverty. 42 USC Section 1985(2). (Exhibit 5, August 23, 2021 email. Note, the ODC refers to *Delaware Supreme Court pleadings* too, as the reason for their investigation. (emphasis intended).

The ODC had notice their conduct violated clearly established federal law. I told them. (See Exhibit 6, and Exhibit 7. Two emails I sent requesting the ODC desist in interfering with *Kelly v Trump*).

Interfering with my case, *Kelly v Trump* discriminating against me based on disdain for my religious beliefs, speech, petitions or affiliation, violates procedural and substantive due process protections to my unobstructed access to the courts to protect Constitutional freedoms, in violation of the First Amendment applicable to the ODC pursuant to the Fourteenth Amendment.

ODC and their agents knew or should have known it was against the law to pressure a party, me, to obstruct the case *Kelly v Trump* (“case”), harass me, or pressure me to forgo the case, and now to punish me for exercising the right to petition, speech, exercise religious beliefs and association, regardless of poverty, and license to practice law. Poverty does not eliminate Constitutional protections of fundamental rights, nor did I sell or waive my Constitutional freedoms in exchange for permission to maintain an active license to practice law within the state of Delaware.

There was no immediate need for the ODC to act, to humiliate, embarrass, upset and harass me during an active case, *Kelly v Trump*. I am no danger to the public as an actively licensed attorney, not currently practicing law or expecting to practice law on behalf of others. I have been holding off on contacting my former law firm until the pandemic subsides. I now must hold off on renewing negotiations until the issues in this petition are resolved. This petition is an unlawfully brought *restriction on my ability to practice law*, as discriminately applied. (Emphasis intended).

In *Kelly v Trump*, I merely defended my fundamental rights as an injured party, not as practicing an attorney. My ability to worship Jesus Christ and exercise my faith in God is the most important purpose of my life, more important than work, money and basic needs. I should not be compelled to waive fundamental rights, especially my ability to exercise my religion without government persecution, because of lack of resources attorney advocates need to perform their duties for others, as opposed to acting as a pro se, indigent party.

The ODC must not be permitted to compel me to choose between my license to practice law and my ability to exercise the right to access the courts, exercise of religious beliefs in Jesus, association or speech. Our Constitutional liberties are not negotiable by barter or exchange.

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 three times, 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, and most recently in November. See Exhibit 8.

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. (See, Exhibit 9, receipt). Preparing documents is especially tough for me with regards to not only funding, but lack of resources required such as paper, postage, gas, ink, and a working computer, considering my unemployment and utter poverty.

The ODC needlessly burdens me financially with intent to cause pressure to conform to their pressured will, instead of my free will to openly worship Jesus without renunciation, and to exercise protected rights.

I do not regret imperfectly standing up for my ability to exercise my religious beliefs without government incited persecution against me in *Kelly v Trump*, no matter how many typos or how imperfectly I stood up for Jesus.

I am not required to uphold the standard of perfection, or to be without typos or mistakes in order to be protected under the Constitution and federal law, regardless as to my professional status or my poverty.



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

The Courts and the Board have a duty to defend Constitutional liberties, including my liberties, above self-interest and their own appearance, allowing for humility, grace and internal correction and improvement.

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

The ODC is not above the Constitution and federal law. I plead illegality of this proceeding, as applied to me, and this case, brought with malicious intent to persecute me based on my religious beliefs, to obstruct my access to the courts and impede, impair and retaliate against me for my exercise of protected freedoms.

This proceeding is unlawful, as applied, and must be thrown out as a violation of 42 USC Sections 1985(2), 1983, 1988, the First Amendment applicable to the ODC pursuant to the Fourteenth, in violation of my protected religious exercise, petitions, association, right to petition, and in violation of the

substantive and procedural Due Process clause of the Fourteenth Amendment, motivated with malice towards me based on my religious beliefs.

The ODC seeks to suppress my speech by labeling me disabled, to prevent my ability to practice law. So, others will not take my petitions, speech, religious exercise, and association seriously and hear my speech. The loss and the threat of loss of my paid for active license reasonably also diminishes my eligibility to practice law.

The ODC's conduct endangers the public and the administration of justice by setting precedent, 1. if others think or believe differently than the forced, compelled, operantly conditioned, controlled will of the government or its agents by exercising their free will, also known as their freedom of conscience, 2. then they are endangered of being labeled disabled through official proceedings, preventing their eligibility to work or associate in a profession.

The ODC diminishes the free flow of my speech, ideas and chills my speech by retaliating against me because I believe differently than the government agents, as reflected in my association, speech and petitions, and, or my poverty. The ODC sets the precedent if someone in the public stands up for their religious beliefs in God, they may be removed from active participation in professional work by threats to deactivate their license. My religious belief and the religious beliefs of

others are not disabilities. No one is above the law. No one is below the law, no matter how repugnant the ODC may find my religious beliefs in Jesus Christ..

The ODC sets the precedent if someone is poor, unable to afford working computers or other luxuries, and attempts to exercise their First Amendment freedoms, they may be declared disabled, ineligible to practice in a profession, and possibly be put away for attempting to seek equal protection under the law.

I am not working and have not represented anyone but myself, as an attorney in years, and will not represent anyone anytime soon. Albeit should my former still be interested at any time, given my decreased marketability by this petition, I would take it.

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.

My former employer and I were discussing bringing me back on board in 2020, but the global pandemic and my petitions to the courts halted negotiations. When I last worked for my former firm, McDonnell and Associates in late 2016, my former law firm as a real estate attorney, my friend a Delaware Attorney, Dick

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

I recall people in the real estate section of the Delaware bar indicating there were title company addresses with no lawyer address to contact for deeds with errors, making the chain of title a problem for future buyers and sellers with no means to seek relief by an attorney who made such error. Since no attorney was on the deed.

I contacted the ODC in order to seek to prevent future problems and loss of tax revenue from the state of Delaware. Since out of state title companies do not pay taxes for attorney work, they unlawfully perform in Delaware. They seemed irritated that I asked them to save the state money and for help to correct problems in the chain of title.

I contacted law makers too, but no one helped me resolve the real estate issue.

I continued to seek to find a way to prevent the real estate title issues. A now retired Delaware Supreme Court Justice, Justice Holland kindly called me at my former law firm about the real estate title issues and offered to guide me on a

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

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

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

I sent so many comments to President Obama, he gave me a Christmas card, with an envelope spelling Delaware incorrectly, slanted left-handed.

I proposed more comments to lawmakers, but my computer recently crashed, and was wiped clean, including of my old passwords to different emails.

None of my comments to government leaders moved them to act. So, I decided to run for office in the 38th District for the District of Delaware in 2018, in an attempt to fix problems myself.

A local newspaper, the Coastal Point, kindly allowed me to draft an article relating to the title issues with a proposed solution to resolve the issues, and increase Delaware revenues without raising taxes, burdening the common man. (Exhibit 10, newspaper article in the Coastal Point to correct out of state title companies).

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

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

I even drafted proposals for five separate articles of impeachment to impeach President Trump on. I contacted all 541 federal law makers by email, fax, phone call, post card or letter, on my quest to uphold the Constitutional laws that make us free. (See Exhibit 11, five articles of impeachment I proposed to impeach former President Trump)

However, none of my efforts made a difference. So, I looked into running for President without violating my religious beliefs by asking for donations or

signatures, without buying or being bought with money, but seeking the seat based solely on the vote.

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

My religious beliefs were always at the forefront of my mind, but I sought a way I could be in a position to care for the people by creating just laws. I believe just decrees and justice in the courts is the solution, not money. The love of money, the security in money, teaching money is the savior is the problem, not the solution. I believe the love of money drives out the love for one another, and the love of God as savior, replacing money as savior, causing certain harm here and damnation in hell for eternity. I believe the courts have the power to be life savers and eternal life savers by valuing and protecting the dignity of individual people, unearned, required, as worth more than money and material gain. See *Amos 5:15*, *Matthew 23:23*.

I called the US Supreme Court regarding the issue, and a staff member kindly recommended I write the US Supreme Court a letter. I did write a letter, but the US Supreme Court was not able to respond as my issue was not ripe.

I kept contacting law makers to propose my ideas. They appeared to throw my proposals away, or did not read them, or sent me auto responses. So, I asked

the Democrats if they would waive the signature and fee requirements as violating my religious beliefs. So, I would not be forced to relinquish my first amendment freedom to exercise my religious beliefs in order to run for the US House of Representatives. The Democrats denied my request. I made the same request to the Department of elections, a government entity. They denied my request too, essentially requiring I compromise my faith in Jesus in order to run for office.

I gave up on aspirations to run for office when Covid 19 hit the world. Since I studied the history of medicine in a course at UD, I knew it would be serious. I did not want to endanger people's lives and health to merely gain a position to pass decrees that cared for the people as opposed to harming them to serve business greed and the love of money.

I was also communicating with my last law firm, negotiating coming back on board as a real estate attorney performing real estate settlements. I set aside talks not only due to the pandemic, but also due to the government establishment of religion that caused a substantial burden upon my free exercise of religion, by causing people to demean me as not a Christian, to insult me, and endanger me, and my exercise of my religion, speech and association without the protection of the Court.

The violence throughout the nation based on religion or political association is not normal and I believe we, I, needed someone to govern and guide our nation



with correction to prevent additional harm towards me and others throughout our country and the world. I hoped the Court would be our hero.

I filed *Kelly v Trump* to protect my free exercise of religion, speech, and association from government sponsored persecution for such exercise, and to dissolve the establishment of government religion by seeking to enjoin former President Trump and current President Biden from enforcing executive orders creating a union of government-religious entity 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 in the bought or bartered for, not free union of church and state is one reason why religious-political attacks seemed to have increased in recent years. 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, including churches, in other countries to perform government functions under the guise of charity.

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

Keeping religion and government separate reduces corruption between the two, and prevents the elimination of the First Amendment guarantees of free exercise of religion and the prohibition against establishment of compelled government-religion.

**2. Delaware lawyers have a duty to conduct themselves with conformity with the standards imposed on members of the bar as a condition of the privilege to practice law.**

I incorporate the above and below answers, and exhibits referred therein into this answer.

Admitted in part. Denied, as applied by the ODC towards me, a party of one. I object to the ODC's standards they seek to impose upon me, as violations of my First Amendment exercise of protected conduct.

The ODC's standards require elimination of my protected First Amendment rights, the right to petition, exercise speech, exercise religious beliefs and associate, without government obstruction and retaliation, by ODC and their agents' conspiracy to obstruct, impede and interfere in my case *Kelly v Trump*, and retaliation but for the exercise of my Constitutional freedoms. Such standards imposed upon lawyers, and upon me, are unlawful in violation of the First Amendment applicable to the ODC pursuant to the Fourteenth Amendment. Elimination of my free exercise of religion, freedom of conscience, free speech, First Amendment right to petition, and associate in exchange for a license is a cost too great.

Such standards imposed by the ODC are unlawful as applied to me under the First Amendment applicable to the ODC pursuant to the Fourteenth Amendment, and this proceeding is unlawful in violation of the same and in violation of the substantive and procedural due process clause of the US Constitution, as applied. The ODC is discriminating against me, motivated by their disdain for my religious beliefs.

The proceeding itself is also unlawful since the facts relating to the issue of this petition arose in the Chancery and **Delaware Supreme Courts**, and such court's conduct through its agents, and arms, including judges and staff are material to the case. (Emphasis Intended).

DE-Lapp's threatening letter arose, per my request to the **Delaware Supreme Court** to suspend attorney dues for lawyers facing economic hardship during the pandemic. (Emphasis intended)

The Delaware Supreme Court did not grant my request. Instead, I was retaliated against for making such request by DE-Lapp. It appears the Delaware Supreme Court or their agent instigated this retaliation by complaining to an arm of the Court since I made the request to the Delaware Supreme Court addressed to Chief Justice Seitz. My request was likely discussed with the other justices.

On or about January 7, 2021, I made a request to suspend attorney dues, for lawyers unemployed during the pandemic to the Delaware Supreme Court directed to Chief Justice Collins Seitz, Junior. (See Exhibit 20, Letter to Chief Justice Collin Seitz, dated January 7, 2021, seeking suspension of lawyer fees for lawyers unemployed during the global pandemic, and attachments therefore relating to negotiations with my former firm, who I hope will still consider me in light of this embarrassing petition.)

On or about February 2, 2021, the Delaware Supreme Court responded to my request indicating individual attorneys seeking a waiver of active attorney registration dues due to economic hardship or unemployment due to the pandemic must make an individual formal request. Exhibit 21

On or about February 6, 2021, I paid \$353.00 for my active attorney dues.

Exhibit 22.

On or about February 5, 2021, I responded to the Delaware Supreme Court's determination with Constitutional concerns about violating the Equal protections clause by deferring to the Court's instructions by submitting individual requests which would create disparate treatment of a similarly situated class of people.

Exhibit 23. I also requested that all lawyers pay the same fee, regardless of years barred. Id.

It is November 2021. I have not received a response from the Delaware Supreme Court regarding my second letter.

Instead, in April 2021, Judge Clark interrogated me at BJs and required I come to his chambers or talk with him by phone concerning my active law suit, inferring I was in trouble.

I was disappointed in him for violating federal law, pressuring me, a party to apparently forgo my law suit and exerting pressure to embarrass, harass or bend my free will to the forced conscience of the state.

I indicated I did not have a phone, and was too poor to pay for gas, and needed to focus on my case, which is true. Nevertheless, I was shaken by Judge Clark's misbehavior and interference. That is not what is expected of a judge

misusing the cloak of his authority and good reputation to exert undue influence to pressure me to forgo my First Amendment rights.

On May 24, 2021, De-Lapp sent a letter to me via E-mail only, appearing to create a threat of action, respond in ten days, stating, “Dear Meghan: We understand you may be experiencing some financial difficulties with regards to license fees...” Exhibit 24.

How did De-Lapp know of the letter I sent the Delaware Supreme Court unless the Delaware Supreme Court justices or their agents told them. Exhibit 24. The Justices did not grant me economic relief. So, it was not out of love and concern for me. Instead, it appeared to be concern and love of money, in the form of bar dues.

It is my religious belief that people will be thrown into the fires of hell on judgment day for allowing their love of money as their savior, to care for their family and business to drive their love for one another. When people value money, merriment and material gain more than humanity, I believe that is a reflection of the image of Satan, the mark of the beast, the mark of children of the desolate one, the devil.

I indicated the same to the Delaware District Judge with different words. Jesus teaches you cannot serve God and money, as master. I stand by God as

savior. I am a child of God, not a child of the devil, the desolate woman, the world. *Galatians 4:27, Isaiah 54:1-5.*

I am born again into eternal life so long as I remain steadfast to the end. *John 3.* Please note people can lose salvation, it is not an instance in the past. *Matthew 24:13, 2 Peter 2:21, Ezekiel 18:24, Ezekiel 33:13, 1 Timothy 6:14, Hebrews 6:4.* It is a constant choice to lay down human wants and desires for God's will, sacrificing our desires to love God and one another, not giving into temptation to merchants to the false God of money that damns the tempters and the tempted to harm and hell.

The Board and the Government is not required to believe as I do, or accept my beliefs as truth. The Board, the ODC and the Court is merely required to determine whether my beliefs are genuine religious beliefs protected by the constitution.

Obviously, I believe many acts and beliefs the government teaches misleads people hell without repentance such as military violence and threat of violence instead of using words. I also believe people will go to hell on the last day for organized charity, forced volunteering, pro bono which teaches the mark of the beast under the deception of true charity, violating *Matthew 6:1-5*, no matter how normal and routine it may be, and no matter the employees were merely doing

what they were told to do, should they not repent. Jesus teaches the will have no reward from their father, meaning no eternal life.

In *Matthew* 6:1-4, Jesus Christ says do not give seen. When you give charitable alms, do not know your left hand from your right, meaning do not give to get, no matter how small, including, trading favors, back pocket alleged good deeds, marketing, tax breaks, getting your foot in the door for a job, or the social aspect. All of these lead to harm, exploitation of those in need, and hell, by teaching people business greed is love, (the mark of the damned). Love is sacrificial, not getting, merely giving unconditionally. See, *Matthew* 10:8, "...You received without paying, now give without being paid." True charity is done in secret without reward, or it is not charity. It is just business. It is wickedly deceptive to say otherwise.

There is no shame in humbling yourself and asking for charity directly. I believe it is sin to ask on behalf of others under the guise of charity for self-gain, no matter how small, including praise of men and tax breaks. Organized charities and business fundraising violate Jesus Christ's teachings. I believe school children learn to go the wide way to hell through their unpaid child labor for corporate profit, by requiring they fundraise for sports, book sales, pizza sales, car washes, cupcake sales and activities, under the deception of charity. I believe they learn the mark of the beast, is love, giving to get is love. No, business by barter or



exchange, even for praise or forced peer pressure to fit in, is business, conditionally giving to get, not love. Love is unconditional. I believe all people should be respected unconditionally, unearned, regardless of race, religion or place of origin. Business is not the sin. I believe teaching business greed is love is sin. The bible teaches those who misunderstand go to hell, even children are damned to hell. See, *Ezekiel 9:3-6*, *Luke 17:2*, and *John 3:1-14* to confirm children go to hell on the last day too.

I believe churches mislead people to hell by asking for money from others to give to those in need under the guise of charity instead of obeying Jesus by giving from self in secret at a worldly loss, not giving out of one hand and getting out of the other, taking form others to hand off as charitable love from self. I think churches confuse the worldly secular function in the Book of Acts for distribution of resources to assist based on need as charity. That is not charity, but is governing.

Since I believe the US government teaches beliefs and conduct leading to hell, it is my religious belief the establishment of government religion under the guise of holiness is misleading people I love to go the wide way to hell under the false comfort of heaven. I believe the ODC is forcing even me to go to hell by requiring I compromise my faith in Jesus or face severe penalties, the potential deactivation of my license and the insulting label disabled but for my belief in Jesus.

If the government sins in its own name, it is a less heinous sin than to wrongly use God's holy name in vain for government gain. Our government leaders are fallible people who should also be afforded grace with correction and mercy.

It bothers me that the Bible teaches most people go to hell. Jesus teaches few people have eternal life. *Isaiah 10:22, Matthew 7:13-15, Luke 13:23-28*. I love people and so not want them to be thrown as sticks as fuel for the fires of hell to be no more. See, *Isaiah 10:19*. That is why I had a desperate desire to preserve not only my own free exercise of religion from government incited burdens, but I desired to also protect others from government religion that I believe damns. I love others and do not want them to be no more, without eternal life. So, I rushed to file my complaint against President Trump, believing perfection is not required in times such as now. Swift leadership is required. See Exhibit 25.

It is not ok for the government to mislead people to hell by bought and bartered for government religion. It is not ok for the government to punish me for seeking to protect and exercise my religious belief in God as God, not money as God. I am allowed to believe differently than the established government religion of business greed, the mark of the beast. Business is not the sin. The sin is allowing the love of money to drive out the love of humanity under the false belief money is the savior for all.

I am horrified by the establishment of government religion, teaching servitude to money, merriment, material gain leads to heaven, when it leads to giving into temptation to sin against the holy spirit by hardness of hearts, heads and hands, leading to hell. I do not want people to go to hell under the false assurance they will go to heaven. This deception damns. I had a fire in my belly to stop the deception the established government religion creates, per the attached Exhibit 25.

I do not regret standing up for my faith, my religious beliefs out of love for God and humanity, no matter how imperfect, poor, and emotional I am with regards to my faith in Jesus. I am fighting to protect souls from hell, people I love died, I believe to be damned for putting family first, putting immigrants down, and other perceived outsiders down, reflecting the sin against the holy spirit, hardness of heart.

I fight the good fight of love in truth, with words not weapons each day. Winning is not most important in this fleeting life. Followers of Jesus Christ appear to lose in this world. *Mark 13:13*, Doing the right thing is most important to God. God teaches that if we follow him, we will be persecuted here, hated here. *Matthew 10:17*, *Matthew 10:22*, *Matthew 24:9*, *John 15:18-21*, *John 17:14*. The world wants to do what it wants to do, not to lay down its desires to care to critically think, know, love. *John 3:19*. “[E]veryone born of God overcomes the

world.” 1 *John* 5:4. I may look like a loser before the world, but I have won eternal life so long as I remain steadfast to the end, remaining a child of God.

I believe we have a choice life or death, eternal life or damnation in the second death, without eternal life. *Jeremiah* 21:8. I choose life, not death by seeking the dollar as God.

Per the April 23, 2021, letter ODC sent, they also refer to Delaware Supreme Court pleadings as the source of their investigation. It is reasonable to infer the ODC or their agent may have gotten such pleadings from the Delaware Supreme Court.

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 these answers. Neither is the ODC. Complaints to ODC may have gone through agents of the Delaware Supreme Court.

I cannot call the Delaware Supreme Court as a witness in a case they preside over. Pursuant to *Federal Rules of Evidence Rule 605, 28 U.S.C.A. 605*, “The presiding judge may not testify as a witness at the trial.”

Additionally, the members of the Delaware Supreme Court are material witnesses to the facts relating to this petition.

Pursuant to 28 USCS § 455 (b)(1) (5)(iv),

“(b) [Judges] shall also disqualify [themselves] in the following circumstances:… (5) He:… (iv) Is to the judge’s knowledge likely to be a material witness in the proceeding.”

Here the Delaware Supreme Court knows the members are material witnesses to the facts that brought this dispute, the petition. See Exhibits 2, 3, 4, 5, 21, 22, 23, 24 incorporated herein. They must recuse themselves and are without jurisdiction. They cannot accept a waiver under this subsection b. 28 USCS § 455 (e).

Pursuant to 28 USCS § 455, (a),(b)(1):

“(a) Any justice, judge, or magistrate [magistrate judge] of the United States shall disqualify himself in any proceeding in which his impartiality might reasonably be questioned.

The Delaware Supreme Court’s impartiality might be reasonably be questioned as the facts evidence the Delaware Supreme Court 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 but for the exercise of protected freedoms, motivated to suppress my religious beliefs, speech and petitions.

Pursuant to (b) He shall also disqualify himself in the following circumstances:

(1) Where he has a personal bias or prejudice concerning a party, or personal knowledge of disputed evidentiary facts concerning the proceeding;”

The Chancery Court and Delaware Supreme Court members have “personal bias or prejudice concerning a party, or personal knowledge of disputed evidentiary facts concerning the proceeding;”

The facts related to the ODC’s petition arose in the Chancery Court and the Delaware Supreme Court (“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.).

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 Court and the Board are without jurisdiction for this unlawfully brought petition. A judge is not permitted to waive his or her disqualification under section (b) pursuant to

The Delaware Supreme Court does not have jurisdiction to hear this unlawfully brought proceeding, which the Board must dismiss.

I will face irreparable injury to my exercise of my speech, association, and exercise of religious beliefs by the government burden ODC seeks to cause upon me from such defamatory title, “disabled,” embarrassment, emotional distress, lack of future employment, harm to my reputation if the Board does not dismiss this proceeding as unlaw, as applied to me brought by ODC and agents of the courts in retaliation 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.

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.

The ODC and the Court agents knew or should have known that harassing, threatening, interfering with a party’s case, my case, motivated by disdain or animosity or disagreement with my religious beliefs, speech, petitions, association or poverty is a violation of the US Constitution and federal law

The ODC has exceeded the Constitutional bounds of the law in violation of 42 USC Section 1985(2), 1983, 1988, and the First Amendment applicable to the ODC pursuant to the Fourteenth Amendment.

Denied as it relates to the ODC's behavior as it relates to me. Defense of illegality. I object. Defendants knew or as attorneys, should have known violating my First Amendment rights by conspiring, harassing, interfering with a party in a case, me in my case, in an attempt to obstruct justice, and then punish me for exercising my first amendment rights exceeds the norms of a civilized society and violates the First Amendment applicable to ODC pursuant to the Fourteenth Defendant.

On an aside, the District Court Judge Connelly, cited the August 23, 2021 letter in his opinion against me, while failing to mention the Delaware Supreme Court pleadings the ODC cited in that same letter, the Delaware Supreme Court evidence indicating the Delaware Supreme Court or its agents appeared to have instigated the retaliatory proceedings against me based on the DE-Lapp's letter and requests for waiver of dues for lawyers out of work. See Exhibit 24 and Exhibit 32.

I am concerned when judges omit evidence to skew data, unintentional or not, misleading and deceiving the truth.

On an aside, I would like to think the Delaware Supreme Court through its members or staff contacted De-Lapp out of love and compassion for me based on my utter poverty and lack of resources. I think that the arms of the court went on vicious attack mode, not out of love, and improperly interfered during an active



case with threats, possibly under the mistaken authority of a Delaware Supreme Court. That is what may have caused the Court to be prejudiced to be hard on me, and may be the reason for the court's refusal to address my second letter relating to attorney fees. My law suit and petitions relating to Kelly v Trump were not brought with malicious intents. I brought the suit *Kelly v Trump* because I love God. I did not want to be substantially burdened to miss out on a fuller type of love with God on the last day due to government incited pressures to sin by hiding my faith in Jesus. And importantly, I did not want people I love to be misled by the establishment of government religion to sin and be damned without eternal life, to be thrown into the fire. I love God, myself and others, and do not want any of us to be harmed and damned to hell.

On November 18, 2021, I contacted Court agents to participate in CLEs. None even responded back to me, acting as if I was no longer an active attorney. I was not able to attend the free CLE. See Exhibit 33 and Exhibit 34 (Exhibit 34 reflects the reason why I believe most people go to hell. They allow their love of money to drive out the love for one another and God from their hearts, and merely conditionally care based on relationship, rewards and avoidance of harm, which I believe is the mark of the beast, those without eternal life, not yet born of love.)

This disparate treatment towards me based on my petitions, poverty, religious beliefs, association and speech should end. This petition should be

dismissed. I object to punishment for Constitutionally protected conduct. I should not be blackballed because I believe differently than others.

**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 inherent and exclusive authority to regulate and discipline members of the Delaware Bar.” *In re Abbott*, 925 A.2d 482 (Del. 2007) (Quoting, *In re Froelich*, 838 A.2d 1117, 1120 (Del.2003) 510 A.2d 484, 487, *Petition of Connolly*, 510 A.2d 484 (Del. 1986) (recognizing the Supreme Court’s “supervisory powers over the Bar.”). See also 10 De. C § 1906 and Procedural Rule 1(a).**

I incorporate my answers to the paragraphs above and below into this answer.

Denied, and I object to the jurisdiction of the Delaware Supreme Court (“Court”) and Board on Professional Responsibility (“Board”), as unlawful as applied to this petition in violation of Pursuant to 28 USCS § 455, (a) and 28 USCS § 455 (b)(1), and § 455 (b)(5). The Board and Court are without jurisdiction of this unlawfully brought action.

Denied and I object to the jurisdiction of the Court and Board. This petition must be dismissed. The ODC motivation is to discriminate against me for

exercising my protected rights, based on disdain for my speech, petitions, religious beliefs, affiliation or poverty, motivated by malice to suppress my religious associated beliefs based on disdain for my unpopular beliefs in Jesus's words, and based on the ODC's desire to hide government misconduct or mistakes by seeking to declare me disabled, in violation of the Equal Protections clause and the First Amendment applicable to the ODC pursuant to the Fourteenth Amendment.

I plead illegality as applied. This petition must be denied and dismissed.

Denied and I object and contest the PRC's and the Delaware Supreme Court's determination, based on the proceeding itself violating the Constitution, in violation of my First Amendment right to petition, speech, associate, exercise religious beliefs and petition the government for grievances without government interference and retaliation, motivated by malice to discriminate against me based on religious beliefs, exercise of rights, poverty and to cover up government misconduct or mistakes.

Denied, and I object, as applied to me in violation of the equal protection clause and First Amendment applicable to the Delaware Supreme Court ("Court") and the ODC pursuant to the Fourteenth Amendment as applied, against me, a party of one, based on illegality. This proceeding, brought under the color of the law, is brought for an unlawful purpose to discriminate against me for my exercise

of First Amendment protected rights to speak, exercise religious belief, and petition the government for relief.

This case is unlawfully brought against me to retaliate against me for the exercise of my First Amendment rights, based on disdain for my religious affiliated beliefs, poverty, and or to cover up court mistakes or misbehavior. Grace, mercy and justice for correction, not condemnation should be the Court's, Board's and the ODC's aim, not retaliation during a global pandemic where many of our loved ones are getting sick and dying.

This proceeding is unlawful, and should be dismissed.

The Supreme Court's conduct is in issue relating to this case, as well as the staff of the Chancery Court, and the petition before the board should be dismissed for this reason too.

Denied as applied to this case, in violation of 28 USCS § 455 (a), 28 USCS § 455 (b)(1), and 28 USCS § 455(b)(5)(iv). I object.

“Any justice, judge, or magistrate [magistrate judge] of the United States shall disqualify himself in any proceeding in which his impartiality might reasonably be questioned.”

(b) He shall also disqualify himself in the following circumstances:

(1) Where he has a personal bias or prejudice concerning a party, or personal knowledge of disputed evidentiary facts concerning the proceeding.

During the second week of November as I sat in the Sussex County Law library, Delaware Supreme Court Justice Traynor came in, and asked for jury instructions for the federal court, obviously to use against me or to help another person such as members of the Chancery Court to use against me.

The Judge cannot be the prosecutor, judge and jury too.

This act, and the behavior mentioned in the above and below answers to the paragraph create the impression of partiality by the Delaware Supreme Court. Thus, this petition should be dismissed since the Delaware Supreme Court is without jurisdiction.

Additionally the judges of the Delaware Supreme Court are material witnesses to this petition. I am not permitted to ask the judges or their agents did you tell ODC and DE-Lapp of my request for relief from attorney dues? Why have I not received a response since Februaray 2021? Or any other material issue relating to this petition. The evidence shows I am deeply prejudiced by the Court and petition, which was wrongfully brought. I sought safety and protection from the Courts, only to be punished for asking for help.

The Chancery Court was also without jurisdiction to issue equitable relief based on the fact impartiality may be questioned relating to facts in issue, same as the Delaware Supreme Court.

In *Kelly v Trump*, I suspected disparate treatment towards me by the Chancery Court based on religion, association, speech, petition and poverty in violation of the Substantive and Procedural Due process clause applicable to states pursuant to the Fourteenth Amendment, in violation of the First Amendment right to petition, associate, speak, exercise of religious beliefs regardless of license to practice law and utter poverty, and petitioned the Honorable Patricia Griffin for help. See Exhibits 26 and 27. The Honorable Master kindly afforded me relief. Exhibit 28, Exhibit 29.

A staff member sought to sabotage my case by misleading me to almost miss the filing deadline. Exhibit 2. The same staff member instructed me to cross off the civil process clerk's address, motivated by disdain for my religious associated beliefs reflected in the pleadings. Exhibit 4.

Exchanging first amendment rights for a license to make money, essentially selling my soul to hell, is not an exchange I am willing to make. My First Amendment right to worship God is not negotiable. I am a Christian and believe in God accessible through the father, son, Jesus Christ, and the holy spirit.

While I defer to the authorities, when Constitutional, I do not have to agree with them. They do not control my freedom in the form of freedom of conscience, no matter how they pressure me to conform to their forced will under threats of social, economic or physical harm. It is unconstitutional to bend people's free will, freedom of conscience to the worship of the false God, business professional greed, prestige, pride or other evil sin that mislead many to harm and hell.

To my horror, I realized it appeared the Delaware Supreme Court was the only source other than Mark Vavala who knew of my request, my petition to the Delaware Supreme Court to waive active attorney fees for all attorneys' unemployed due to the pandemic, which spurred De-Lapp's attack.

The ODC quoted the Supreme court pleadings as a source of their petition. Exhibit 5. It appears the Supreme Court may have instigated or assisted in the retaliatory interference by the arms of the court in response to my exercise of protected rights. This petition must be dismissed.

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 (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**

Denied and I object to examinations by medical experts, on religious grounds, and I object to paying for it based on poverty in defending my First Amendment liberties in this case, and based on religious grounds.

On Friday, November 6, 2021, around 6:00 PM, I was served this petition by the ODC seeking an order against me which would violate my faith in God by forcing me to undergo an examine me by a “qualified medical expert.”

Such examinations violate my religious beliefs. 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).

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.

Defendants also threatened to file a motion on November 8, 2021, to have an attorney appointed for me. I objected on religious grounds to the appointment of counsel and for costs too. I object and enter Denied herein for such appointment, and object to costs too.

Denied, unconstitutional as applied to me in violation of my religious beliefs. I objected to appointed counsel on religious grounds. 1. Going into debt violates my religious beliefs 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.

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.

My religious beliefs are different from the worlds. The Board and the Court does not need to adopt my religious beliefs to uphold my First Amendment freedom of conscience against Government substantial burdens, retaliation and exercise of protected rights.

My beliefs are in issue in this proceeding. So, I am properly discussing them. 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 I believe 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.) (*Luke* 10:25-37)

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. 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.

I believe children are trained, through psychology, 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, operantly conditioned pressure which is not unconditional love.

I do not celebrate birthdates since birthdates arose from ancient rulers declaring they became a God at ordination, and declared worship and celebration of self, like Satan, putting self first. *Isaiah 14*. The Romans extended birthday celebrations to commoners and even women, who took a day off to celebrate self, as if every person was their own God, which I see as blasphemy. So, I do not partake in conduct I see as dirty. I love and respect others who believe and behave differently. I just do not participate in what I see as sin with this world.

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 disabled. 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”). 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 the world, violating the covenant of God, the lost, the unsaved, those not yet adopted by God. Christians are known by their love. (1 *John* 3:10) 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. Thus they are tempted to 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.”)(See, *Matthew* 13:13, *Deuteronomy* 29:4, *Isaiah* 42:20, *Jeremiah* 5:21).

I believe 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 also believe people will be thrown into the fires of hell for carelessly recommending, performing or requiring healthcare examinations and healthcare too, should they not repent. I believe our healthcare harms health and kills patients. God teaches he will destroy those who destroy the temple of God, which is people, empty of the holy spirit or not. They are loved by God.

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 or their damnation is certain. 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, and those who ignorantly sell harmful healthcare. 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. 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. See Exhibit 30. I also proposed a way to transition into universal care. *Id.* Healthcare brings in more money than any other industry in the world, wrongly by 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. See, <https://www.worldometers.info/>. The second most lucrative industry is healthcare marketing under the guise of education, per worldometer.

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 at the resurrection of the dead.

I object. The ODC threaten me with the fires of hell by such examinations and costs. I did not exchange my eternal life for a license to practice law. I should not be forced to go to hell, violate my religious beliefs in order to maintain an active license to practice law.

Denied, as applied. I object. I am not currently practicing law, and there was no need for the ODC through its agents including but not limited to Judge Clark to use the cloak of the government authority, and color of law to impede, harass to pressure me to forgo on ongoing law suit on the most important issue of my life and eternal life, my ability to freely and openly exercise religious freedoms without fear or threat of government incited physical, social or economic persecution. My faith in God is more important to me than all the money in the world, and is more important to my than my license to practice law. I should not be forced to renounce my petitions and speech to protect my religious beliefs in order to practice law as the pandemic subsides.

Denied as applied to me, I object to paying any expenses relating to this petition, as I am in utter poverty and going into debt violates my religious beliefs.



I am impoverished and going into debt violates my religious beliefs forcing me to focus on money as savior instead of God. The Bible teaches "Owe no one anything but to love them." Jesus the Christ teaches you can not serve money and God. I believe people who make money their God allow unconditional love to be driven out of their hearts, replaced with conditionally caring based on relationship, reward and avoidance of harm, what I believe is the mark of the beast. I believe focusing on money as security in place of God, guarantees damnation in hell, without repentance.

Denied as ODC violates federal law and the Constitution, as applying this rule against me to force examination in violation of my religious exercise and beliefs pursuant to the First Amendment applicable to the ODC via the Fourteenth Amendment, brought with malice and disdain for my religious beliefs in retaliation for the exercise of my protected First Amendment rights.

Objection as to the manner of the investigation, and the unconstitutional purpose, the motive based on persecuting me for my religious exercise, and First Amendment rights. The ODC knew or should have known that interfering with an active case violates clearly established federal law. If the ODC had concerns, which I argue are not warranted, they could have waited until the case was over, instead of seeking to harass me or deny me access to the courts in violation of the procedural and due process protections under the Constitution and federal law.

Instead, they made themselves and the Courts look bad, since the ODC behaved badly by interfering with my case causing me to petition for help.

Denied as applied to me. I am no danger to the public.

Denied as applied to me. I have religious opposition to mental health and physical health exams, and I object to the ODC's

While it is my religious belief people sin against God for fundraising, and organized charity through churches or otherwise as it violates Matthew 6:1-5 and teaches people conditionally giving seen is unconditional love, I believe God teaches secular laws that provide welfare are required. Welfare helps those in need without exploiting such need to serve greed by corrupt bought, not free partnerships with private entities, such as not for profits, businesses and entities called charities.

I am so poor that I am on food stamps, which I should have applied for before the pandemic. And I only have about \$200 in my checking account. I am utterly impoverished.

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

Lord your God may bless you in all the work of your hands.” See, *Leviticus 23:22*, ‘When you reap the harvest of your land, moreover, you shall not reap to the very corners of your field nor gather the gleaning of your harvest; you are to leave them for the needy and the alien. I am the Lord your God.’” *Ruth 2:2-3* And Ruth the Moabitess said to Naomi, “Please let me go to the field and glean among the ears of grain after one in whose sight I may find favor.” And she said to her, “Go, my daughter.” So she departed and went and gleaned in the field after the reapers; and she happened to come to the portion of the field belonging to Boaz, who was of the family of Elimelech.” *Exodus 23:11*, “You shall sow your land for six years and gather in its yield, but on the seventh year you shall let it rest and lie fallow, so that the needy of your people may eat; and whatever they leave the beast of the field may eat. You are to do the same with your vineyard and your olive grove.” This allows the poor to pick up and gather the crops and sell them or use them for food.

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

Denied, and I object to such mischaracterization. The Court’s conduct towards me raised concerns. So, petitioned for help, not desiring condemnation against them, just protection from abuse under the color of the law based on malicious intent to suppress my first amendment exercise based on disagreement

with my religious, association, belief and speech and petitions and that reflected those beliefs.

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

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

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

The ODC intentionally retaliated against me for the exercise of my right to access to the courts, based on their disagreements as to my speech, religion and association, and beliefs, I seek to protect, even the right to criticize government officials, including Delaware arms and agents, and to stand up for my beliefs, no matter how repugnant the Defendants or others find my beliefs.

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

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

Arline indicated her support for former President Trump and for the ability of the government to share religious beliefs through its employees, by her communications at the courthouse and online. My case, *Kelly v Trump*, seeks to dissolve government-religion, which conflicts with Arline Simmons beliefs. Arline, intentionally misled me to almost miss the deadline to file an exception to the Honorable Master's final report, in an attempt to prevent my case from going forward based on her disagreement with my religious, political beliefs.

I asked the Master for help. She kindly helped me. Id. at December 1, 2020 letter, my request for help, and District Court Exhibit 11, the Master Patricia W. Griffin's kind December 7, 2020 letter granting me relief

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

I experienced foreseeable embarrassment, loss of sleep, clenching of teeth, tears, humiliation, hurt and emotional distress as a result of the intentional retaliatory interference with my case to stand up for my free exercise of religion, speech and association without government suppression, manifesting in sleepless

nights, which were rare to me prior to this case, clenching of teeth, pain in my heart, and tears at the betrayal of someone I cared about.

Arline also instructed me to cross off the address of the civil process clerk, the Delaware local counsel in *Kelly v Trump*, with the intent to prevent the case from going forward based on covering up her misconduct and based on her belief in Trump-religion, both in violation of my first amendment rights

My inability to serve the US Attorney General David Weis in the District of Delaware, caused great anxiety, confusion and distress. When I discovered the address crossed off, I became heart-broken because I still care about Arline outside of the court case.

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

Another Court representative Katrina Krugar indicated Arline and I should stop Emailing, and all communications should be done through Katrina's email instead, during these confusing times of covid 19. Arline and I both complied, temporarily as covid 19 continued to wreak havoc on the skeletal court staff that

held up the Chancery Court in person, and I filed a Notice of Exception to a Vice Chancellor, who works with different court staff.

In addition, the ODC impermissibly interfered with this case by contacting Judge Kenneth Clark, per Judge Clark's admission, to interrogate me as if I was on trial for exercising my right to petition the Court to safeguard my freedom to worship Jesus Christ without government incited persecution, substantially burdening my exercise of my religious belief. In April 2021, Judge Kenneth Clark ("Judge Clark"), a Court of Common Pleas judge for the state of Delaware judge appeared to threaten me at a local BJs in Millsboro, Delaware, a bulk grocery store, while acting under the color of judicial and state authority, as if I was on trial for standing up for my faith in Jesus, solely based on retaliation of my exercise of seeking judicial relief in court for petitioning the court to alleviate the government sponsored burden government-religion has caused on my exercise of religion in the action *Kelly v Trump*. It is improper and unlawful for state actors, especially judges to pressure a party in a case to drop, interfere or impede or prevent my access to the courts.

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

The Supreme Court's two-step Saucier analysis governs whether a government official is entitled to qualified immunity, considering: (1) whether the facts alleged by the plaintiff show the violation of a constitutional right, and (2) whether the right at issue was clearly established at the time of the alleged misconduct. *Werkheiser v. Pocono Twp.*, 780 F.3d 172, 176 (3d Cir. 2015)

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

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

“Congress, the Executive, and the Judiciary all have a duty to support and defend the Constitution.” *Salazar v. Buono*, 559 U.S. 700, 717 (2010); See, *United States v. Nixon*, 418 U.S. 683, 703, 94 S.Ct. 3090, 41 L.Ed.2d 1039 (1974) (“In the performance of assigned constitutional duties each branch of the Government must



initially interpret the Constitution, and the interpretation of its powers by any branch is due great respect from the others”).

I will suffer continued irreparable harm if this petition is not dismissed. ‘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)).

I will face irreparable injury to my exercise of my speech, association, and exercise of religious beliefs by the government burden ODC 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.

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. “A Government official's conduct

violates clearly established law when, at the time of the challenged conduct, ‘[t]he contours of [a] right [are] sufficiently clear’ that every ‘reasonable official would have understood that what he is doing violates that right.’” *Werkheiser v. Pocono Twp.*, 780 F.3d 172, 176 (3d Cir. 2015); Citing, *Ashcroft v. al-Kidd*, 131 S.Ct. 2074, 2083, 179 L.Ed.2d 1149 (2011) (quoting *Anderson v. Creighton*, 483 U.S. 635, 640, 107 S.Ct. 3034, 97 L.Ed.2d 523 (1987) (all alterations in original)). “In determining whether a right has been clearly established, the court must define the right allegedly violated at the appropriate level of specificity.” *Id.* Citing, *Sharp v. Johnson*, 669 F.3d 144, 159 (3d Cir.2012). The Defendants obstruction of my access to the courts and retaliation against me for seeking to petition the Court concerning civil rights is clearly violating my First Amendment rights to petition the court. “The opportunity to be heard is an essential requisite of due process of law in judicial proceedings” *Richards v. Jefferson County*, 517 U.S. 793, 798 n.4 (1996).

I wrote a letter to directed to the Honorable Chief Justice Collins J. Seitz, Junior of the Delaware Supreme Court (“Chief Justice”) under the suggestion of Mark Vavala, a former commissioner, and agent of the Delaware Bar Association, seeking a waiver of attorney registration fees during the pandemic, as the pandemic prevented me from working at my old law firm

“On February 2, 2021, the court sent a letter indicating:

“The Court acknowledges receipt of your letter dated January 7, 2021, wherein you request that the attorney registration fees for lawyers out of work due to the pandemic be waived. Attorneys wishing to have an assessment fee waived must file a formal request. The Court will take each request under consideration as received and act appropriately.”

On February 5, 2021, I responded to the Court’s February 2, 2021 letter in

part:

“...is accepting applications for waivers on a case by case basis violates the Equal Protections Clause applicable to the states agencies, even the courts via the 14th Amendment, disparate treatment within a class. I am likely not the only one out of work due to the pandemic. Others are struggling too. A case by case determination would likely be per se unconstitutional. I will likely never have standing to stand up for those similarly situated with myself. Yet, if I made such a request, I would be asking the Court to treat me with preference instead of impartiality as required by law. My conscience may not allow me to make such a request, tempting this Honorable Court to misbehave to serve my own gain. I can however, request that all fees for attorney registrations be the same regardless of years barred. So, I am making such a request for future consideration for 2022 and beyond. Please treat all lawyers the same by requiring the same lawyer registration fee for every lawyer, without persecution towards lawyers with more years of experience by an increased fee. There is no rational basis for an increase in lawyer’s fees based on number of years, except the desire for more money. It is wrong to assume the longer you have been barred, the more money you have or must pay. I am saddened when I see unjust decrees and policies based on the love of money, desire for money, at the cost of driving out the love for humanity, the people the state serves...” US Ex-Ex-A-5

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

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

In the May 24, 2021 Carol Waldauser and Eleanor Kiesel state, “We understand that you are experiencing some financial difficulties with regard to license fees.” They did not reach out to me to offer economic help since such fees were already paid, but to connive to gather evidence to retaliate against me, punish me, for my exercise of my first amendment rights. I made my request to suspend attorney license fees, the Delaware Chief Justice Collins J. Seitz, Jr. (“Chief Justice”). The Honorable Chief Justice may have discussed my letter with th other members of the Court, including judges.

I filed Appellant’s motion for the Delaware Supreme Court to reign in its arms through its agents unlawfully pressuring Appellant to forgo or impede her case to protect her free exercise of religion by relief it deems just, dated May 25, 2021, with the Delaware Supreme Court, with no relief from the Court.

It appeared the Chief Justice or a member of the Delaware Supreme Court contacted the ODC.

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

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

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

My speech concerning my beliefs and faith in Jesus may appear crazy to others, and yet even unpopular beliefs are protected. *Cantwell v. State of*

*Connecticut*, 310 U.S. 296, 60 S. Ct. 900, 84 L. Ed. 1213 (1940). Nevertheless, I have the freedom to believe by the dictates of my conscience, no matter what the government through its agents believes. See *Matthew* 6:1-5. Also see, *State ex rel. Tate v. Cabbage*, 210 A.2d 555, 557, 1965 Del. Super. LEXIS 67, \*1, 58 Del. 430, 433, (“It is no business of courts to say that what is a religious practice or activity for one group is not religion under the protection of the First Amendment. Nor is it in the competence of courts under our constitutional scheme to approve, disapprove, classify, regulate, or in any manner control sermons delivered at religious meetings.”); See, *Africa v. Pennsylvania*, 662 F.2d 1025, 1025, 1981 U.S. App. LEXIS 16448, \*1, (3d Cir.), cert. denied, 456 U.S. 908, 72 L. Ed. 2d 165, 102 S. Ct. 1756 (“It is inappropriate for a reviewing court to attempt to assess the truth or falsity of an announced article of faith. Judges are not oracles of theological verity, and the founders did not intend for them to be declarants of religious orthodoxy. However, while the truth of a belief is not open to question, there remains the significant question whether it is truly held. Without some sort of required showing of sincerity on the part of the individual or organization seeking judicial protection of its beliefs, the U.S. Const. amend. I would become a limitless excuse for avoiding all unwanted legal obligations.”); *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 682, 134 S. Ct. 2751, 2759, 189 L. Ed. 2d 675, 680, 2014 U.S. LEXIS 4505, \*1. (“Courts have no business addressing whether

sincerely held religious beliefs asserted in a RFRA case are reasonable.”); Employment Div., Dept. of Human Resources of Ore. v. Smith, 494 U. S. 872, 887, 110 S. Ct. 1595, 108 L. Ed. 2d 876 (1990). (“Repeatedly and in many different contexts, we have warned that courts must not presume to determine the place of a particular belief in a religion or the plausibility of a religious claim.”); *Presbyterian Church in U. S. v. Mary Elizabeth Blue Hull Memorial Presbyterian Church*, 393 U. S. 440, 450, 89 S. Ct. 601, 21 L. Ed. 2d 658 (1969) (holding that “the First Amendment forbids civil courts from” interpreting “particular church doctrines” and determining “the importance of those doctrines to the religion.”); *Ben-Levi v. Brown*, 136 S. Ct. 930, 934, 194 L. Ed. 2d 231, 235-236, 2016 U.S. LEXIS 991, \*10-12. See, *Holt v. Hobbs*, 574 U.S. 352, 352, 135 S. Ct. 853, 856, 190 L. Ed. 2d 747, 747, 2015 U.S. LEXIS 626, \*1, 83 U.S.L.W. 4065, 93 A.L.R. Fed. 2d 777, 25.

I am allowed to think differently instead of being conditioned to worship as the state’s forced will of materialism, pursuit of money, and unholy charity that damns people to hell per Jesus, such as fundraising or organized charity. Jesus teaches people “have their reward,” meaning they have no reward, no eternal life from God. *Matthew* 6:1. I believe organized charity, fundraising, pro bono, and volunteering is no small sin. It is not true charity, but damns people to hell by teaching business, giving out of one hand to get out of another, is love. Love is

unconditional. Business is not the sin. Teaching business is charity is the sin by driving love, God, out of the hearts of men replacing it with the love of money. Jesus teaches you cannot serve God and money. I choose God.

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

My personal beliefs and speech relating to those beliefs do not make me disabled. I believe people go to hell for trusting in what mental health employees and healthcare employees sell. I have religious objections to mental health care and healthcare.



I am a Christian. I believe people go to hell for trusting in what psychologists, mental health professionals, psychiatrists and behavioral theorists teach, which often is focused on being happy or productive materially instead of being holy. The organization premises its existence on mental health theories which I believe harm people. I believe such theories teach patients to seek to fulfill their own material desires instead of doing what is right, thereby teaching people to reflect a little piece of hell on earth, the image of Satan by living for self, conditionally caring based on relationship, reward and avoidance of harm with no sacrificial unconditional love or God in them, teaching a lie that damns. See *Isaiah* 14 to understand how Satan wanted to be his own God, as high as God, to place self-first. I believe their thinking misleads patients to hell, especially Bf Skinner's theories, which most teachers, including myself learned. These mental health professionals focus on misleading people to feel good, not be good, which is not good. I believe it is evil, misleading those they exploit for a paycheck to harm and hell.

Carol Walhauser created the appearance of a threat by her comment requiring a response within ten days. I have the freedom to chase after God's will instead of chasing after money.

I have the freedom to pursue my religion by justice in the courts to protect my freedom to worship by the dictates of my free will, not the forced will, not the

dictates of the state through its agents to worship money, as savior, which I believe leads to damnation in hell. I believe business greed, and conditionally caring based on relationship, reward and avoidance of harm, without any unconditional love, is the mark of the beast. Jesus teaches you cannot serve God and money. *Matthew* 6:24, 1 *Timothy* 6:10. I stand by God.

Psychological examinations, which violate 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.

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.

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.

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.

Where false accusations arise in retaliation for complaints against authority, reputations may be tarnished to conceal mistakes and misbehavior by those in power as the Board of Bar examiners did to protect their private partner at Widener Law School, and as the Defendants are doing towards me in retaliation for my petitioning the Court for relief. See, *Acts* 24:5, Paul was called a troublemaker for shining light on evil, on sins, just like Jesus was persecuted for shedding light on darkness, sins, in hopes to transform darkness into light. As I hope the courts choose to do in all cases, repenting when they make mistakes, reflecting the image of God by saving not only lives, but eternal lives too by love and correction to prevent condemnation, instilling hope "70 times 7." *Matthew* 18:22.

The government threats by Delaware government officials, Judge Clark, DeLapp, ODC, Patricia and the ODC 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.

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

Swartz, stating:

“This Office has reviewed several pleadings you have filed in the Court of Chancery and the **Supreme Court** in connection with the law suit Meghan Kelly v. Donald Trump. The content of these documents raise serious concerns as to your mental fitness to practice law... Therefore, the ODC requests you voluntarily submit to a mental health examination to determine your fitness, and mental capacity to practice law. This Office has scheduled an examination with Joseph C. Zingaro, PH.D., located at 1129 Airport Road, Milford, DE 19963 on Tuesday September 7, 2021 from 1:00 p.m. to 4:00 p.m. If you do not submit voluntarily to the above referenced examination, the ODC will petition the Board to order such an examination.” District Court Exhibit 21.

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.”

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.

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.

I filed Kelly v Trump 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.

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

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

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.

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.

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.

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. According to the US Supreme Court Docket relating to *Kelly v Trump* 21-5522, my petition was not even going to be

distributed for conference until October 29, 2021, the last business day of the month.

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.

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.

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”

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.

In the attached letter, dated September 27, 2021 Patricia and Defendant wrote:

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



I am sought relief from the Delaware courts for protection against government retaliation for my free exercise of religion, speech and association, only to my shock to be persecuted for the same by retaliation by the government agents for the exercise of my fundamental rights. This is a traumatic for me to ask for help only to be penalized, as a result of my petition.

The ODC, Judge Clark, and DE-Lapp's behavior would deter an ordinary, reasonable person from continuing their lawsuit, despite the fact it did not stop me, albeit it shook me up and caused me to rush with more mistakes.

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

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

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

I am firm on my belief in Jesus and the right to freely and openly exercise my faith without fear of government incited violence to my person, economic

harm, or social harm. I believe Courts are what keep many civilized, so long as the individuals within the courts look at people with love, not look at the price tag of cases or money. I believe Courts have the power to save lives and eternal lives through words of truth, guiding the misguided, with mercy, healing and hope, not condemnation. I believe the Courts are our hope of a hero in these troubling times.

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

The ODC, under the color of statutes and the law sought (seek) to deprive me of rights, privileges and immunities secured by the Constitution and laws, including my freedom to worship by the dictates of my conscience without government suppression and persecution, free exercise of association, free exercise of speech, and the right to redress government grievances in Court without outside government persecution by those wielding government power, and my active license to practice law. It is unconstitutional to conspire to impede access to the courts and to impair a fair trial, as the ODC has done.

The Defendants conduct seeking to place me on inactive disability status would prevent me from gaining employment with my old law firm or other firms,

causing irreparable harm to my reputation, my livelihood, and my quest to serve God by proposing just laws and policies to care for people, not exploit or oppress people to serve artificial entities without hearts who run on money and conditional labor, with no power to do good, as I believe only individuals can reflect the image

My personal religious beliefs are in issue. So, I am providing additional facts concerning my religion, and my beliefs. I am a Christian. I believe in God, the Father. I believe in God the son, Jesus Christ. I believe in God the Holy Spirit. I believe that God loves me and all of humanity so much that he reveals himself in three different ways, the Father, the son, Jesus, and the Holy Spirit, to shed light, to guide us to eternal life, regardless of whether we reject his love, in the form of his guidance to save us from the final death.

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

I find guidance in Jesus, the Word made flesh. I find guidance in the Holy Spirit. I find guidance in God, the father. I find guidance in the Bible.

Pursuant to the Bible, Jesus says, "The greatest among you is your servant." (Citing, *Matthew* 23:11). Accordingly, living to serve self is not great. In fact, I believe the root of corruption in both business and government is serving those

who serve you, thereby serving yourself, instead of the people you are supposed to serve. (Also see, *Matthew* 20:26 and *Mark* 10:43, Jesus says, ““whoever wants to become great among you must be your servant””); (Also see, *Luke* 22:26, Jesus teaches, ““But you shall not be like them. ... (T)he one who leads like the one who serves.”)

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 conditionally live for himself. He wanted to be his own God, to be as high as God. Satan did not want to lay down his life for God, by in part, loving others as himself, even outsiders, even the least of these.); (See *Genesis* 3:1-6, Satan tempted Eve to be like her own God too, allegedly “knowing good from evil,” to reflect the image of Satan, instead of placing God first by obeying God. God loves her and desired to prevent harm towards her. The command was for her benefit, like the commands are for our benefit to teach us the way through love to escape death. She died.); (Please see, *2 Corinthians* 4:4, and the *Book of Job*, Satan the lower case “god of this world” has authority to confuse humanity, through people, desperate conditions and the worldly desires, to teach people evil is good and good is evil. So, folks will be damned to hell for their misunderstanding.); (See *Matthew* Chapter 13, Only those who understood were not burnt up to be destroyed.

Misunderstanding may eternally kill you.); (Also see, *Matthew* 4:1-11, Satan tempted Jesus to live for self too. Jesus did not give into the temptation but lived to serve, God and humanity by being the light of the way to eternal life); (Also see, *Ezekiel* 16:49, People will be damned to hell for their unconcern "they did not help the poor and needy."); (Also see *Matthew* 13:18-19 "the worries of this life, the deceitfulness of wealth and the desires for other things come and choke the word, making it unfruitful," meaning those people will be burnt up in hell.); (Further see, *Luke* 17:26-34 where Jesus also gave us examples of people merely caring for their own family and their own needs, working, buying and selling, eating and drinking, marrying and given into marriage before they were destroyed to be damned to hell for giving into tempting distractions of making money and making merry, and, or the anxieties of life while failing to understand the true purpose of life and eternal life, loving God and loving others as yourself, not exploiting others, outsiders to serve your greed); (Also see, *Matthew* 7:21 "Only those who do the will of God, go to heaven.); (Also see, *Matthew* 16:24, *Luke* 9:23, *Matthew* 10:38, and *Mark* 8:34, regarding true followers must stop doing what they desire to do, and do what God desires instead. Loving others even if it is painful.)

I believe we are called to love those beyond our own even our opponents. (See, *Matthew* 5:43-78, *Luke* 6:27-36, and *Romans* 12:14-2, regarding loving your enemies. Also see, *Exodus* 22:21, and *Deuteronomy* 10:19.) 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. I believe the ODC sins against God when they look after their own interest, the interest of the reputation of the Delaware bar, or money, instead of the people they are charged to care for, including the bar, not exploit like products in a factory line. I believe people are priceless, irreplaceable, worth more than all the money in the entire world, not price tags.

I believe artificial entities without hearts, like the ODC, entity, per se, reflect the image of the devil, by absence of love, running on conditional labor, regardless of whether they are paid or not, or money, based on conditional collective entity interest with no power to do good by reflecting the image of God by unconditional love. People within the entities such as the ODC, are stronger than the conditional conformed will of the whole, since they have free will, to think, to care, to love unconditional, beyond the organizations', conditional existence, and conditional collective will, not free will.

The members within the such as the DOC, and Delaware Bar association have a conflicts of interest which tempts them to reflect the image of the devil by placing self-first, their collective, conditional uniform interests first, reputation of partners, the courts, their salary, their families, their colleagues, their convenience, or their reputation above doing what is correct by examining facts impartially, and

by intentionally or recklessly impeding my case with intent to obstruct my case and with intent to punish me for their disagreement with my speech, association, religious beliefs and requests within my petition, unlawfully violating the First Amendment applicable to Defendants pursuant to the Fourteenth Amendment. Satan wanted to be as high as God, not leading by sacrificing to self to serve God foremost and one another, as self. *Isaiah 14*.

Over the years, I have recognized that the members of the bar organizations sections tend to look at proposed laws with the mind set of what will be easier for lawyers, what will bring lawyers more money with less work, what gives lawyers more freedom, less regulation, instead of doing what is right by looking to care for the best interest of the people we are charged to serve upon acceptance of work, real estate settlements or cases.

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

consumers and the public outside of the standards, stifling free debate to improve, by the forced will of professional standards.

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

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

I am objecting to the ODC's investigations during my active case based on violation of clearly established law. Denying the statement in this paragraph, as applied. Objecting based on illegality, in violation of my First Amendment rights applicable to the ODC pursuant to the Fourteenth Amendment. Should there have been any legitimate concerns by the ODC, such investigations should have been conducted in a manner so as not to infringe with the exercise of my right to



unobstructed access to the courts, and without procedural due process, and substance due process violations, motivated by malice related to my religious exercise, speech, petitions, association and, or poverty.

**6. In September 2020, Respondent filed a lawsuit in the Chancery Court 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.**

ANSWER: Admitted.

**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).**

ANSWER: Denied, I object.

My faith in God through the father, Jesus, and the holy spirit are in issue my complaint *Kelly v Trump* relating to the former President Trump’s and current President Biden’s establishment of government religion causing a substantial burden upon my free exercise of religion under a RESPA action, and are in issue, as the motive, an improper motive to suppress my religious exercise, speech, association, and petitions of in the ODC’s petition before the Board Case No. 115327-B per ODC’s admission. At paragraph 7.

The ODC wrongfully brings this petition 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. They assert they “are objectively illogical; and rely on non-legal sources, including the Bible.” Other lawyers have properly cited Bible verse in religious cases to prove religious beliefs

as facts. I have lost the copies of the briefs evidencing this when my computer crashed on August 23, 2021. The ODC, the Court and the Board have no place to determine whether my beliefs make sense. They are required merely to determine whether they are genuine religious beliefs protected under the First Amendment. Object, irrelevant.

The US Supreme Court held, in *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*. (Emphasis intended).

Accordingly, the ODC and the Board have no business addressing whether my beliefs in the *RFRA Kelly v Trump* are reasonable. Also 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.”); *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.”).

The ODC and courts do not have to adopt my beliefs as true, but must merely ascertain whether my beliefs are genuine. It is improper for the ODC and the courts to find my religious beliefs of conscience illogical or not.

Additionally, I do have typos. I have had limited ability to access working computers and printers at the time, and had to print out what I could when I could, with typos and all.

I am bad at secretarial work like typing. Yet, I had to run to a print shop, staples and the library to get pleadings printed. Being a poor type writer does not make me mentally disabled or unfit to be a lawyer. I did not become a lawyer to push papers, but to push hearts to look at others with love.

With the limited resources I had, I made do under the circumstances. I believed swift leadership was required, not worldly perfection.

My compassion for humanity and ability to look at solutions, other than money, makes me a conscience reasonable thinker, not a controlled, conformed, conditioned widget for man to exploit for money and material gain.

**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.**

Answer: Denied, with regards to any legitimate concern regarding my fitness to practice law, as the proceedings are unlawful and are brought maliciously, in retaliation of my exercise of right to petition the courts, free exercise of religion, speech, association, motivated to discriminate against me based on religious beliefs, protected speech, First Amendment exercise of the right to petition, association and poverty.

Admitted that the ODC made a request on August 23, 2021, per their admission, based on review of information from the Chancery Court and the *Delaware Supreme Court*. (Emphasis intended).

**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).**

ANSWER: Admitted, and I emailed Patricia my US Supreme Court filings so she may confirm.

**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.**

Denied, I object. I pose no threat to the public. I am a helper by seeking just laws that care for people, not unjust laws which focus on money and jobs, which exploit people for self-gain, increasing desperate conditions instead of alleviate them, creating involuntary servitude.

I believe people will go to hell for teaching giving people a job is charity, love or good, when it is merely giving to get, even referring business to buy loyalty or favors. In Romans 4:4, God teaches "Now the wages of the worker are not credited as a gift, but as an obligation. Now to the one who works, wages are not credited as a gift but as an obligation. When people work, their wages are not a gift, but something they have earned." I believe people can be made clean and repent of sins that I believe damn them and those they mislead to hell like teaching business is love or charity.

I believe leaders should be servants that protect individual freedoms, without behaving like tyrants by seeking to control and bend the free will of others to conform to their controlled, operantly conditioned, trained not free will, under the

guise of order and aid or safety, essentially eliminating the freedom of conscience by compelled government pressure, making humanity less safe and less free.

I am not going to denounce my beliefs in Jesus, and I do not regret seeking to preserve the Constitutional freedom to worship or not by the dictates of my own conscience not the dictates of the government through their religious partnerships and incited agents. Doing the right thing is more important than winning and losing.

Denied, I object. Should I be placed on inactive disabled status but for the exercise of my fundamental rights, including but not limited to the First Amendment right to petition, speech, exercise of religion and association, the public would be endangered by such precedent. The public would be at risk of loss of first amendment freedoms and protections by similarly 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, eliminating the administration of justice and the rule of law, in exchange for government control under the guise of order and unconstitutional tyranny under the guise of aid and protection towards the public or respondents.

Denied, and I object. The public would be at a loss of my speech, association, potential representation, affiliation and ideas.



My unbending beliefs in Jesus and love for outsiders are unpopular with a large segment in the community, I am allowed to believe differently under the Constitution without government retaliation. My beliefs are not popular with Trump supporters and those condoning violence. I believe weak people use weapons, strong men use words and transform wrong doers into right doers, saving lives and eternal lives. It is scary down here in Sussex County. People are still talking about overthrowing the government and civil war. We need the courts to be our hero by the strength of the individual judges within the courts to guide the misguided with love, not fear and threats, but with correction and mercy. People down here really are confused between right and wrong. They do not need stern rebuke, but assurance their lives are valued and guidance to teach them to value and respect others unearned, required. We still need the Court to save our country, even if the judges within them think I am dumb and irritating. We need the Court to be a hero, even for those they do not like, even for me. It is scary down here. Someone talked about shooting me because of my religious speech, my stickers. Please help me. Do not retaliate against me just because you may think my beliefs are dumb.

The public would be at loss by such labeling me as disabled for merely thinking differently than the force fed commanded and controlled thought of

government agents. The fact I think for myself makes me reasonable and of sound mind, instead of unreasonably adopting beliefs, without critical analysis.

I have proposed ideas to prevent the loss of social security, prevent pollution, without throwing money at the problems, improve healthcare, prevent oil drilling and other ideas to care for humanity, instead of exploiting them out of concern for profit, which benefits the public.

I have stood up against lawlessness which is a benefit to society, by filing an ODC action against Justice Kavanaugh, filing a Complaint against President Trump who incited an insurrection to overthrow a Presidential election, while trying to substitute President Biden for President Trump, and by drafting 5 proposed articles of impeachment to impeach President Trump. My efforts support and uphold the administration of justice from lawless reign by those who abuse and misuse government authority, exceeding the bounds of the Constitution and the rule of law.

I have a good reputation for honesty and integrity, even by individuals with different affiliations and religious beliefs. See Exhibit 31

I also proposed ideas to reverse a planned economic crash or to prevent one should one arise.

In 2016, the World Economic Founder published a book, that outlines plans to eliminate the dollar, crash the US economy, causing a crash of the global economy to not only get out of the biggest bill falling due in the history of the world, the retirement and healthcare for the boomers globally, but to reduce to eliminate the protections afforded by the rule of law, replaced by control under the guise of order and aid of entities designed to exploit, not care for people. Exhibit 16, Citing *The Fourth Industrial Revolution*, by Klaus Schwab, 2016 version, excluding additional pages of the 2017 updated version published by Portfolio Penguin, which may be found at

[https://www.academia.edu/38203483/The\\_Fourth\\_Industrial\\_Revolution\\_pdf?fbclid=IwAR1koMak7N-40mbSf9wSGt8XzdhAJgafnbmobfn70FB4nbqcafl\\_hsN-RnQ](https://www.academia.edu/38203483/The_Fourth_Industrial_Revolution_pdf?fbclid=IwAR1koMak7N-40mbSf9wSGt8XzdhAJgafnbmobfn70FB4nbqcafl_hsN-RnQ)

Also see, Exhibit 17, *Covid-19: The Great Reset*, by Claus Schwab and Thierry Malleret, Portfolio Penguin Publishing, published 2020, by Forum Publishing, which may be found at

[https://carterheavyindustries.files.wordpress.com/2020/12/covid-19\\_-the-great-resetklaus-schwab.pdf](https://carterheavyindustries.files.wordpress.com/2020/12/covid-19_-the-great-resetklaus-schwab.pdf), ...

The past 4 presidents appear to be in the know of the plans contained therein, to eliminate the dollar, crash the economy, and remove the US's governing and guiding authority at home and abroad, essentially eliminating the rule of law

replaced with lawless lusts, since they attended the World Economic Forum's yearly meetings.

Please key search 47 percent, Control F. See, how by 2026-7 47 percent of the US will be unemployed by design. See, how the scientific and health and electronic proposals in 2016 near the back of the book, are realities today, specifically Zuckerberg's recent proposals. I suspect the inventions were already made in 2016 or earlier, but society is being controlled by operant conditioning by slow implementation of the 2016 written plans.

See, how lawyer jobs will be eliminated by automation, potentially courts too (lawlessness). Humans are special. I believe they can reflect the image of God by unconditional love. There is a trend to dehumanize and demean the intrinsic worth of people. I believe each and every person is worth more than all the money in the world. Part of my pleadings is the loss of my ideas and concern for the public by ODC's desire to chill my speech and demean my character so others will not take me seriously.

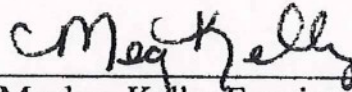
I also have reached out to the government concerning religious concerns before, which may be an additional source for the ODC's retaliation against me now. As irritating as my petitions may be, I am still afforded an opportunity to ask. There are no guarantees of justice. It is only the opportunity without

retaliation or interference, we must protect, the access to the courts for even the least of these, for me.

WHEREFORE, I respectfully request the Board dismiss the petition, enter an order denying the ODC's petition, dismissing the petition, and waiving costs as applied to me.

Dated November 19<sup>th</sup>, 2021

Respectfully submitted,



Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
Unrepresented indigent party,  
Bar No. 4968

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

Dated: Nov. 19, 2021

Meghan Kelly (printed)

Meghan Kelly (signed)