

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF MEGHAN KELLY'S 73rd AFFIDAVIT UPDATE

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

1. I am getting booby trapped by the US District Court Eastern District of PA and the Third Circuit Court of Appeals for No 22-3372 again.

2. Both the Eastern District Court and Third Circuit Court of Appeals filed my notice of appeal with the Caption Third Circuit attached hereto as Exhibit A and B.

3. Please note in the Email contained in Exhibit B, I forwarded an email where I specially noted:

"On Sunday, December 11, 2022 at 05:32:40 PM EST, Meg Kelly  
<meghankellyesq@yahoo.com> wrote:

Good evening,

Attached, please find the notice of appeal of the above referenced matter I sent this Court by placing the same in the US mail this Sunday, December 11, 2022.

I discovered errors as a matter of law after I had a brief time to research. **I also might be able to use this case to prevent third party or self regulation and end of life time limits which creates partiality to the regulations as opposed to the impartial rule of law.**

I gained more time to appeal two disciplinary orders before the US Supreme Court, but I require more time in this appeal to the Third Circuit.

The US Supreme Court is not instituting a disability proceeding per the attached order.

**I was hoping to use the Third Circuit Court of appeal's disciplinary order to argue against federal judge regulation, but I am getting slammed by another reciprocal suit where two motions were rejected last week.**

**Your case may allow me to make an argument if I included my Delaware motions against self regulation and third party regulation. I hope I did.**

Thank you. I hope you have a good week.

Very truly,  
Meg  
Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
(302) 493-6693  
Retired License 202268 PA  
Not acting as an attorney

4. I argued against regulating federal judges in this matter, and placed some, not all on the Eastern District of PA. Most arguments against regulating federal judges are on your docket not theirs.

5. Since the US Supreme Court currently allows District and Appellate Court judges to be disciplined or labeled disabled, and my Constitutional arguments against regulating the US Supreme Court judges also applies to all federal judges including ending term limits or preventing the eliminating life time appointments by members of the US Supreme Court to protect the impartiality of the courts, this lower Court may have a say should I be permitted to make arguments on remand should other arguments fail in the Eastern District of PA appeal. I believe you should have life time appointments not terms.

6. I see how congress and lobbyists will use the argument the US Supreme Court allows some federal judges to be regulated just not them when the Constitutional arguments against regulating you applies to all Federal judges.



7. Since, I have other arguments on why the rules are unconstitutional, unfair and partial towards the whims of the regulators it is possible for this Court and or the Upper courts to say Meg we do not like this rule regulating us and this is why or Meg your proposal is wrong and we hold this. This allows you to look at whether the rules governing you are constitutional or not; or at least allows me to appeal to the US Supreme Court to prevent arguments from Congress saying the court cannot make this argument for itself like a hypocrite and argue the Constitution does not apply to disciplining lower courts. It gives the US Supreme Court an opportunity to be heard on why the rules are different or whether I am correct and the federal judges should be ruled within the purview of the Constitutional rule of law without compelled involuntary waiver of the 5<sup>th</sup> Amendment right against self-incrimination. I am sorry if this does not make sense. I am digressing but I may have to file something soon with the US Supreme Court in the other matter because of the new booby trap laid in hopes to hoodwink me, but I am scared because the US Supreme Court could sue me too. I was thinking about asking them to allow me to appear specially or to create a new rule that allows lawyers appealing disciplinary orders to appear specially. That way, disciplined lawyers contesting orders are not sued by a partial forum, the US Supreme Court sooner by the fact they attach an order labeling them disciplined. It chills the First Amendment right to petition based on Constitutional defects and constitutional assertions of rights with no rational purpose other than to infringe citizen lawyers rights to the dictates of the government forum below, placing people at an unfair advantage especially since the burden is guilty until proven innocent even if the lawyer was denied the asserted for time to adequately prepare, research, subpoena witness which were denied, notice or present a fair case in violation of their 5<sup>th</sup> or 14<sup>th</sup> amendment right to procedural due process potentially making the order void. It is not fair that in a criminal-like matter citizen-lawyers are

rendered guilty until proven otherwise. That applies to judges too who will be attacked more in the lower courts too if the Supreme Court does not save you and itself in either of my two cases. I need to step back because I made arguments in the Kelly v PA ODC appeal too. I want it to dismiss the matter based on subject matter jurisdiction, not ripe to discipline me though.

8. Both the third Circuit and District Court were noticed I desire to prevent federal judge regulation. I learned District Court and Appellate Judges are under disciplinary and disability rules. Judge Scirica is chair of those rules.

9. I have filed more affidavits against regulating judges and have made more arguments in this case, though I attached some of those arguments onto the docket in the Appellate matter for the Eastern District of PA. Please see the attached Affidavit for recusal with some affidavits from this Delaware District Court I places on the Third Circuit Appeal, Kelly v Eastern District of PA, Number 22-3372 at Third Circuit Docket Item 49 and 50 at Exhibit B-2.

10. I am scared and write in haste. I drafted some potential questions, which need to be cleaned up with possible additions for the Eastern District Appeal and believe I must get things out even imperfectly than allow my rights to be waived forever including:

#### **“QUESTIONS PRESENTED**

I. Whether Meghan Kelly (“Kelly”) has standing to ask the US Supreme Court to prevent regulations or disciplinary rules binding the US Supreme Court and its members 1) to prevent the elimination of the impartial rule of law by the elimination of the independence federal judges require 2), to uphold the 5<sup>th</sup> Amendment Equal protections component as applied to Kelly as a party of one with her unique religious beliefs or exercise of religious beliefs against partiality in the courts and justice as a command by God in *Amos* 5:15, 3), to prevent compelled violations of her religious beliefs and 4) given the unique facts of this case, including but not limited to evidence Kelly provided plans to use standardization and regulations to eliminate people judges and people staff (as outlined in her Motion for additional time and record below in this case and her civil rights case) to eliminate the rule of law that restrains businesses from enslaving, oppressing, killing, stealing or destroying human life, liberty or health unrestrained by love written in the hearts of men or the just rule of law.

II. Should the Court deny Kelly First-party standing, whether Kelly has Third Party standing based on her special or close relationship with the right holder(s) the US Supreme court members and Federal courts to prevent regulations or elimination of life time appointments during good behavior given she is an active member of the US Supreme Court whose religious exercise of beliefs includes upholding the impartiality of the courts, she made arguments against regulating the US Supreme Court in this case and the right holder the members of the US Supreme Court or federal courts face obstacles to suing on their own behalf because they may not be the judge in their own case, but may consider the Constitutional rights violated by Congressional or self-regulation of its members or the federal judiciary not limited to such regulations creating courts that violate the 5<sup>th</sup> Amendment Equal Protections clause against partiality towards Kelly and other claimants by such regulations making the courts partial to the rules that control their judicial positions as opposed to the Constitutional application of the rule of law which protects Kelly's and other claimants Constitutional rights and claims.

III. Whether Congress or third parties may commandeer the court to draft disciplinary rules or obey rules in violation of their 5<sup>th</sup> Amendment right against self-incrimination by required incrimination through regulations that impede the federal judiciary's impartial application of the rule of law violating the separations of power, making the federal judiciary branch incapable of placing checks on the other two branches without the fear of reprisal or removal.

IV. Whether Congressional commandeering of the US Supreme Court to consent to incriminating rules by forced waiver of the 5<sup>th</sup> amendment right against self-incrimination violates the 13<sup>th</sup> Amendment against involuntary bondage to regulators by commandeering the court to the dictates of the regulators or forcing them to draft rules that will be used to incriminate judges in compelled violation of the 5<sup>th</sup> Amendment right against self-incrimination by government compelled forced not free choice.

V. Whether regulations and disciplinary rules standardizing the Federal courts or the practice of law impede and infringe upon Kelly's First Amendment exercise of religious belief, exercise of religious belief, association, speech, and petition in defense of Constitutional rights and other claimants whose exercise of fundamental rights do not conform to the standards.

VI. Whether we need people judges to uphold Kelly's exercise of First Amendment rights including but not limited to religious beliefs which do not conform to the majority or the standardized exercise of fundamental rights or whether automation or allowing nonjudges such as out of state title companies, banks, charities, churches, not for profits or businesses to be the judge of her and the people suffices.

VII. Can the Courts prevent nonlawyers from practicing law and non-judges from judging without government authority given no State or Federal Courts attorney disciplinary rules allow the US Attorney General, the State Attorney General or the Office of Disciplinary Counsel to prevent non lawyers and nonjudges from allowing entities or automation to replace licensed attorneys or sworn in judges, given Kelly ran for office because title Companies practiced law without a license, messed up on the chain of title, and took advantage of her deceased colleague Dick Goll, and it appears to continue and will get worse as Kelly believes real estate chain of title will assist in an

agenda to allow private entities to recoup resources to control the people and the government to eliminate the government if left unstopped by the courts.

VIII Whether we need unregulated people judges to uphold Kelly's Constitutional exercise of First Amendment rights contained in the speech in her petitions which do not conform to standardized religious belief, exercise of belief or religious-political association, since her religious beliefs are so unique they cannot be automated or boxed into standards.

IX. Whether eliminating life time appointments of US Supreme Court judges eliminates the impartiality of the judges by tempting them to be partial to who maintains, reappoints or otherwise controls their seats as opposed to the impartial application of the rule of law.

X. Whether Congress may commandeer the Supreme Court to draft rules requiring they waive the 5<sup>th</sup> Amendment right against self-incrimination, and possibly setting them up for **ex post facto** character evidence, despite good behavior, given disciplinary rules allow ex post facto evidence as to character and conduct in attorney and judicial disciplinary cases. So, there is a similar risk federal judges may be threatened and extorted to bend their will to the dictates of those who behave like mobsters by threats instead of using their minds in cases or controversies or impeachment.

XI Whether regulating federal judges, including district court and appellate judges, by disciplinary rules and requiring term limits makes federal judges partial to the regulations and those who wield the power to regulate as opposed to the impartial application to the Constitutional rule of law violating my religious beliefs as a party of one against partiality.

XII. Whether Courts must allow lawyers to correct judges and courts within the purview of the Constitution 1. in cases and controversies or 2. Impeachment without retaliation in order that the courts may uphold the constitutional rule of law and guide otherwise misguided parties "as to what the law is" to improve and uphold the administration of justice.

XIII. Where federal judges may only be corrected within the purview of the Constitution's limits of 1. Cases and controversies, and 2. Impeachment to preserve the Constitutional checks by the only branch that safeguards our Constitutional liberties from being sacrifice to serve fickle mob lusts through the vote by the other two branches.

XIV. Whether the Third Circuit abused its discretion in bad faith, in clear error of law, and clear error of fact as to cause manifest injustice against me by its orders dated June 30, 2023 in dismissing my case while simultaneously denying my motions for a stay, motion for time, motion to vacate an order limiting my motion for an extension of time to three pages given the voluminous reasons time is required and limit on filings under the threat of sanctions given my Motion for reconsideration of Order dated January 17, 2023, with regards denial of waiver of costs, to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, and compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights and invocation of the 13<sup>th</sup> Amendment, motion to correct the record given the lower court misfiled 1000s of papers

and placed another pro se claimants health records, and other motions, given the two orders deprived me of the Constitutional First Amendment right to petition under a motion for a rehearing under FRAP 40 on these orders and the order denying Kelly's motion to recuse Judge Scirica and Judge Phipps as to deprive me the opportunity to petition and fair opportunity to be heard in violation of procedural due process, denying my Motion to stay this case until the civil rights proceeding is concluded with no possibility to appeal, under the extraordinary circumstances where I face irreparable injury in terms of loss of private Constitutional rights, including but not limited to First Amendment rights to petition, speech, religious belief, exercise of religious belief, association, other claims and am threatened with potentially 6 needless additional law suits where my exercise of Constitutional rights face further restraint to :

1. Prevent loss of fundamental rights and claims in this case and the civil rights case,
2. Prevent potentially 6 needless lawsuits;
3. prevent duplicity of potentially conflicting decisions in parallel disciplinary cases and in this case and the civil rights.
4. prevent potentially needless unaffordable costs relating to duplicated litigation on the same issues from becoming a substantial burden upon my access to the courts, creating an obstacle so great as to deny me access to the courts to defend my license and exercise of fundamental rights, given my poverty and religious objection to debt, and invocation against involuntary servitude, especially given the original disciplinary order prevents me from working in the profession of my free choice
5. prevent a government compelled violation of my religious belief against indebtedness in order to exercise my right to petition the Court in defense of the exercise of fundamental rights and license(s) by increase in needless, duplicative material costs, time and lack of access or limited access to resources including research;
6. prevent government compelled involuntary servitude in violation of my asserted 13<sup>th</sup> Amendment right in exchange with access to the courts to defend my licenses and liberties from being taken away but for my religious beliefs in Jesus reflected in my speech contained in my private petitions,
7. prevent the risk of loss of my fundamental rights to religious belief, religious exercise of beliefs, political and religious speech, association and the right to privately petition to the courts to address grievances to safeguard my exercise of religious belief without state persecution but for disagreement with my religious-political speech contained in my petitions, before the Delaware Courts.
8. prevent the chilling of the exercise of First Amendment liberties by the public or other professionals who may fear reprisal in the form of the loss of their license or threat of character assassination b being deemed mentally disabled but for their exercise of individual liberties merely because the State disagrees with their First Amendment beliefs, or their petitions or their attempt to hold the government, including government agents of both state and federal government to the limits of the Constitution.

9. prevent harm to my health and life. My health has diminished. I require time to maintain my health and life, in light of my specific permanent weakness related to a past surgery in my youth, which Defendants and all courts in related litigation have been apprised of, even the Delaware Chancery and Supreme Court. Without time to accommodate my weaknesses my health will diminish further, jeopardizing my life. (Citing, US Amendments I, V, XIII).
10. Given there is a reasonable probability that four Justices will consider the issue sufficiently meritorious to grant certiorari or to note probable jurisdiction; (2) a fair prospect that a majority of the Court will conclude that the decision below was erroneous; and (3) a likelihood that irreparable harm will result from the denial of a stay.
11. The public, the Court and the Defendants are not prejudiced by a stay pending conclusion of the civil rights case.
12. In addition, in my other appeal and on the record below in this case, I indicate my belief the courts are in danger. I believe my appeal for the Third Circuit matter may stifle the plans to eliminate courts, before a far worse scheme is implemented. I must be afforded an opportunity to provide evidence of my belief. It is the mere opportunity to be heard I seek to protect not the guarantee.
13. The public is harmed if a stay is not granted.
14. The balance of the equities require a stay to prevent the loss of my fundamental rights because I had the courage to imperfectly defend them in the Delaware Courts.

XV. Whether considering the factors outlined in XIV above the US Supreme Court must grant a stay in this case, and whether this Court may reverse the decision to safeguard my First Amendment right to petition to prevent the irreparable loss in term so loss of Constitutional rights forever in the state of Delaware and other irreparable harm.

XVI. Whether this Court should resolve the split in the Third Circuit and Fourth Circuit concerning whether a claimant may appeal an order denying recusal of a judge prior to a final determination on the merits, in light of the dissent brilliantly distinguishing Supreme Court case Order on this issue at *Martin v Knox*, 112 S.Ct. 620.

XVII. Whether the Appellate Court abused its discretion in denying my Motion to recuse Judge Phipps and Motion for a rehearing to recuse Judge Phipps so as to deny me a fair proceeding in violation of the 5<sup>th</sup> Amendment right to procedural due process, given this reciprocal disciplinary law suit arises based on my Freedom Restoration Act Law suit against President Trump to alleviate a substantial burden upon my exercise of religious belief by dissolving a course of conduct I argued established government religion, when Judge Phipps was twice nominated to the US Supreme Court, I moved to recuse him in the civil rights case, the state's false allegations testified in his head without an opportunity to cross examine them in this separate suit when the temptation to rule against me with the very real prospect of a reward in terms of appointment to the US Supreme Court in light of the fact there is a high likelihood of a vacancy and Phipps' appointment in light of the threats and pressures to force justices to be impeached or retire tempting an ordinary person should they be placed in Phipps' position to be unduly prejudiced against me and for opponent, especially since President Trump is popular and



is likely to be reelected, and given Phipps' ruled against me in the civil rights case and this case.

XVIII. Whether the Appellate Court abused its discretion in denying my Motion to recuse Judge Scirica and Motion for a rehearing to recuse Judge Scirica so as to deny me a fair proceeding in violation of the 5<sup>th</sup> Amendment right to procedural due process, given he too ruled against me in the civil rights case, allowing a different parties testimony which I did not have the means to contest due to the threat of sanctions testifying in this case, and given I opposed Delaware Disciplinary rules and Delaware disciplinary proceedings on the record, which reflect the federal judicial rules Scirica drafts, and I seek to render those rules unconstitutional in both the civil rights case and this case, given the common person would be insulted and rule against me given I oppose Judge Scirica's rules and seek to overturn his hard work.

XIX Whether Justice Scirica or Phipp's participation violated due process rendering the orders they rendered void or voidable requiring the orders below be vacated. US Amend I, V.

XX Whether Third Circuit Court of Appeals abused its discretion by failing to file either of the two amended notices I filed in response to the August 7, 2023 order by Judge Diamond in the District for the Eastern District of PA Court filed in bad faith to increase costs needlessly as to cause me to forgo access to the courts as to deny me the First Amendment right to petition by preserving the record should the case be remanded or reopened essentially vitiating my Constitutional rights and other claims I seek to protect.

XXI. Given I filed an amended notice by mailing the same and emailing the same on August 7, 2023 to the District Court, which it did not file, but gave to the Third Circuit, wherein I never received official filed notice or a letter of rejection, when it is customary for Courts to send back rejected documents, just a verbal request from District Court staff to change the heading to Eastern District Court and they would file it despite filing my initial notice with the heading Third Circuit Court of appeals, when neither the Eastern District Court, nor the Third Circuit Court filed the first notice, and the Third Circuit indicated it docketed the notice by allowing me to file it, while setting up a booby trap by creating a new case Number where Solicitor appears to be opposing counsel to create the burden to my access to the courts my Amended Notice was meant to prevent vitiating the rights I sought to preserve should the case be remanded or reopened.

XXII. Whether the Third Circuit's denial of my motion to exempt costs, taxes and any other fee must be overturned in order not to violate my First Amendment rights to petition, religious beliefs against debt misleading people to certain damnation in hell by making mammon God in violation of Jesus Christ's teachings in Matthew 6:24, my invocation of the 13<sup>th</sup> Amendment, and my poverty making fees and costs obstacles to my access to the Courts below, and other courts as to deprive my of the First Amendment right to petition to defend Constitutional rights thereby vitiating my Constitutional rights and claims forever, especially my protected right to religious belief in Jesus Christ as God not money or material gain as God without government persecution.

XXIII Whether Kelly's Special appearance as capable of repetition yet evading review under current case law allows other lawyers to specially appear before the US

Supreme Court without fear disciplined attorneys' hope of a hero will be their attacker who will attack them more quickly under Rule 8 should they exercise their First Amendment right to petition attorney discipline orders on Constitutional defects or other Constitutional grounds, thus chilling the First Amendment right and other liberties of Citizen lawyers or whether the courts should create a new rule to safeguard Constitutional rights from citizen lawyers who should not be compelled to sell freedom for a license to buy and sell. See the Bible's reference referring this to the mark of the beast.

XXIV If this court seeks to discipline Kelly in response to her request for help whether they should place her license on inactive disabled in the Eastern District of PA Court to prevent its own court from initiating a law suit against Kelly, and prevent the initiation of 6 more needless lawsuits based on the bad faith of Appellant to render an order to get out of correcting over 2,000 pages of misfiled documents showing relevant information of Delaware or other reciprocating Court's mistreatment or condoning mistreatment of Kelly based on the her religious beliefs, place of origin, or exercise of Constitutional protected rights, including another pro se claimants medical exhibits, to prevent her from not having enough stamps, paper to continue this appeal, the appeal and hopefully remand in the civil rights case, and the appeal in Kelly v PA ODC so as to deprive her of 5<sup>th</sup> Amendment fair access to the courts to exercise her First Amendment right to petition to prevent the vitiation of her constitutional rights and other claims forever."

11 Yet there are so many more issues I reserved on the record below, and I am sacred.

12. Judge Diamond of the Eastern District Court of PA intentionally booby trapped me by not filing my notice dated August 7, 2023, without returning it while indicating it rejected the notice for filing as is customary.

13. The Eastern District of PA previously filed my original notice per Exhibit B where the top was captioned the Third Circuit Court of Appeals.

14. The Staff at the Eastern District Court requested I change the caption to Eastern District Court of PA instead of Third Circuit Court of Appeals in bad faith to create a different matter where solicitor General would be opposing counsel and the rights I seek to preserve on the record to defend would be vitiated should I fall into the booby trap laid out in full on August 24, 2023.



15. In an email to the court's case manager and judge with no opposing counsel in the matter I indicated the staff requested I file a separate amended notice of appeal without rejecting the first one or providing it back with notice as to why it was not filed and was otherwise rejected. The same court filed the original notice with the Third Circuit caption. The Court never sent back the amended notice I sent dated August 7, 2023, nor did the court send it back as rejected from its docket as is the normal course of rejecting documents.

**:From:** Meg Kelly <meghankellyesq@yahoo.com>  
**To:** Chambers of Judge Paul S. Diamond  
<chambers\_of\_judge\_paul\_s\_diamond@paed.uscourts.gov>; Gail Olson  
<gail\_olson@paed.uscourts.gov>  
**Cc:** PAED\_Clerksoffice <paed\_clerksoffice@paed.uscourts.gov>; Matthew  
<matthewkosiorek@comcast.net>; Naylor Margaret (Courts)  
<margaret.naylor@delaware.gov>  
**Sent:** Friday, August 11, 2023 at 05:48:04 PM EDT  
**Subject:** Fw: Confirmed Amended Notice physically received but not filed Re: 22-45  
Amended Notice of Appeal mailed out August 7, 2023/amended envelop/picked up by  
mail man from mailbox

Good evening,

Steve Tamos and Dan McCormick talked with me today. Staff of your Court kindly indicated they received the amended notice, but did not file it "because the caption had Third Circuit."

They gave it to the 3rd Circuit. A staff member of the 3rd Circuit confirmed they physically received it, but they did not file it. Unless I am mistaken, I think you must file it first.

Attached, please find an amended notice I sent today August 11, 2023, but will likely be picked up on Saturday. Attached to the notice is the order, and an exhibit of the previously sent Amended Notice and attachments with proof of mailing.

Also attached, please find a transcript and the envelop of today's mailing. I am pretty sure the amended notice sent August 7, 2023 was correctly drafted and filed similar to the amended notices or notices filed in my DE District Court appeal. The staff may very well have made a mistake since Gail Olson is out. Gail, please let me know if the first notice should be filed.

Thank you. Have a good weekend.

Very truly,  
Meg  
Meghan Kelly  
34012 Shawnee Dr  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com

My phone may not be working sometime next week. I still will have the same number but do not expect to have sufficient funds to keep the service on at this time. I must take each day one at a time. Thank you for understanding.

----- Forwarded Message -----

**From:** Meg Kelly <meghankellyesq@yahoo.com>

**To:** James Deitz <james\_deitz@paed.uscourts.gov>

**Cc:** Meg Kelly <meghankellyesq@yahoo.com>

**Sent:** Friday, August 11, 2023 at 03:12:02 PM EDT

**Subject:** Confirmed Amended Notice physically received but not filed Re: 22-45 Amended Notice of Appeal mailed out August 7, 2023/amended envelop/picked up by mail man from mailbox

Hello,

I talked with Steve Tamos today. He said he saw the order the other day. He looked and saw it was not uploaded. He said to give him a call back later today. Steve said Gail Olson is out. That is why I cannot reach her.

When Gail was out before another clerk handled her matters. Did you give the order to Gail? I should tell Steve if you did. When did you send it to her.

Thank you,  
Meg  
Meghan Kelly  
34012 Shawnee Dr  
Dagsboro, DE 19939

On Thursday, August 10, 2023 at 02:35:01 PM EDT, James Deitz  
<james\_deitz@paed.uscourts.gov> wrote:

Not to mention it looks like its an atty discipline matter which we Have Nothing what so ever to do with so I would send this all to Gail and have her deal with it

Jim Deitz, Pro Se Writ Clerk  
United States District Court Room 2609  
601 Market Street  
Philadelphia Pa 19106"

16. The purpose of my amended appeal was to preserve the issue on the record should the US Supreme Court remand or the Court reopen the case within the time frame of the rules to prevent vitiation of my rights by needless expenses in terms of postage paper and funds I do not have as to deny me access to the courts vitiating the Constitutional rights, claims and my licenses I seek to defend given my poverty, religious objection against debt and invocation of the 13<sup>th</sup> Amendment.

17. The Court order shows there would be opposing counsel most likely the solicitor general or the PA ODC as the rules permit appointment by the Eastern District Court should I

fall into the trap which would not reserve y appeal on the record as I seek to do and would vitiate my Constitutional rights I seek to protect by entrapping me to file an orchestrated appeal created to make it frivolous as it is in another case number not 22-3372 to be preserved in that appeal. Please see the attached documents relating to the booby trap the Third Circuit laid to hurt not help me.

18. I am so upset. I fear I will run out of stamps, time and paper to appeal, and cannot fall into the bad faith trap of Judge Diamond and the Third Circuit tempting me to file what would be a frivolous appeal in a different matter as opposed to preserving the record on appeal to appeal an appealable order on remand or should the case be reopened on the singular matter Case number 22-3372. In bad faith the Third Circuit appears to appoint solicitor general too as opposing counsel.

19. I am scared. The Court is setting me up to fall. It was super scary for me when the DE Supreme court sacrificed their own by firing two of the Chancery Court staff through DE Supreme Court staff Attorney Robinson, Judge Robbie Robinson's wife. Judge Robbie is a Superior Court Judge, and a friend I esteem in real life.

20. It was scary to discover the hidden fact the Delaware Supreme Court sealed two of my petitions I had to fight to unseal, per the email attached hereto and forwarded to Judge Diamond of the Eastern District Court of PA in Exhibit D confirming file and serve indeed sealed it during Kelly v Trump to conceal testimony in my favor in that case, the future disciplinary case, and related matters. See Exhibit E and F the two sealed motions excluding exhibits.

21. Imagine if I did not discover this months later because of my diligence. They gave me no notice or opportunity to be heard. The members of the Delaware Supreme Court sought to

conceal evidence that its own members participated and incited the attacks against me during a live case to cause me to forgo my case based on religious-political-poverty animus in violation of the witness intimidation statute 1985, my right to petition, First Amendment right to religious belief and exercise of belief, association, and other rights.

22. De-Lapp based its attacks on my two petitions before the DE Supreme Court only the Court and Mark Vavala Defendant's Uncle knew about, including the one attached hereto as Exhibit G.

23. I indicated my genuine belief the DE Supreme Court's members appeared to incite the attacks in Kelly v Trump in the document attached to the Motion for leave to file in forma pauperis and initial documents I filed with the Third Circuit in this appeal by averring:

“In my Informa pauperis on appeal at the Third Circuit Docket Item (hereinafter “3DI”) I attach hereto as Exhibit A I pled the issues on appeal are:

I. Whether the District Court erred as a matter of law, overlooking or misunderstanding of the facts, and on Constitutional grounds in the Court's November 2, 2021 order, and Memorandum of Law, dated November 2, 2021 in:

1. Denying Plaintiff's motion to expedite,
2. Dismissing as moot Plaintiff's motions for temporary restraining order and exemption from bond, preliminary injunction and exemption from bond, motion to e-file with waiver of costs, and motion to appear remotely, under the discretion of the court due to poverty and to protect the parties and the court during a global pandemic,
3. Denying Plaintiff's letter-motion for emergency relief with permission to serve such letter/motion to Defendants along with the Complaint and other motions through the US Marshall.
4. Dismissing the case by abstaining under the Younger abstention doctrine, and
5. ordering the clerk to close the case,

Given the evidence shows the Delaware Supreme Court and Chancery Court or their members or agents incited or participated in the conspiracy to interfere, harass, or pressure me to forgo my case against former President Donald J. Trump, and substitution of President Biden for Donald J. Trump to protect my free exercise of religion, speech, and association from government sponsored persecution for such exercise, and to dissolve the establishment of government religion by seeking to enjoin former President Trump and current President Biden from enforcing executive orders creating a union of government-religious entity partnerships, including 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 based on a bought or bartered for partnership between government and religion, not based on safeguarding freedom from forced government religion or forced relationships with religious entities to gain the bartered for government support through such religious entities.

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

The Chancery Court and Delaware Supreme Court's agents' or members' interference in Kelly v Trump, and participation in retaliation against me in instigating a petition to disbar me as an active attorney for the exercise of Constitutionally protected rights were motivated by their members' or agents' desire to suppress or demean or disapprove of my petitions, religious beliefs, speech, political association, and, or poverty in violation of the First Amendment applicable to the Defendants pursuant to the Fourteenth Amendment and in violation of 42 U.S.C. § 1985 (2)(b) or 42 U.S.C. § 1983.

The August 23, 2021 letter the District Court refers to in his memorandum refers to both Chancery Court and Delaware Supreme Court pleadings or petitions as the reason for the Defendants petition against me to disbar me as an active lawyer based on my faith in Jesus Christ, per paragraph 7, in the petition. Though it is remarkable that the District Court offers assurance of the Delaware Supreme Court's jurisdiction while omitting the reference to the petitions to the Delaware Supreme Court as the source the Office of Disciplinary noted for the reason to bring a petition against me.

I petitioned the Delaware Supreme Court to suspend lawyer fees for lawyers out of work during the pandemic. The Court denied my request, indicating they would make determinations on a case-by-case basis.

I made a second request, noting I could not ask the honorable court to violate the Constitution by selective application towards me, as an attorney within a similarly situated class of lawyers facing economic hardship in violation of the Equal Protections Clause applicable to the Court pursuant to the Fourteenth Amendment.

No response was given by the Delaware Supreme Court. I paid the fees. Two months later, De-Lapp an arm of the Delaware Supreme Court and co-conspirator with the Defendants threatened me, requiring a response to their desire to investigate me within 10 days, based on my request for a waiver of fees to the court. How did they know to retaliate against me for the petition, unless the Delaware Supreme Court or their agent told them? De-Lapp's agents obviously were not concerned about helping me pay for the attorney active license registration fees since I made such payment two months before they threatened me.

The Delaware Supreme Court may have had pure motives, concern for poverty by reporting my poverty to the arm. Those motives appeared to turn sour since the Delaware Supreme Court never responded to my second letter relating to relief from lawyer registration fees.

Recently, the Delaware Supreme Court agent ignored my requests to attend a Delaware CLE, which was unusual for her, and appeared to be in conspiracy to retaliate against me and black ball me from participating in activities open to Delaware barred lawyers, based on the petition Defendants brought against me concerning my belief in Jesus Christ. In addition, one of the Delaware Supreme Court justices came into the law library and asked for federal court jury instructions, I believe to prepare to sue me or help a court agent to sue me.

The evidence shows a member of the Chancery Court appeared to seek to sabotage my case, by preventing me to almost miss my filing deadline, and by instructing me to cross off local counsel's address on my praecipe to prevent service, to prevent my case going forward based on her disagreement with my political, religious beliefs or to cover up mistakes or misbehavior. The same staff member appeared to write on my October 5, 2021 praecipes, and underline the praecipes I drafted on October 12, 2021 to testify and be a witness without cross examination for the appellate justices to gain clarification, instead of filing them as I presented them, unmarked. I do not want her to get into trouble.

In April, 2020, Judge Kenneth S. Clark of the Court of Common Pleas interrogated me at BJ's, a bulk grocery store, located in Millsboro, DE in a threatening matter, apparently backed by the Office of Disciplinary Counsel ("ODC"), disapproving of my religious beliefs and law suit.

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

Whether the Delaware District Court is the only court which may afford me a fair trial since the Chancery Court lacked jurisdiction to enjoin the Defendants' unlawful proceeding, as applied, since the facts arose in the Chancery and Delaware Supreme Courts, creating the appearance of lack of impartiality or actual partiality.

II. Whether the pleadings if accepted as true evidence the Delaware Supreme Court, the Preliminary Executive Committee, and Board of Professional Responsibility for the state of Delaware, lack subject matter jurisdiction due to illegality of the petition brought in retaliation against me for the exercise of my protected rights motivated by Defendants' desire to punish me based on my First Amendment exercise of the right to petition, associate, speak, exercise religion and, or poverty, requiring the issue to be remanded to the District Court.

III. Whether the pleadings if accepted as true evidence the Delaware Supreme Court, the Preliminary Executive Committee, and the Board of Professional Responsibility for the state of Delaware lack subject matter jurisdiction, based on violating my procedural and substantive due process grounds, as applied, since the Delaware Supreme Court appeared to participate in the Defendants' interference in my exercise of protected rights, and petition against me for the exercise of those rights, requiring the issue to be remanded to the District Court for consideration.

IV. Whether the Delaware Supreme Court, the Preliminary Executive Committee, and the Board of Professional Responsibility for the state of Delaware lack subject matter jurisdiction due to the fact the appellate court, the Delaware Supreme Court appeared to

instigate, participate in the interference in my law suit Kelly v Trump, and the retaliatory procedure Defendants brought, denying me of a fair trial as I cannot ask the Delaware Supreme Court members to be witnesses, to ask them about their apparent participation, in a case they preside over. Pursuant to Federal Rules of Evidence Rule 605, 28 U.S.C.A. 605, “The presiding judge[s] may not testify as a witness at the trial.”

Whether the evidence if accepted as pleaded evidence the members of the Delaware Supreme Court are material witnesses to the facts relating to the Defendants’ petition, and should dismiss or at least enjoin the petition based on lack of subject matter, to be remanded to the District Court.

V. Whether the petition must be dismissed by the Defendants under 28 USCS § 455 (b)(1) (5)(iv) and 28 USCS § 455, (a),(b)(1), since the Delaware Supreme Court members’ impartiality might be reasonably be questioned as the facts evidence the Delaware Supreme Court’s members or agents appeared to have instigated or participated in the ODC’s and their agents’ or co-arms interference with my case Kelly v Trump, and retaliation against me by bringing the petition I seek to enjoin, but for the exercise of protected freedoms, motivated to suppress my religious beliefs, speech and petitions.

VI. Whether the facts pled which were not discussed by the district court, if proved, would show the proceeding brought by Defendants, is unlawful as applied, and the issue should be remanded to the district court for consideration.

VII. Whether my claims for infliction of emotional distress and potential damages which were not discussed by the district Court, should be remanded to the district court for consideration.

VIII. Whether in the interest of justice, I should be permitted to include a claim for nominal damages against the Defendants, in light of the expedited nature and irreparable injury I face.”

21. I have continuously referred to my belief the DE Supreme court members incited the attacks against me in Kelly v Trump throughout all my Motions for reargument filed since this Court rendered its first order or the attached Motions I incorporate herein by reference.

22. In the Motion for a rehearing of this Courts initial dismissal dated November 6, 2021, filed November 8, 2023, attached from Word to PDF format and found at Exhibit H I averred:

“The evidence shows the Delaware Supreme Court justices partook in the federal law violations. The Defendants and DE-Lapp and coconspirators allege they brought the complaint due to petitions I filed with the Delaware Supreme Court. (D.I. 3, and D.I. 10, D.I. 8, De-Lapp Letter and A-4, A-5). Only the Delaware Supreme court judges knew of my petition to suspend lawyer fees for all unemployed lawyers due to the pandemic, albeit Mark Vavala knew too. Only DE Justices knew of my pleadings as no party responded. The source of the wrongful complaint against me brought to interfere and punish me for my exercise of fundamental rights and belief in Jesus appears to be rooted



in the DE Supreme Court's instigation who will be complainant, judge and jury against me in a proceeding brought in retaliation and interference of my exercise of civil rights, motivated by their desire to suppress my religious associated beliefs. It is injustice guaranteed as the [Delaware] Supreme Court appears to have partaken in federal law violations against me. It would be improper for me to name the Court as a party since I had a case before them, but it appears the Court seeks to sue me, and I no longer have a case before them. They may interplead if they so desire instead of wasting resources, although I prefer not to sue the court, only to protect my fundamental rights, especially to exercise my faith in Jesus. (Exhibit 3). The Court erred as a matter of law by indicating I could receive relief in state court, where no relief is afforded as the Chancery Court and Supreme Court participated in the facts that are the subject of this dispute, forcing Procedural and Due process violations and eliminating my access to the only court who may afford me relief, the District Court. Defendant is the initial judge, while I can argue illegality as a defense, Defendant and the coconspirator Court would wrongly grant immunity to any action I would have brought in state court, giving themselves power to be above the law and Constitution as the courts participated in the conduct which is the cause of this action. "Congress, the Executive, and the Judiciary all have a duty to support and defend the Constitution." *Salazar v. Buono*, 559 U.S. 700, 717 (2010). The conduct by the Chancery and Delaware Supreme Court are the subject matter of this dispute, sabotaging my case by attempting to mislead me to miss my deadline, directing me to cross off DE lawyer's address to prevent service, petitions, and other activity. I petitioned the Chancery Court concerning disparate treatment against me, a party of one, and suppression of my First Amendment liberties by members of the Chancery Court, in addition to members of the Government by filing complaints in the Chancery Court against the Department of Elections and against Presidents Trump and Biden for their requirement I sacrifice my exercise in religious beliefs or other First amendment rights in exchange for the exercise of other rights. (D.I. 4, Exhibits A-4, A-5, 2, 5, and Appendix G), (D.I. 3 at Exhibits 12, 11, 17.) The Supreme Court justice, Judge Clark, and Chancery Court staff are expected to be witnesses to this case. See Exhibit 4. I petitioned the Delaware Supreme Court concerning government agents, acting under the color of law pressuring me to forgo Constitutional rights, with intent or to interfere, punish retaliate, substantially burden and obstruct my exercise of protected rights, motivated by their desire to suppress the exercise of my protected religious exercise, speech, petitions and association, in violation of federal law. 42 USC 1985(2), 1983, USC Section 1. (D.I.3, Exhibits 11, 12, 13.). The authority vested in Defendants under color of state law to conduct investigations and disciplinary proceedings for attorney misconduct do not permit the Defendants to knowingly violate the Constitution and federal laws including Conspiracy to harass, interfere or pressure a party, me, to forgo my case, motivated by their disdain to my poverty, association, religious exercise and beliefs manifesting in my speech and petition, and retaliate against a party for exercise of her civil rights, no matter how repugnant my religious beliefs may be, free will is more important than order and control, bending people's will making society less rich with truth and the free flow of diverse ideas, debate allows, by wrongfully bringing proceedings in violation of federal law as applied to me

State courts are unable to afford me relief to enjoin the wrongful proceedings against me since members of the Chancery Court and the Delaware Supreme Court likely



participated in misconduct by making complaints to Defendants or to agents who made complaints to Defendants. Members of the Delaware Supreme Court were aware of the information DE-Lapp and Defendants refer are the reasons for their wrongful disciplinary proceeding against me. (D.I.). The Court cannot clean Defendants' hands because its owns hands are dirty by involvement in conspiracy to interfere, harass, or pressure me to forgo my case, and in conduct retaliating against me motivated by their disdain for my religious beliefs manifested in speech in the petitions. I would be prejudiced in state court, and have a right to bring my federal claims in this federal court. I must be afforded opportunity to plead my case to prevent injustice, by the elimination of access to the only court able to afford me relief. The Chancery Court is the state court with jurisdiction to grant equity and injunctive relief. The Delaware Supreme Court, which has no jurisdiction to enjoin the Defendants pending a determination of my federal claims, only this Court has jurisdiction, without manifest prejudice and clear error of the law under the facts in the pleadings the court failed to consider. I would be prejudiced by elimination of my First amendment rights with no recourse in the proceedings below as members of the Delaware Supreme Court and Chancery Court appeared to participate in retaliation against me and the institution of the unconstitutional proceedings against me. My letter to the Delaware Supreme Court, which may have been reviewed by all members of the Delaware Supreme Court is the reason why DE-Lapp alleged they instituted proceedings to investigating me under the guise of offering help, since all fees were paid, possibly to cover up the letters I petitioned to Master Griffin. Thereafter, Defendants received Delaware Supreme Court filings, and allege this is the reason they seek disciplinary proceedings. How did they get them? Not through the unserved Defendants, but likely through the members of the Court or through their agents. The prosecutor must not be the judge in my claims for relief for Defendants' retaliation against me for the exercise of my protected rights, and for interference with my case, *Kelly v Trump*. I do not ask this court to conduct a disciplinary proceeding, merely to determine whether the Defendants conduct alleged in my complaint, and the proceeding itself are violations of the laws I alleged in my complaint, to prevent the persecution against me by government agents, and the precedent endangering others of loss of protected freedoms by government agents."

23. In Plaintiff's Motion to Amend Plaintiff's Motion for reargument dated November 8, 2021, attached hereto as Exhibit I which was filed in this case on November 9, 2021, I averred emotional distress claims in my complaint and new ones based on the Delaware Supreme Court's vitiating my 1<sup>st</sup> Amendment right and exercise of religious belief against healthcare and mental healthcare examinations.

24. I also indicated a police officer made a wellness check based on the postal working noticing I was so upset and did not feel safe by the government compelled religious

violation. We talked about the people who talked about shooting me in Dagsboro. I averred therein and noticed this court:

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

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

25. The attached Motion to amend Plaintiff’s Motion for reargument showed this Court additional claims against the Delaware Supreme Court and its members as early as November 9, 2021, and violence against me and my property based on government incited persecution by the establishment of government religion.

26. I restated my beliefs of the Delaware Supreme Court’s incitement of the violations against my First Amendment right to petition and other Constitutional, common law and statutory claims and arguments that the Delaware Supreme Court members could not serve as witnesses, prosecutors or collaborators in misconduct and judges for my claims in its own court in the Amended Motion for reargument at dismissal found at this District Court’s Docket Item (“DI”) DI 21-2 pages 13-24 of 38 pages, dated November 8, 2021, received November 9, 2021. (Exhibit J)

27. On December 6, 2021 I alleged bad faith by Defendant Patricia Swartz where I averred she lied in hopes to cause me to expend funds and resources to run out of stamps and money to continue fighting by alleging she had not received something and lying about receipt after I mailed a second package and spent paper, ink, postage gas and hours printing out a voluminous heavy box.

28. At (Case 1:21-cv-01490-CFC Document 29-1 Filed 12/06/21 Page 2 of 42 PageID #: 3854) to (Case 1:21-cv-01490-CFC Document 29-1 Filed 12/06/21 Page 3 of 42 PageID #: 3855) I cited and resent to opposing counsel, David Weiss in an email indicating:

'Fw: 115327-B/ODC waited until 11/30/21 to confirm/ No. 21-1490  
From: Meg Kelly (meghankellyesq@yahoo.com)  
To: ryan.costa@delaware.gov; zi-xiang.shen@delaware.gov; david.weiss@usdoj.gov  
Cc: meghankellyesq@yahoo.com  
Date: Tuesday, November 30, 2021 at 10:05 PM EST  
Good evening,

Please see below. Your client did not receive it in the mail today, because I mailed the second package today without the CD, per the attached receipt. I did not have time to put everything on the CD on Nov, 19th with your client's threat against me relating to assigning counsel, despite my religious and economic objections.

Please notice, she is not calling me Meg, dehumanizing me with the Ms. despite my religious objection.

I want to make it clear should anything happen to me, I do not want to die. It was scary when an out of state stranger, a big strong man, took off his mask and got in my face accusing me of supporting President Biden, potentially exposing me to covid. Obviously, he does not know me because I am critical of President Biden too. I think I must be on the radar for drafting articles of impeachment and contacting all 541 federal law makers, and it was scary when someone commented about shooting me.

Grace and mercy should be afforded for mistakes, but I do not like lies, misleading assertions, covering up mistakes, not checking the mail from last week. This is bad behavior to say she got something today I did not mail a second time until today.

Your clients place me in danger, and I don't think that is okay. The fact you are charged as AG's to protect people who may be taken out for religious/political beliefs doesn't make me feel very safe, since you are opposing counsel.

I am scared, and have cried. That does not make me disabled. That makes me a human, with a heart choosing to live for God by loving God and others as myself, not more than myself, essentially making people idols. I gave my life to God, not for man to exploit. There is a difference between love and lusts, giving into the temptation to please the mere desires of people or ourselves is not love. Laying down our desires to care to critically think, to know, to love, even at the sacrifice of desires is unconditional love. I believe we each must use our conscience minds to love. It is a choice, not a feeling, one not made for us, but one we each may use our own brains to choose.

I still choose to trust you in hopes we may be able to prevent the planned economic crash, protect the boomers and the world, potentially improve healthcare, safeguard the Constitutional limits on government which makes us free from tyranny by protecting the basis of all freedom, freedom of conscience, to critically think using our own conscience minds, not the force fed thoughts of the few, stifling learning truth and innovation, guaranteeing waste, harm abuse and corruption.

I am copying David Weiss because he may be the hope of saving the US and the world should we fail.

Please note, I desired to prevent an insurrection per the attached letter dated Nov 6, 2020. I think David Weiss would have prevented it if I was allowed to serve him. Please note, down here, David Weiss would be considered very cool, especially in the Coastal Point. The Editor supports cops big time, and Brian Pettyjohn too. Maybe David Weiss can use his coolness to drive out cruelty. We had kkk like attacks at IR high school. White kids gave black kids bracelets with the nazi symbol saying kill yourself, and someone painted a school bus at Cape Henlopen school with racial comments. Biden did not step in. The jokes against jews that are not funny have been picking up at the schools. None of this is ok. People down here still talk of civil war, and God 2021, which is odd. It seems like everyone is buying guns. My HVAC person said he had 40 guns, which is not normal. We need help. We need a hero to prevent harm, to prevent people lawlessly putting the law into their own hands. We need you to instill faith that the law cares for the people, not by instilling threat of punishment or violence but love towards them, and guidance using correction when they are misguided to wrongfully behave, encouraging hope that transforms wrong doers into right doers. Fear encourages evil to hide and fester and spread, instead of helping folks heal from sins. As a Christian, I see you as having the power to save lives and eternal lives with the loving rule of law, even possibly our judges eternal life. See Amos 5:15, Matthew 23:23.

I hope David Weiss, you Ms. Shen or Ryan choose to be the heroes we need.

Have a good night.

Meg

To: Meg Kelly <meghankellyesq@yahoo.com>

Cc: James, Angela D (Courts) <angela.james@delaware.gov>

Sent: Tuesday, November 30, 2021, 04:05:18 PM EST

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

Ms. Kelly

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

Therefore, I am confirming receipt.

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

From: Meg Kelly <meghankellyesq@yahoo.com>  
Sent: Tuesday, November 30, 2021 4:00 PM  
To: Schwartz, Patricia (Courts) <Patricia.Schwartz@delaware.gov>  
Cc: James, Angela D (Courts) <Angela.James@delaware.gov>; Buskirk, Renee (Courts) <Renee.Buskirk@delaware.gov>; Shen, Zi-Xiang (DOJ) <Zi-Xiang.Shen@delaware.gov>; Costa, Ryan (DOJ) <Ryan.Costa@delaware.gov>  
Subject: 115327-B/ODC waited until 11/30/21 to confirm/ No. 21-1490

Ms. Swartz,

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

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

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

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

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

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

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

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

Regards,

Meg

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

Ms. Kelly

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

Patty Schwartz

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

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

Good evening,

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

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

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

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

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

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

Have a good week. Stay safe.

A disappointed,  
Meg..."

29. If I had not filed confirmation of receipt and the expensive Expedited postage November 19, 2021 with signature shown as an attachment and again filed it next day November 30, 2021 per the exhibits to DI 29, Defendants may have lied and kicked the case out under the deceit I did not timely file a response when I timely filed it, and filed it again needlessly because of Defendant's bad faith.

30. I remember learning in law school that the police and state may lie to you in order to entice their will be done like Satan, which is injustice. It was naughty for Patty Schwartz to lie.

31. On December 22, 2021 this District Court filed an Order against my motion and amended motion for reargument on , I moved thrice against due to the immediate constant new threats by Defendants and the State Court.

32. On January 10, 2021 I mailed a Motion for reargument on the courts Order against me filed on January 11, 2021, docketed at DI 34, with exhibits at DI 35 I attach hereto as Exhibit



K with its table of contacts but no exhibits at Exhibit L, where I included the Defendants and Supreme Courts violations of Constitutional rights and other claims by attaching documents from the Delaware Disability/disciplinary proceeding thereto and incorporating therein.

33. In the January 10<sup>th</sup> Motion for a rehearing based on error of fact, of law creating manifest injustice I averred as follows including foot notes:

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

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<sup>1</sup> (emphasis intended); (D.I. 3, Ex 13 Jan 7 petition relating to attorney fees); (D.I. 4, US Ex App B, Ex A-4, A-5, Ex A of Ex. F, referring to the complaint and two motions relating to second petition relating to attorney fees, App E and F, Briefs).

<sup>2</sup> See, *Davis v. Jones*, 506 F.3d 1325, 1330 (11th Cir. 2007) indicates this statute only applies to the **federal courts, not state courts**. The statutes analysis is useful in a procedural due process analysis regarding impartiality and a fair trial, as applied to me. The Third Circuit in *Johnson v. Carroll*, 369 F.3d 253, 259 (3d Cir. 2004) indicates, “28 U.S.C. § 455 [is for federal judges] and not on direct precedent related to the [state] trial judge's appearance of bias.” This is distinguished from my case since it dealt with Section 455(a), not section 455(b)(1) and (5)(iv) as I plead. Appearance is not enough for the Third Circuit which is praise worthy because the individual justices are concerned with actual justice, under the facts, not the marketing or popularity of justice as a business).

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

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



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

The Court also overlooked the facts indicating the Delaware Supreme Court incited or participated in the conduct in interference of and in retaliation of my exercise of Constitutionally protected conduct which is the subject of this dispute, and cannot be the judge of its own relevant conduct or participation relating to this matter, where I am not only seeking equitable relief, but I sought damages for emotional distress.<sup>3</sup> I believe I developed the shingles as a result of this case on or around January 3, 2021 too.<sup>4</sup>

The entire Supreme Court may have reviewed my request to suspend active attorney license registration fees for lawyers facing economic hardship during the pandemic, and my second request for relief relating to attorney license registration fees. De-Lapp, an arm of the court, claimed their interference with my active case, was because I petitioned the Court for relief from attorney dues.<sup>5</sup> De-Lapp, an agent of Defendants, was not going to help me. (Ex. C). I already paid the fees. They sought to gather evidence against me, to punish me for my exercise of fundamental rights, including the right to petition the court regarding attorney dues. It appears the Delaware Supreme Court justices or agents incited the arms to attack me by providing the information to DE-Lapp. I made a request for Chief Justice Collins J. Seitz, Jr. to recuse himself. *Id.* So, he did not participate in *Kelly v Trump*. Three Delaware Supreme Court Justices participated in the matter which is a source of Defendants' unlawfully motivated petition against me, Justices, Vaughn, Traynor and Montgomery-Reeves. (D.I. App A, App B); (Ex. D).

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

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

<sup>4</sup> D.I. 2 page 103. I would also like to include nominal damages, to protect fundamental rights including the right to worship or not according to the dictates of our own conscience, not the dictates of the government. Since this right is more important than money, and is not something money can remedy. Freedom is not for sale by barter or exchange.

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

Pursuant to Federal Rules of Evidence Rule 605, “The presiding judge may not testify as a witness at the trial.” I am not afforded the opportunity to ask the Delaware Supreme Court in the Board’s venue or in the Delaware Supreme Court’s venue to ascertain the Court’s incitement and participation in the action by the Defendants. Neither is the ODC. I am not afforded a fair and impartial trial to determine the legality of the proceeding, for nominal damages, damages for emotional distress, injunctive or other additional equitable relief. The state forum does not afford a venue for the relief I seek. (Ex. E, Notice to the Supreme Courts of my objections of state court jurisdiction). Only the federal courts may afford me a fair, not fixed, opportunity to be heard. There is no guarantee of justice. Yet, injustice is guaranteed if the doors to the only fair, impartial forum, that may afford me, a party, with relief is closed due to pro se, in forma pauperis status, partiality to the state which is not permitted, or based on malicious motives such as religious political beliefs.

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

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

The law library also was granted PACER access by the Delaware Supreme Court which is suspicious, evidence the Delaware Supreme Court is preparing a case against me. Justice Traynor also came into the law library looking for federal jury instructions, I believe to prepare someone to sue me in federal court, which if it is true, makes a fair trial impossible in the Delaware Supreme Court. The state Court and the Board are without jurisdiction to hear my grievances for this unlawfully brought petition.

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

Since October 25, 2021, new and additional facts have arisen which must be considered by the Court to correct clear error of facts, to correct clear error of law and to

prevent manifest injustice preventing me a full and fair opportunity make my case and litigate the issues.

On or about November 3, 2020, the Preliminary Review Committee met and determined a petition may be brought by Defendants against my person relating to my case *Kelly v Trump*.<sup>6</sup> Defendant indicated her desire to appoint counsel. I objected on religious and economic grounds. Despite my objection she requested appointed counsel with the Delaware Supreme Court. I filed a letter indicating I would object to appointed counsel, and another letter providing notice that I will object to the Supreme Court's subject matter jurisdiction. (Ex. E, F). On Fri., Dec. 10, 2021, the Board signed a notice of a hearing. I was not provided proper notice on Dec. 10, 2021. On Mon., Dec. 13, 2021, the Delaware Supreme Court appointed counsel despite having notice of my objection to counsel which caused me great emotional distress. On Thur., Dec. 16, 2021, I received a letter regarding the appointment. On Fri., Dec. 17, 2021, counsel contacted me. I immediately indicated my objection to his appointment. On Sat., Dec. 18, 2021, I filed the attached letter with the Board objecting to improper service, requiring a postponement on the hearing so I may be afforded discovery, and a decision on counsel, and notice that I intended to file a motion with the Delaware Supreme Court on Monday. (Ex. G). On Mon., Dec. 20, 2021, I filed *Respondent's Motion for reconsideration of order dated December 13, 2021, appointing counsel despite my notice of intent to object, and objection of improper service of the Board's Notice of Hearing, dated December 10, 2021*, with the Delaware Supreme Court, with a copy to Defendant, and the Board, albeit the Board's copy was mailed Dec. 21, 2021. (Ex. H). On Dec. 21, 2021, I filed the attached letter with the Court rejecting appointment of counsel. (Ex. I). Appointed Counsel moved to terminate his appointment on Dec. 23, 2021. On Dec. 29, 2021, I filed a letter motion with the Court to inter alias object to counsel on 6<sup>th</sup> Amend. Grounds and postpone the hearing in the interest of justice. (Ex. J). The Court excused counsel.

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

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

I have not received a response. The scheduled hearing is in less than 4 days. I did not receive proper notice, and have not received a response regarding discovery or postponement of the hearing. This is not a fair proceeding. This is punishment, to bend my will to conform to the state's worship of business greed at the cost of selling my soul to hell, a cost too great. My faith in Jesus teaches me not to be conformed to the world. The Constitution allows me to hold religious beliefs different from the state. The Constitution protects me from government retaliation for my beliefs, speech, association and petitions relating to my religious beliefs.

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<sup>6</sup> The Preliminary Investigative Committee can be removed from my complaint, as the injunctive relief sought is now moot. Additionally, should defendants David White and Kathleen Vavala abstain from involvement I will stipulate to their removal from the complaint, but I do not waive my one free Amendment of complaint before service to Defendants on this.

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

34. On January 18, 2022 I drafted and signed *PLAINTIFF'S SECOND ADDITIONAL MOTION PURSUANT TO FRCP R. 52(b), 59(e) and 60(b)(1)(2)(6) TO AMEND FINDINGS OF FACTS AND ALTER THE ORDER, DATED DECEMBER 22, 2021, BASED ON NEW FINDINGS OF FACT, TO PREVENT, CLEAR ERROR OF FACTS, CLEAR ERROR OF LAW, AND TO PREVENT MANIFEST INJUSTICE*, filed January 19, 2022 and attached hereto with table of contents excluding exhibits at Exhibits M, N (hereinafter "2<sup>nd</sup> Motion")

35. I attached documents, the records and other relevant items from the Delaware Disciplinary proceeding and incorporated it therein.

36. In the 2<sup>nd</sup> Motion I averred:

1. I also am providing notice that I will likely, to my chagrin, amend my complaint to include the Delaware Supreme Court as a Defendant and individual judges for nominal and equitable relief.<sup>7</sup> The Supreme Court incited, participated or caused the unlawful retaliatory state Court proceeding and the Delaware Supreme Court arms' interference in my lawsuit *Kelly v Trump* on violation of 42 USC Section 1985(2). Whether the Delaware Supreme Court's report to DE-Lapp was out of concern for poverty or a malicious purpose is in issue. A complaint was made apparently by the Supreme Court or its agent based on my petition for relief from attorney dues to the arm's

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<sup>7</sup> I respectfully request to include nominal damages should the Court allow amendments to the complaint. See, *Freedom from Religion Found. Inc. v. New Kensington Arnold Sch. Dist.*, 832 F.3d 469, 490, 2016 U.S. App. LEXIS 14594, \*49-50. Also see, *Molina v. Pa. Soc. Serv. Union*, 2019 U.S. Dist. LEXIS 120040, \*27, 2019 WL 3240170.

of the Court. (Ex.1<sup>st</sup> A). De-Lapp, an arm of the state court, would never have attacked me, but for this petition relating to lawyer license dues, per their own admission. (D.I. 3, District Court Exhibit 13, D.I. 9, Exhibits 1, 2, 3). The Delaware Supreme Court did not grant my petition, and ignored my second petition, deeming me unworthy of the opportunity to be heard on relief from attorney dues, in potential violation of the substantive and procedural due process clause, and in violation of the Equal Protections Clause of the 14th Amend. as applied to me, a party of one, for disparate treatment motivated by my poverty, religious beliefs or exercise of fundamental rights. This Court overlooked the Delaware Supreme Court's apparent incitement of the unlawful proceeding against me in state Court by its arms, brought to punish me, but for, my exercise of Constitutional rights. I desire to protect the Courts, to protect those I seek to correct in this case. I am sad your honor did not enjoin the state proceeding to date, forcing me to add the Delaware Supreme Court and its members. My hope of a hero to preserve our union and to make it more just and freer is with the Courts.

2. I am getting sued by the government for my faith in Jesus Christ. Defendants appear to think my worship of God instead of money and material gain is a mental disability. Jesus says you cannot serve God and money. (D.I. 20, 21). ((Ex. A), Email to Defendants regarding my religious beliefs since my religious beliefs are in question), also see (Ex. C, Ex D, Ex. Ex. E, internal Ex. F, H, I).

3. I am making this Motion in addition to, not in amendment of or in replacement to the previous motion (also referred to "M1"), I made seeking similar relief, albeit with additional facts which must be included to prevent clear error of fact, of the law and to prevent manifest injustice. Since, I filed that motion served to the Court and Defendant via US Mail on 1/10/21, new and additional facts arose which must be considered by this court to prevent manifest injustice.

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

5. **On 12/29/21**, I also served a letter with exhibits with both the Delaware Supreme Court and Defendant Board notifying them,

"The hearing is **two weeks away**, no determination has been made by the Court on my exercise of self-representation under the 6<sup>th</sup> amendment, and on religious grounds, and on my request to postpone the hearing so I may perform discovery to adequately defend my exercise of Constitutionally protected activity which is



the subject of this petition, per the state's admission. (Emphasis Intended), (Citing M1 at Ex J page 1, and at internal-Ex A part 2 and Petition at 7).

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

7. I have not been afforded a fair opportunity to prepare a defense, research, gather evidence, and facts and file motions I noticed the Board and Court I intended to file, after a fair investigation was allowed in conformity with the standards of Constitutional due process, 1. to dismiss the petition based on illegality of proceeding and 2. a separate motion to dismiss based on lack of subject matter jurisdiction due to the Supreme Court's participation in inciting the petition against me, but for the exercise of my Constitutionally protected rights.

8. I repeatedly, checked on the status of my motion to postpone the hearing, and opportunity to prepare a defense, and only heard back on 1/10/22. The Board indicated the hearing was on schedule for 1/13/22. (Ex D at internal Ex. B).

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

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

11. On 1/11/22, the Delaware Supreme Court swiftly granted an order denying relief based on jurisdiction. (Ex. E Internal-Ex. B).

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

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

14. On 1/11/22, the Board granted an order postponing the hearing for eight days **due to alleged illness**, a reason not included in my motion. (emphasis intended)

6(Ex. E Internal-Ex. B). The Board was aware I was not feeling well when I immediately notified them, I was not feeling well, a week earlier. (Ex. E, internal Ex J, and Ex F).

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

16. I notified the Board and ODC of my opposition to examination by health or mental health professionals based on religious objections in my Answer to the petition, and through E-mail, despite the ODC seeking to tempt me to include such an argument in a motion. (Ex. E. at Internal Exhibits G, H, I, L, M), (Ex F).

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

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

19. On 1/12/22, I appealed the Board's Order by filing *Respondent Meghan M. Kelly's Motion Appealing the Order of the Board on Professional Responsibility of the Supreme Court of the State of Delaware dated, January 11, 2022, granting postponement of the hearing for 8 days due to illness, not a reason identified in her motion to grant postponement to afford her opportunity to prepare a defense, perform discovery, research, file motions, be heard on outstanding motion(s) unaddressed by the Board, to defend her exercise of fundamental rights and to preserve her license to practice law, on the grounds the amount of time is not enough and a hearing date should be postponed until after a fair opportunity to build a defense*, dated January 12, 2021. (Ex. E incorporated herein in total).

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

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

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

23. So, I made a motion, once again to suspend the hearing date, to call witnesses, and perform discovery for my defense of exercise of fundamental rights without the state's punishment for my exercise. I have the right to believe, think and exercise my faith differently than the majority. Individual liberties, such as my right to an impartial proceeding, an opportunity to be heard, adequate notice, opportunity to perform research and a defense without disparate unfair treatment, motivated by the state's disdain for my religious beliefs, are protected by Constitutional Law from government backed mob reign of controlled, conditional, conformed lusts. I am not sitting on this, but am acting in haste to protect and assert my Constitutional rights to prevent waiver.

24. On 1/15/22, I filed a motion for immediate emergency relief, and a new motion with the Board, attached hereto, and incorporated herein in total, *Respondent's more particularized motion to suspend the hearing, scheduled for January 21, 2022 to allow me opportunity to research and prepare a defense, requesting opportunity to draft requests for admission, interrogatories and subpoena opposing counsel, Patricia Swartz, as a necessary witness in her defense, and subpoena other necessary witnesses, including but not limited to, Chief Justice Collins J. Seitz, Judge Kenneth S. Clark, Jr., due to his admission he interrogated me based on my exercise of fundamental rights incited by the ODC, and Arline Simmons, to show unconstitutional motive for this petition, to allow, the accused, respondent an opportunity to defend herself on the defense illegality of proceeding, as applied to her, motivated by disdain by the state for her religious associated beliefs and exercise of fundamental rights, and lack of jurisdiction based on the Delaware Supreme Court's apparent participation in inciting this petition against respondent.*

25. There are only 3 business days before the rescheduled hearing. I informed Defendants I am not ready, and need time to prepare a defense, to subpoena witnesses, to perform legal research and to draft motions based on additional facts found in discovery. The Defendants fail to grant me a fair opportunity to build my defense, despite my multiple requests in contravention of conformity with the requirements of a fair proceeding under the Due Process Clause. There is no legitimate or important reason for Defendants to rush this matter at the cost of eliminating my right to an opportunity to prepare a defense and at the cost of creating an unfair proceeding in violation of the substantive and procedural Due Process Clause and the Equal Protections Clause of the 14th Amend.

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

27. "Congress, the Executive, and the Judiciary all have a duty to support and defend the Constitution." *Salazar v. Buono*, 559 U.S. 700, 717 (2010). Defendants act above the law, and declare me below the law, by denial of Constitutional protections, motivated by disdain for my religious beliefs and poverty.



28. I will suffer continued irreparable harm if I am unable to gather testimony and facts to provide a defense of dismissal of the petition, based on subject matter and illegality of proceeding, as applied, under the facts of the case, to chill the exercise of my fundamental rights, thereby chilling the rights of others by such unconstitutional precedent. ‘The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.’” *Mullin v. Sussex Cnty., Delaware*, 861 F. Supp. 2d 411, 427 (D. Del. 2012); Citing, *Indian River Sch. Dist.*, 653 F.3d at 283 n. 14 (quoting *Elrod v. Burns*, 427 U.S. 347, 373, 96 S.Ct. 2673, 49 L.Ed.2d 547 (1976)).

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

30. The right for the opportunity at justice is not a guarantee. It is the right to petition the Courts, without state punishment, that must be protected. Otherwise, only the Courts may selectively apply who has rights or not in violation of the Equal Protections Clause.

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

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

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

35. I have not sold soul to hell in exchange with the license to practice law.

WHEREFORE, this court must amend findings of fact, alter the order, dated December 22, 2021, based on new findings of fact, to prevent clear error of facts, clear error of law, and to prevent manifest injustice.

37. I specifically advised opposing counsel and the court I would seek to amend the complaint to add the Delaware Supreme Court and its members as Defendants. I specifically told the court I seek damages in footnote citing to case law, and I averred new facts causing additional irreparable injury, harm and claims in the 2<sup>nd</sup> Motion.

38. I filed *PLAINTIFF MEGHAN M. KELLY'S 3rd EMERGENCY MOTION PURSUANT TO FRCP R. 52(b), 59 (e), 60(b)(1)(2)(6), and 65* (hereinafter "3<sup>rd</sup> Motion") by mail and I actually hand delivered it by driving the 4 hour round trip in hopes to prevent irreparable injury it on my birthday January 19, 2022. So it appears on the record twice at DI 36 filed on January 19, 2022 and DI 41 on January 21, 2022.

39. In 3<sup>rd</sup> Motion I averred:

1. Since yesterday, January 18, 2022, after I served a second emergency motion pursuant to pursuant to FRCP R. 52(b), 59 (e), and 60(b)(1)(2)(6) additional facts must be presented and considered by the court to prevent manifest injustice, and to allow for relief this court Plaintiff already requested pursuant to FRCP R. 65 in her motions for a preliminary injunction and temporary restraining order. (D.I. 6, 7, 8, 9, 10, 11, 33) (Ex. A, Return receipt of January 18, 2022 motion served to the court).

2. The Defendant Board rendered a decision, attached hereto, denying me of the right to subpoena witnesses, cross examine witnesses, and present evidence, by denying her ability to collect the same, in defense of my exercise of fundamental rights without state interference and punishment by bringing the petition against me, but for my religious beliefs and exercise of fundamental rights including the freedom of conscience to think, believe, exercise religious beliefs, speak based on her beliefs, petition the courts, and associate. (Ex B, informal decision along with critical emails)

3. The State has brought a petition against me for my faith in Jesus Christ. Defendants appear to think my worship of God instead of money and material gain is a mental disability. Jesus says you cannot serve God and money. I believe people go to hell for organized charity, pro bono, fundraising, forcing individuals to work as discipline in violation of the 13<sup>th</sup> Amend., and **blindly** doing what they are told at a job for money to care for their family, while not caring to **see clearly to love God** as God, instead of money as savior and God, and not caring to **see clearly** to love others, by understanding how their product or service may harm others God loves.<sup>8</sup>

4. On December 13, 2017, the Delaware Supreme Court appointed counsel despite having notice of my objection.

5. I experienced emotional distress relating to this government compelled violation of my religious belief and filed a number of papers before the Delaware Supreme Court granted me permission to represent myself on December 30, 2021.

6. Prior to that date, I filed a motion for time to prepare a defense, research and perform discovery to determine which witnesses to call.

7. I followed up numerous times with the Board on the status of my motion, but it was not until January 10, 2022, that an indirect determination was made. The Board ignored my motion, escaping an appealable order to deprive me of an opportunity to be heard in violation of the substantive and procedural due process clause, arguably basing

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<sup>8</sup> (Emphasis intended, See, *Jn.* 12:40, *Lk.* 11:34)

their disparate treatment towards me, by partiality towards the state, demeaning my religious beliefs, religious exercise and exercise of the right to petition, and associate and speak, as unworthy of protection in violation of the Equal Protections Clause, and the Due process and substantive due process clause of the 14<sup>th</sup> Amend. (Ex B).

8. On January 11, 2022, I filed an emergency motion, simultaneously with the Board and Delaware Supreme Court, appealing the refusal of the Board to afford me an opportunity to prepare a defense, gather facts, research and perform discovery.

9. The Delaware Supreme Court denied my appeal, since the unofficial decision rendered by the Board maliciously designed to prevent a fair opportunity for me to be heard and appeal, was not deemed a final appealable order by the Delaware Supreme Court.

10. The Board rendered an order later on January 11, 2022.

11. Without delay, I appealed this order with the Delaware Supreme Court on January 12, 2022.

12. The next day, January 13, 2022, I filed a motion for an emergency immediate decision on my January 12, 2022 appeal.

13. The following day, January 14, 2022, the State brought an answer to a motion rendered moot to harass and distract me, knowing I argued I did not have enough time to prepare and present a defense, with no opportunity for discovery or to call witnesses.

14. The day after that, Saturday, January 15, 2022, I served a different motion with the Board to call specific witnesses, requesting subpoenas, and additional time to send Requests for admissions and interrogatories to Defense Counsel, which are necessary for my defenses to this case, the illegality of the proceeding as applied, motivated by the state's desire to punish me for my exercise of protected conduct in contravention to the First Amendment applicable to the State pursuant to the 14<sup>th</sup> Amend., and in violation of the Equal Protections Clause by disparate treatment towards me based on my religious beliefs and poverty, deeming me unworthy to be heard and unworthy of other Constitutional rights.

15. Immediately after the holiday weekend, two business days after my appeal, on Tuesday, January 18, 2022, the Delaware Supreme Court denied my appeal, which was based on protecting my fundamental rights. (Ex C., attached Order, dated January 18, 2022, Ex D, prior Order of the Supreme Court, dated January 11, 2022, Ex F, prior order of the Board, dated January 11, 2022).

16. My defense of subject matter jurisdiction is based on the Delaware Supreme Court's participation in inciting the illegal proceeding, as applied.

17. On my January 15, 2022 motion filed with the Board, I noted the court's apparent participation, and the need to cross examine Chief Justice

18. The Court maliciously indicated, indirectly the right to a fair, impartial, opportunity to be heard, opportunity to defend basic liberties was somehow frivolous, to allow the lawless reign of lusts, their will be done, instead of honoring the Constitutional protections afforded to me, the least of these, in violation of the Equal Protections Clause, and substantive and procedural due process clause. (Ex. C)

19. The Delaware Supreme Court is depriving me of an opportunity to be heard and a fair trial. The Board denies me the right to prepare a defense, to subpoena

witnesses, and cross examine necessary witnesses. This is not a lawful proceeding. This is my hanging but for my belief in Jesus the Christ. I am in great immediate danger.

20. The Court indicated it would not hear any frivolous motions, giving a colluding sign to the Board not to file an official order, to prevent my opportunity to be heard on appeal.

21. On January 18, 2022, the Board rendered a decision, while not placing the decision in an official Order with the intent to deprive me of the opportunity to be heard on appeal. (Ex. B).

22. An unlawful secret proceeding is scheduled against me on Friday, January 21, 2022, with the purpose to punish me for exercising my religious beliefs, speech defending the exercise of such beliefs without government sponsored burdens, and petitions relating to my exercise of fundamental rights, and my associated rights as a Christian, as an American and as an attorney to believe in Jesus Christ without compromise, and without sacrifice of fundamental rights or my license to practice law. (Ex B)

23. The Supreme Court appears to be conspiring with Defendants to punish me in violation of 42 USC Sections 1983, 1988, and in potential violation of 1985(2), with intent to harass and interfere with my assertion of Constitutional rights, by depriving me of a fair opportunity to be heard.

24. The Court and its members must be included on the Complaint as necessary Defendants, including Chief Justice Collins J. Seitz, Jr., Justice Traynor, Justice James T. Vaughn, Jr., and Justice Tamika R. Montgomery-Reeves. The latter three reviewed and rendered orders in *Kelly v Trump*. I seek equitable relief and nominal relief for deprivation of my constitutional rights.

25. I am grateful I informed the Court of my intent to add the Delaware Supreme Court and its members as Defendants, prior to receipt of the January 18, 2022 state Supreme Court order by service of my Motion, *Plaintiff's Second additional motion pursuant to FRCP R. 52(b), 59(e) and 60(b)(1)(2)(6) to amend findings of facts and alter the order, dated December 22, 2021, based on new findings of fact, to prevent clear error of facts, clear error of law, and to prevent manifest injustice*, incorporated herein by reference in its totality.

26. My intent is now cemented by the great injustice towards me, and injustice towards all Americans by disparate selective application of who is worthy of Constitutional rights, by denial of my rights merely because they disagree with my personal beliefs.

27. In America I am free to believe differently, even have beliefs others find repugnant, or unsound. In America I should be free to worship Jesus Christ without sacrificing fundamental rights, and without sacrificing my paid for active license to practice law.

28. On October 26, 2021, I asked a Court representative, Renee Buskirk, to ask the Chief Justice whether he filed a complaint against me to get De-Lapp and the ODC, in hopes to get an affidavit to prevent the need to subpoena the Chief Justice as a witness. (Ex. B)

29. To my horror, I discovered Renee appeared to work for Defendant, ODC, as I later discovered her on an email with the Defendants. (Ex. F)

30. The Defendants knew of my desire to question Chief justice and other witnesses. I asked for opportunity to perform discovery in hopes to gain answers in a gentler form than subpoenaing witnesses. (Ex. B) However, with the recent denial of the Board on January 11, 2022, and denial of the appeal to the Supreme Court, dated January 18, 2022, I had no choice but to act in presumptive haste by filing a motion on January 15, 2022 to subpoena witnesses to cross examine during the state court hearing.

31. The Delaware Supreme Court's assertion relating to ignoring frivolous appeals, while not calling the appeal frivolous is a signal for the Board not to render an order so as to deprive me of the opportunity to be heard on appeal.

32. The Delaware Supreme Court's assertion that having an opportunity to prepare and present a defense based on 1. illegality of proceeding as applied, and 2. lack of subject matter jurisdiction, due to its own incitement or participation in inciting its arms of the court to attack me, but for the exercise of fundamental rights, is unworthy of consideration, is clear evidence of its inability to be impartial in my case.

33. I object to the illegal proceeding as applied. I object to the deprivations of my substantive and procedural due process rights, as applied to me by denying me opportunity to research, collect evidence and prepare a defense. I objected to lack of notice and the form of notice provided as insufficient by the Board for any hearing. I objected to the denial of my right to cross examine and present a defense in violation of the 6th Amend.

34. The State must meet strict scrutiny to overcome any of my objections, which it cannot meet, rendering these violations of my Constitutional rights inexcusable.

35. I am incredibly disappointed in the lawlessness exhibited by the state.

36. I also objected to the closed proceedings, and requested the proceeding be conducted in open court to protect me from secret, concealed collusion from the state to let their will be done, instead of applying limitations on the state with the rule of Constitutional law.

37. On January 18, 2022, I filed a different motion with the Court, the Court is scheduled to receive today with information that I include and incorporate herein by reference in its totality.

38. I do not waive my motions to exemption of PACER fees, but am filing this now, so as not to violate a greater sin against God by failure to assert my rights. Not all sins are weighted the same per Jesus the Christ. (*Matthew 23:23*). Injustice in the courts is damnable per God, by loving costs, convenience and comfort more than God or one another. (*Amos 5:15*); (*Also see, Isaiah 10:1-2* "Woe to those who enact unjust statutes and issue oppressive decrees, to deprive the poor of fair treatment and withhold justice from the oppressed." Whenever God says "Woe to you" I believe it means damned to hell are you should you not repent by unhardening your head and unhardening your hearts to love to overcome lusts that lead to the second death.).

Wherefore I pray the Court grants my motion to appeal and immediately reconsiders my motions for a temporary restraining Order and preliminary restraining order to enjoin the hearing scheduled January 21, 2022.

40. I averred facts where Delaware Supreme Court members and Defendants violated my right to notice, a fair opportunity to be heard, the right to subpoena witnesses, perform discovery, prepare and other Constitutional rights and caused others harm. I indicating my intent was cemented to add the Delaware Supreme court and the members in the 3<sup>rd</sup> Motion.

41. On January 24, 2022, I filed a Motion to amend the Complaint once as a matter of right under FRCP Rule 15.

42. Since then I moved to amend my complaint to include inter alias Constitutional arguments against disciplinary rules, including Rule 13 and 14, to add new and additional facts and claims, and to prevent additional injustice prior to the Court's order on my 3 Motions for reargument. On April 26, 2022, I sent the attached letter, along with three videos to be used as evidence on a memory stick noticing the court of my intent to amend the Complaint to contest the Constitutionality of the Disciplinary rules. Exhibit P. I also had other Constitutional arguments on the record concerning the Constitutionality of the proceeding including but not limited to arguments contained in two motions filed in the DE Disciplinary proceeding attached hereto at Exhibit Q and R, excluding other arguments I reserve the right to assert against the rules like the compelled violation against the 5<sup>th</sup> Amendment right against self-incrimination of disability or discipline under the threat of separate penalty in the Delaware and Federal disciplinary rules, should this be remanded and include an additional argument I referred to in the other case attached hereto as Exhibit S.

43. Later the same day, April 26, 2022, the Court entered an order denying my three outstanding motions while not considering this evidence on the record of my intent to amend my Complaint once as a matter of right under a rolling motion to include Constitutional arguments on rules, and the fact the DE Supreme Court actually copied the Defendants in response to my



request to be excused from the notary requirements. The Court never ruled or considered the motion to amend my complaint on January 24, 2022.

44. Since then, I moved to amend the complaint with additional legal arguments, facts causing manifest injustice, sought a rolling motion to amend thrice or more times to move the court to permit me to amend the complaint to include additional ever arising evidence, facts, harm, claims to prevent manifest injustice.

45. I moved to withdraw my original motion to amend the complaint, dated January 24, 2022 to allow me to amend the complaint once as a matter of right before any complaint is served upon any Defendant. This Court indicated it would not consider the motions since the appeal is stayed. Nevertheless, if the case should go back to this Court on remand, I may refer to the docket items and information contained therein arising in real time with prior notice to the court and opposing counsel of the additional evidence, parties, and facts I intend to include in an amended complaint as a matter of right, per this Court's staff's brilliant suggestion. I thank this Court's staff for encouraging me to file affidavits to keep the court informed of new facts and events arising. You are smart, kind and indispensable to the Court with especial importance to pro se litigants such as myself in preserving and defending their claims and liberties. People staff are not replaceable by automation.

46. I included more facts on the record before this Court and the Third Circuit showing to my horror the DE Supreme Court participating in removing two witnesses from the Chancery Court staff to prevent their testimony while specifically ignoring my motion for time to subpoena one. I would have had a hard time subpoenaing Arline Simmons because she was no longer with the court. I also discovered the entire Supreme Court members appeared to have incited the state attacks against me in *Kelly v Trump*, not merely Chief Judge Seitz. Lisa Dolph

indicated the entire court not merely one member reviewed my motions for relief relating to bar dues.

47. Since Chief Judge Connelly's last order denying motions for reargument many other different claims arose, including but not limited to the DE Supreme Court's denial of my request for access to the records against me In the Matter of Kelly relating to the appointment of counsel. The pleadings were not properly filed on Number 58 to permit me a record to appeal. I was denied access to the record in order to discern whether I was denied an opportunity to be heard fully and fairly. I suspect the Delaware Supreme court did not file my pleadings where I opposed the appointment of counsel to cover up violations my Procedural Due process rights, 1<sup>st</sup> Amendment right to petition and 1<sup>st</sup> and 6<sup>th</sup> Amendment to self-represent on religious grounds to evade review or correction for violating my First Amendment right to be heard and fair treatment and access to the courts in violation of the 14<sup>th</sup> Amendment procedural Due process Requirements to defend fundamental 1<sup>st</sup> and 6<sup>th</sup> Amendment fundamental rights, including but not limited to the right for the accused to cross examine witness, self-represent, and other claims.

47. Where the Supreme Court members are witnesses they may not be a judge too. I argued this forum is the only forum where I may have relief.

Thank you for your time and consideration.

42. Since then I moved to amend my complaint to include inter alias Constitutional arguments against disciplinary rules, including Rule 13 and 14 and new and additional facts, claims, and to prevent additional injustice prior to the Court's order on my 3 Motions for reargument that are not amended but different motions for reargument based on new and additional facts causing manifest injustice on April 26, 2022, along with three videos to be used as evidence on a memory stick. Exhibit P. I also had other Constitutional arguments on the

record concerning the Constitutionality of the proceeding I attach hereto at Exhibit Q and R, on the record in different dates, excluding other arguments against the rules like the compelled violation against self-incrimination of disability or discipline under the threat of separate penalty, and reserve leave to make additional arguments should this be remanded and include an additional argument I referred to in the other case attached hereto as Exhibit S, T, U.

43. Later the same day, April 26, 2022, the Court entered an order denying my three outstanding motions while not considering this evidence on the record of my intent to amend my Complaint once as a matter of right under a rolling motion to include Constitutional arguments on rules, and the fact the DE Supreme Court actually copied the Defendants in response to my request to be excused from the notary requirements. The Court never ruled or considered the motion to amend my complaint on January 24, 2022.

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45. I moved to withdraw my original motion to amend the complaint, dated January 24, 2022 to allow me to amend the complaint once as a matter of right before any complaint is served upon any Defendant.

45. I included more facts on the record before this Court and the Third Circuit showing to my horror the DE Supreme Court participating in removing two witnesses from the Chancery Court staff to prevent their testimony while specifically ignoring my motion for time to subpoena one. I would have had a hard time subpoenaing her because she was no longer worked with the court. I also discovered the entire Supreme Court members appeared to have incited the

state attacks against me in Kelly v Trump, not merely Chief Judge Seitz. Lisa Dolph indicated the entire court not merely one member reviewed my motions for relief relating to bar dues.

46. Since Chief Judge Connelly's last order denying motions for reargument many other different claims have arisen or continue to arise, including but not limited to the DE Supreme Court's denial of my request for access to the records against me In the Matter of Kelly relating to the appointment of counsel. The pleadings were not properly filed on Number 58 to permit me a record to appeal, and I was denied access to discern whether I was denied an opportunity to be heard fully and fairly. I suspect the Delaware Supreme court did not file my pleadings where I opposed the appointment of counsel to cover up violations my Procedural Due process rights, 1<sup>st</sup> Amendment right to petition and 1<sup>st</sup> and 6<sup>th</sup> Amendment to self-represent on religious grounds to evade review or correction for violating my First Amendment right to be heard and fair treatment and access to the courts in violation of the 14<sup>th</sup> Amendment procedural Due process Requirements to defend fundamental 1<sup>st</sup> and 6<sup>th</sup> Amendment fundamental rights, including but not limited to the right for the accused to cross examine witness, self-represent, and other claims.

47. Where the Supreme Court members are witnesses they may not be a judge too. I argued this forum is the only forum where I may have relief.

48. There is so much to argue in both matters. I have limited paper and stamps. I spent many days trying to print out pleadings I may not be able to afford to send the US Supreme Court.

49. In addition, the US Supreme Court may hear my case against PA ODC to prevent law suits in PA where its rules do not have jurisdiction under its own rules. The case is not ripe under its written rules and exceeds the Constitutional limits as not ripe. I hope they do, because I

may be threatened by another law suit if they do not from PA ODC should I not overturn the US District Court Eastern District Order.

50. I think it important to possibly appeal the US Eastern District of PA case first, in hopes a stay would be granted so as not to interfere with this case, and also to ask the court to protect the integrity of the Courts.

51. I think that case may be the more proper vehicle to prevent regulation of the US Supreme Court, albeit I reserve m arguments and will create new ones before this court should it be remanded and I be permitted to do so.

52. I asked opposing counsel her stance on a second request for more time, attached hereto as Exhibit. V

53. Moreover, I may run out of stamps, and preventing 6 new law suits is important, and it is even more important to prevent the overthrow of the government.

54. Per the attached letter dated September 3, 2022 to PA Office of Disciplinary Counsel (“PA ODC”) at Exhibit W, I filed in the US District Court for the Eastern District of PA on October 12, 2022 I averred I was retired in PA prior to the disciplinary proceeding. The letter shows I was seeking to persuade PA ODC to stay proceedings as no harm would result since I was not licensed to practice in his state as I have been retired. Moreover the rules do not permit him to discipline me as not ripe until I would apply for admission, albeit I argued this in later pleadings.

55. The Eastern District Court had knowledge I was retired even before the PA Supreme Court disciplined me and instituted the proceeding. The letter shows knowledge I was retired before PA-ODC instigated reciprocal discipline.

56. I also attach other documents docketed in the Third Circuit matter Kelly v Eastern District of PA Number 22-3372 showing courts retaliated against me to cover up court mistakes of misfiling or other errors in other cases or matters on appeal, labeled found at DI 55 in the Third Circuit Starting with the Exhibit page P 1-79, docketed on 22-3372 at 3DI-55, which includes:

- Letters from US Supreme Court showing my first attempt to file a petition in the Delaware case was rejected since I filed an application for permission to use more pages prior to and not simultaneously with the petition. This is to show good faith. I asserted and was not sitting on rights to exercise my First Amendment right to petition,
- US Supreme Court docket showing Judge Phipp's denial of a stay caused an obstacle so great as to deny me the right to petition the original DE Disciplinary order, as I even tried to seek to preserve my right at the US Supreme Court, but the court would not hear me until it was too late to grant relief.
- Exhibit Q Letter to Clerk of Court for the Third Circuit for this Civil rights case, noticing a misfiled document at Third Circuit Docket Item 76, mailed for the Third Circuit disciplinary matter filed in error in the civil rights case despite my notice to the Court and the case manager by email and phone calls that it was coming by US mail.
- Exhibit R Respondent Meghan Kelly's Motion pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike DI 77 as misfiled to be rescanned in to the Correct Matter No. 22-8037, without lifting my motion for a stay
- Exhibit S Petitioner Plaintiff Meghan Kelly's Corrected Second Motion pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike 3DI 77 as misfiled to be rescanned in to the Correct Matter No. 22-8037, without lifting my motion for a stay



- Exhibit T Petitioner Plaintiff Meghan Kelly's Motion pursuant to Rule 40 for a panel Reargument on Order Dated August 31, 2022, and move for a Judge, not the Clerk of the Court to render an order on this Motion for Reagument, and her Corrected Second Motion pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike 3DI 77 as misfiled to be rescanned in to the Correct Matter No. 22- 8037, without lifting my motion for a stay, and Motion to strike 3DI 77, and exhibits thereto, and related document, due to the fact I brought up mistakes or potential misconduct by the clerk's office to correct, to preserve impartiality
- Postage receipt at Third Circuit DI 77 page 234 filed on August 22, 2022, showing the Clerk order threatening sanctions in retaliation for my pleadings to correct the Court's misfiling of the documents based on a lie, that I allegedly filed them through the emergency email, when on the docket it shows I filed them via US Mail, and indicated the same to my case manager Pamela Batts, by prior notice via email and calls, and actual postage proof, in bad faith meant to cause me to forgo petitioning on appeal, or preserving the record with the Third, since the DE District Court's kind staff indicated the US Supreme Court could not see the district Court's docket unless I placed it on the appellate court's docket. I cannot afford to print out and mail the entire relevant docket and intend to seek to appeal on the record to dispense of the need of an appendix should my appeal be heard by the US Supreme Court.
- Appellant Respondent Meghan Kelly's Motion to Correct the Record, specifically District Court Docket Item, DI 12 under Rule 10 (e)(2)(c) and Rule 27 in the Eastern District of PA, US District Court to correct 1000s of misfiled pages

- Another pro se claimants' documents filed in the District Court, Eastern District of PA case Number 22-45, at Docket Items 12-45, 12-46 and 12-47, including medical records.

57. I want to reiterate how vital people staff are to the administration of justice.

People make mistakes, even court staff at times. That does not mean we need to punish people who make mistakes. Correcting our mistakes improves the administration of justice.

58. I have been clear about my belief there is a lobbyists agenda to eliminate people staff and people judges. When I sought to correct the record, I merely desires to assert my rights to a fair and accurate record. I did not desire to destroy the court, but require fair proceedings for myself and others. That means we need people staff and people judges.

59. In my appellate brief I noted. (3DI 98):

“I also preserve issues relating to the Third Circuit’s Orders and conduct, done to chill or punish my exercise of my right to petition in defense of my first amendment rights I preserve for appeal. I am concerned that my case manager may have misled me to my detriment to eliminate the case by encouraging me to file a motion for an extension of time only to deny it by failing to present it to the Clerk or the Court until the due date. On October 20, 2022, I pointed to the rule that allows 7 days to fix delinquencies in filing a brief to safeguard procedural due process by providing notice and opportunity to correct errors. See, 3d Cir. L.A.R. 107.2(b). I argue, 7 days is not enough to protect my meaningful opportunity to be heard and procedural due process rights under the 5th Amendment applicable to this Federal Court, under the facts of my case. My case manager indicated I could file a motion for additional time. I am not so sure the clerk would grant additional time in light of my last conversation. (3DI-96).

In my motion and corrected motion for an extension of time I indicate the importance of having people as opposed to automation to correct filing errors by the Court. I believe Court staff and judges will be reduced in number to be eliminated as schemed by participants in the World government summit and World economic forum by automation of standardized professions, including the practice of law. (3DI-95-96) I also pointed to other filing errors by other courts. Id. Errors are not the problem. Failure to correct them or retaliation against those who point them out or make them, is the problem. The Disciplinary case was brought in retaliation against me for asking the Court to correct government violations of my Constitutional right to freely exercise my religious-political beliefs, religious-political beliefs, speech, association, by exercising my right to petition to safeguard these rights from government infringement. On the record I point to retaliation by the courts, including yet not limited to the Delaware Supreme Court to correct its own or its agent or the government’s agent as a problem. The retaliation discourages citizens, including me, from exercising their right to access to

the courts to petition the courts to correct the Court's own errors or violations of law or errors by its arms or agents. This is one reason for this case. (DI. 2-4, 43, See, attached Dec 11, 2020 letter)

I also note, the Third Circuit Court chilled my meaningful access to the courts by discouraging me from contacting the Court more than once a day in an Order in retaliation for my motions to correct the Third Circuit's record to prevent irreparable prejudice against me. The Court also discouraged me from correcting motions, as other lawyers do in the common course of filing pleadings, especially in emergencies. The Third Circuit threatened me with sanctions which violate my religious beliefs in Jesus against debt. (3DI-90). During that time, my case manager was out on the civil rights case, and my case manager was out on the other case before the Third Circuit.

I note with prejudice that the Third Circuit's Order I sought reconsideration from is based on a false assumption, a misleading statement, that appears to be made in bad faith to cover up the Court's error that I filed an emergency motion when the record shows I mailed in the documents I sought to remove from the record. ( 3-DI 86-90). There is proof of postage. (3DI 87-10-11) I incorporate by reference my petitions to correct the filings, and related motions including but not limited to (3DI 87-88).

This is unacceptable. The courts are not above the Constitution. The Courts' goal is not to safeguard its mere appearance of justice by compromising actual justice which guarantees injustice. The Courts are not a business. Judges should not be concerned with their appearance or their self-serving desire to market their value or legitimacy, which eliminates impartiality by making the court's focus on fickle fads, and pleasing the mob, and doing what serves their seats instead of doing what is right, impartially under Constitutional law.

I desire to safeguard the integrity of the Courts by requiring they do not sacrifice people, and their individual exercise of their Constitutional rights, as the Defendants seek to sacrifice me for the exercise of my rights. I seek to preserve the integrity of the courts not destroy them. I do not seek to destroy this Court or the Delaware Chancery Court or the Delaware Supreme Court, but I do seek to hold them to the letter of the Constitutional law. If I am disparately treated in bad faith to fix the outcome or to throw out my case in various forums for the mere convenience of the court, or with malice and disdain towards me for my religious-political beliefs, speech, association or petitions, than others also may be unlawfully chilled by the Courts from exercising their right to access to the courts in defense of fundamental rights. (DI 2-4) Such precedent in my case creates a danger to the public to serve mere business greed, profit, power and position, not good by respecting all without disparate treatment based on income or belief. I object to misleading statements noted on the Third Circuit's record made with intent to chill my exercise of the right to petition, even to petition to make corrections, in defense of my fundamental rights, or to prejudice my appeal. (3DI-77-90)" (3DI 98)

59. I believe I may have special standing to prevent regulation of the US Supreme Court meant to eliminate the US Supreme Court members positions down the line because of the retaliation by the Delaware Supreme Court, Judge Diamond, and the Third Circuit Court of

appeals with its threat of sanctions in response to my petitions to preserve the record for appeal or to correct the record. I must argue attorneys must be permitted to correct judges in 1. Cases or controversies or in impeachments to preserve the only Constitutional means to correct judges without waiver to preserve the integrity of the courts and the impartial just rule of law from schemed elimination.

60. I do not seek to destroy the courts. I seek to hold the courts to the Constitutional application of the rule of law to preserve my liberty and the liberties of citizens so their Constitutional liberties are protected from schemed similar elimination under the threat of not buying and selling down the line.

61. The banks and businesses, and other entities will judge in place of judges. The carbon credits and debts judged by the private partners, corporations, entities, especially the new type of beneficial entities I believe mislead people to hell by Matthew 6:1-4 violations, and central and other banks will take the place of people judges and be above the law and be considered the letter if left unstopped by the courts. See My complaint where I alluded to these beneficial entities created in more than 33 states.

Thank you for your time and consideration.

Respectfully submitted,

Dated 8/28/23

Meghan M. Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)  
(302) 493-6693

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

Dated: 8/28/2023

Meghan Kelly (printed)

Meghan Kelly (signed)

Table of Contents 73<sup>rd</sup> Affidavit

**Exhibit A** Notice of Appeal filed with the Third Circuit to appeal the case Kelly v US District Court for the Eastern District of PA, Third Circuit Case Number 22-3372, District Court Case Number 22-45

**Exhibit B** Notice of Appeal filed in the Eastern District Court of PA, with some documents out of the order I mailed them

- Notice of Appeal
- 2 Letters from US Supreme Court regarding Motion to Stay discipline is returned. There is no discipline by the US Supreme Court
- With certified of service and postage along with an email to Case Manager of Eastern District of PA Court indicating the US Supreme Court is not instituting discipline
- [I do not know why this was filed with the notice of appeal]
- Exhibits A, B, C Orders, looks like one was placed on twice. The staff misfiled documents I sought to correct in other Docket Items. I did not catch these.

**Exhibit B-2** Petitioner Meghan Kelly Affidavit in Support of Recusal of Judge Phipps, and Judge Scirica pursuant to 28 U.S.C. § 144 from Kelly v US District Court Eastern District of PA 22-3372 and affidavits taken from the Delaware District court Civil rights case, excluding others placed on the other docket under different DI numbers or left off placed on the 3<sup>rd</sup> Circuit case Kelly v US District Court Eastern District of PA at 3DI 49-50

**Exhibit 1** PLAINTIFF MEGHAN KELLY'S 41st AFFIDAVIT UPDATE,

**Exhibit 2** PLAINTIFF MEGHAN KELLY'S 43rd AFFIDAVIT UPDATE,

**Exhibit 3** PLAINTIFF MEGHAN KELLY'S 44th AFFIDAVIT UPDATE,

**Exhibit 4** PLAINTIFF MEGHAN KELLY'S 45th AFFIDAVIT UPDATE,

**Exhibit 5** PLAINTIFF MEGHAN KELLY'S 46th AFFIDAVIT UPDATE, dated June 11, 2023

**Exhibit 6** PLAINTIFF MEGHAN KELLY'S 46th AFFIDAVIT UPDATE date June 18, 2023 [accidentally named them the same]

**Exhibit 7** PLAINTIFF MEGHAN KELLY'S 48th AFFIDAVIT UPDATE

**Exhibit 8** PLAINTIFF MEGHAN KELLY'S 49th AFFIDAVIT UPDATE

**Exhibit 9** PLAINTIFF MEGHAN KELLY'S 50th AFFIDAVIT UPDATE

**Exhibit 10** PLAINTIFF MEGHAN KELLY'S 51st AFFIDAVIT UPDATE

**Exhibit 11** PLAINTIFF MEGHAN KELLY'S 52nd AFFIDAVIT UPDATE

**Exhibit 12** Plaintiff Meghan M Kelly's **Second** Motion to stay the Proceeding until the conclusion of Respondent's originating disciplinary proceeding until a final non-appealable determination is made or the time of appeal has lapsed. Plaintiff further moves the Court, for good cause for permission to file an Amended complaint 30 days after the stay is lifted in this Civil rights case



- Exhibit 13** PLAINTIFF MEGHAN KELLY'S THIRD AFFIDAVIT UPDATE
- Exhibit 14** PLAINTIFF MEGHAN KELLY'S FIFTH AFFIDAVIT UPDATE
- Exhibit 15** PLAINTIFF MEGHAN KELLY'S TWENTY FIRST AFFIDAVIT UPDATE
- Exhibit 16** PLAINTIFF MEGHAN KELLY'S 46th AFFIDAVIT UPDATE
- Exhibit 17** PLAINTIFF MEGHAN KELLY'S TWENTY SECOND AFFIDAVIT UPDATE
- Exhibit 18** PLAINTIFF MEGHAN KELLY'S 37th AFFIDAVIT UPDATE
- Exhibit 19** PLAINTIFF MEGHAN KELLY'S FIFTEENTH AFFIDAVIT UPDATE

**Exhibit C** August 24, 2023 Case opening documents for an amended appeal meant to preserve my right to contest an appealable order for remand or on the reopening in Kelly v Eastern District of PA, No. 22-3372, The Third Circuit set me up, which I am not falling for. My amended appeal was made in good faith to preserve the record. Another appeal is frivolous meant to set me up to fall.

**Exhibit D** E-mail from file and serve confirming the DE Supreme court sealed Motions necessary for my appeal in Kelly v Trump, necessary for my defense in the future disciplinary proceeding and all related proceedings to conceal evidence in my favor and to conceal the Constitutional and statutory violations of the law by members of the Delaware Supreme Court including but not limited to witness tampering forwarded to Judge Diamond and Case Manager Gail Olson.

**Exhibit E** Motion DE SUPREME Court wrongly sealed in *Kelly v Trump* called *APPELLANT'S MOTION FOR THE DELAWARE SUPREME COURT TO REIN IN ITS ARMS THROUGH ITS AGENTS FROM UNLAWFULLY PRESSURING APPELLANT TO FORGO OR IMPEDE HER CASE TO PROTECT HER FREE EXERCISE OF RELIGION. BY RELIEF IT DEEMS JUST*

**Exhibit F** Motion DE SUPREME Court wrongly sealed in *Kelly v Trump* called *APPELLANT'S MOTION FOR THE DELAWARE SUPREME COURT TO REQUIRE THE RECUSAL OF THE HONORABLE CHIEF JUSTICE COLLINS J. SEITZ, JUNIOR IN THIS MATTER*

**Exhibit G** First Letter to Delaware Supreme Court Chief Justice Seitz dated January 7, 2021 wherein I requested an exemption or waiver of bar due payments for all attorneys facing economic hardship during the pandemic

**Exhibit H** Plaintiff's Motion for Reargument at DI 20 DE District Ct Matter 21-1490 dated Nov 6, 2021, filed November 8, 2021

**Exhibit I** Plaintiff's Motion to Amend Plaintiff's Motion for reargument at District Court DI 21, dated November 8, 2021, filed November 9, 2021 at District Court DI 21, dated November 8, 2021, filed November 9, 2021

**Exhibit J** Amended Motion for reargument at dismissal DI 21-2 pages 13-24 of 38 pages, dated November 8, 2021, received November 9, 2021

**Exhibit K** *PLAINTIFF'S MOTION TO AMEND FINDINGS OF FACTS AND ALTER THE ORDER, DATED DECEMBER 22, 2021, BASED ON NEW FINDINGS OF FACT, TO PREVENT, CLEAR ERROR OF FACTS, CLEAR ERROR OF LAW, AND TO PREVENT MANIFEST INJUSTICE* at DI 34-35 of Kelly v Swartz Delawares District Court dated January 10, 2022, docketed January 11, 2022

**Exhibit L** *TABLE OF CONTENTS OF EXHIBITS TO PLAINTIFF'S MOTION TO AMEND FINDINGS OF FACTS AND ALTER THE ORDER, DATED DECEMBER 22, 2021, BASED ON NEW FINDINGS OF FACT, TO PREVENT, CLEAR ERROR OF FACTS, CLEAR ERROR OF LAW, AND TO PREVENT MANIFEST INJUSTICE* at DI 34-35 of Kelly v Swartz Delawares District Court dated January 10, 2022, docketed January 11, 2022

**Exhibit M** *PLAINTIFF'S SECOND ADDITIONAL MOTION PURSUANT TO FRCP R. 52(b), 59(e) and 60(b)(1)(2)(6) TO AMEND FINDINGS OF FACTS AND ALTER THE ORDER, DATED DECEMBER 22, 2021, BASED ON NEW FINDINGS OF FACT, TO PREVENT, CLEAR ERROR OF FACTS, CLEAR ERROR OF LAW, AND TO PREVENT MANIFEST INJUSTICE* at DE District Court Docket Number 39, dated January 18, 2022, filed January 19, 2022

**Exhibit N** Table of contents for the exhibits to PLAINTIFF'S SECOND ADDITIONAL MOTION PURSUANT TO FRCP R. 52(b), 59(e) and 60(b)(1)(2)(6) TO AMEND FINDINGS OF FACTS AND ALTER THE ORDER, DATED DECEMBER 22, 2021, BASED ON NEW FINDINGS OF FACT, TO PREVENT, CLEAR ERROR OF FACTS, CLEAR ERROR OF LAW, AND TO PREVENT MANIFEST INJUSTICE at DE District Court Docket Number 39, dated January 18, 2022, filed January 19, 2022

**Exhibit O** *PLAINTIFF MEGHAN M. KELLY'S 3rd EMERGENCY MOTION PURSUANT TO FRCP R. 52(b), 59 (e), 60(b)(1)(2)(6), and 65* at Kelly v Swartz et al. DE District Court DI 36, dated January 19, 2022, filed January 19, 2022, also filed on January 21, 2022

**Exhibit P** April 26, 2022 letter where I indicated witnesses have been removed from the ourt to conceal evidence in my favor, and I indicated my intent to amend the complaint to inter alias make Constitutional arguments against disciplinary rules or proceedings, Docket item 58 in Kelly v wartz

**Exhibit Q** Table of contents for August 26, 2022 letter at DI 58

**Exhibit R** Respondent Meghan Kelly's Motion for good cause, 1 Pursuant to Supreme Court Rule 9, to Unseal the Record, 2. to declare self-regulation of attorneys, other Professions, and judges unconstitutional, making business above the law, by making the dictates of professionals, or bureaucrats within agencies, as opposed to laws enacted by congress people, checked by the vote of the people, the law, and 3. in lieu of and in the alternative, eliminate the secret trial

requirements of professionals before Boards, including the Board on Professional Responsibility, requiring the choice of an open or confidential forum left to the accused professional, instead of requiring a secret proceeding, concealing the accused's defense, to the advantage of the accuser state, in violation of equal protections, and due process 1<sup>st</sup> and 14<sup>th</sup> Protections

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

**Exhibit T** Respondent Meghan M Kelly's Motion for permission to use electronic filing, and waiver of paper copies before this Honorable Court, and an exemption from PACER costs to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, and compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights

**Exhibit U** Email from Lisa Dolphe, the Clerk of the Delaware Supreme Court declining me access to the documents and pleadings against me in a case appointing counsel, dated January 10, 2023, meant to conceal the fact my First Amendment right to petition and 14<sup>th</sup> Amendment procedural due process fair access to the courts was denied by foreseeably denying my petitions and refusing to docket my pleadings in full defending my 1<sup>st</sup> and 6<sup>th</sup> Amendment right to self-represent under religious grounds

**Exhibit V** Email dated August 24, 2023 at 10:24 AM wherein I request opposing counsel's position on an additional extension of time beyond the 30 days.

**Exhibit W** Letter to the PA ODC requesting a stay of proceedings of reciprocal discipline prior to initiating the proceeding noticing I am retired, dated September 3, 2022, and there is no harm to the public or him since I am not licensed to actively practice law in PA.

Exhibits docketed on 22-3372 at 3DI-55 at **Exhibit P** through other exhibits page 1 through 79

Letters from US Supreme Court showing my first attempt to file a petition in the Delaware case was rejected since I filed an application for permission to use more pages prior to and not simultaneously with the petition

US Supreme Court docket showing Judge Phipp's denial of a stay caused an obstacle so great as to deny me the right to petition the original DE Disciplinary order, as I even tried to seek to preserve my right at the US Supreme Court, but the court would not hear me until it was too late to grant relief.

**Exhibit Q** Letter to Clerk of Court for the Third Circuit for this Civil rights case, noticing a misfiled document at Third Circuit Docket Item 76, mailed for the Third Circuit disciplinary matter filed in error in the civil rights case despite my notice to the Court and the case manager by email and phone calls that it was coming by US mail.

**Exhibit R** Respondent Meghan Kelly's Motion pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike DI 77 as misfiled to be rescanned in to the Correct Matter No. 22-8037, without lifting my motion for a stay

**Exhibit S** Petitioner Plaintiff Meghan Kelly's Corrected Second Motion pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike 3DI 77 as misfiled to be rescanned in to the Correct Matter No. 22-8037, without lifting my motion for a stay

**Exhibit T** Petitioner Plaintiff Meghan Kelly's Motion pursuant to Rule 40 for a panel Reargument on Order Dated August 31, 2022, and move for a Judge, not the Clerk of the Court to render an order on this Motion for Reagument, and her Corrected Second Motion pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike 3DI 77 as misfiled to be rescanned in to the Correct Matter No. 22-8037, without lifting my motion for a stay, and Motion to strike 3DI 77, and exhibits thereto, and related document, **due to the fact I brought up mistakes or potential misconduct by the clerk's office to correct, to preserve impartiality**

Postage receipt at Third Circuit DI 77 page 234 filed on August 22, 2022, showing the Clerk order threatening sanctions in retaliation for my pleadings to correct the Court's misfiling of the documents based on a lie, that I allegedly filed them through the emergency email, when on the docket it shows I filed them via US Mail, and indicated the same to my case manager, by prior notice via email and calls, and actual postage proof, in bad faith meant to cause me to forgo petitioning on appeal, or preserving the record with the Third, since the DE District Court's kind staff indicated the US Supreme Court could not see the district Court's docket unless I placed it on the appellate court's docket. I cannot afford to print out and mail the entire relevant docket and intend to seek to appeal on the record to dispense of the need of an appendix

Appellant Respondent Meghan Kelly's Motion to Correct the Record, specifically District Court Docket Item, DI 12 under Rule 10 (e)(2)(c) and Rule 27 in the Eastern District of PA, US District Court to correct 1000s of misfiled pages

Another pro se claimants' documents filed in the District Court, Eastern District of PA case Number 22-45, at Docket Items 12-45, 12-46 and 12-47, including medical records.

# Exhibit A

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	§	APPEALS COURT
Respondent.	§	CASE NUMBER: _____
	§	DISTRICT COURT
	§	Misc. No. 22-45
v.	§	DISTRICT COURT
United States District Court,	§	JUDGE: The Honorable Paul D.
Eastern District of Pennsylvania	§	Paul S. Diamond, Judge

**Notice of Appeal**

Notice is hereby given that Meghan Kelly who proceeds pro se appeals to the United States Court of Appeals for the Third Circuit from the Order entered on November 18, 2022, at Exhibit A. There is a previous Order by the Eastern District Court to review the merits of at Exhibit B, dated November 17, 2022. There is another previous Order by the Eastern District Court to review the merits of at Exhibit C There is no opinion to publish.

Dated: Dec. 11, 2022

Respectfully submitted,

*Meghan Kelly*  
/s/Meghan Kelly

Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
(302) 493-6693

Retired Bar No. 202268, INACTIVE, not  
practicing law on behalf of another



# Exhibit B

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	§	APPEALS COURT
Respondent.	§	CASE NUMBER: _____
	§	DISTRICT COURT
	§	Misc. No. 22-45
v.	§	DISTRICT COURT
United States District Court,	§	JUDGE: The Honorable Paul D.
Eastern District of Pennsylvania	§	Paul S. Diamond, Judge

**Notice of Appeal**

Notice is hereby given that Meghan Kelly who proceeds pro se appeals to the United States Court of Appeals for the Third Circuit from the Order entered on November 18, 2022, at Exhibit A. There is a previous Order by the Eastern District Court to review the merits of at Exhibit B, dated November 17, 2022. There is another previous Order by the Eastern District Court to review the merits of at Exhibit C There is no opinion to publish.

Dated: Dec. 11, 2022

Respectfully submitted,



/s/Meghan Kelly

Meghan Kelly, Esquire

34012 Shawnee Drive

Dagsboro, DE 19939

meghankellyesq@yahoo.com

(302) 493-6693

Retired Bar No. 202268, INACTIVE, not practicing law on behalf of another

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

Dated: Dec. 11, 2022

Meghan Kelly (printed)

Meghan Kelly (signed)

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	§	APPEALS COURT
Respondent.	§	CASE NUMBER: _____
	§	DISTRICT COURT
	§	Misc. No. 22-45
v.	§	DISTRICT COURT
United States District Court,	§	JUDGE: The Honorable Paul D.
Eastern District of Pennsylvania	§	Paul S. Diamond, Judge

**Certificate of Service of  
Notice of Appeal**

I, Appellant Plaintiff Meghan M. Kelly, Esquire, hereby certify that on  
December 11, 2022, I had a true and correct copy of the above referenced  
document sent via US mail, by placing the same in the mail although today is  
Sunday to,

United States District Court for the Eastern District of Pennsylvania  
14614 U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106

Dated December 11, 2022

Respectfully submitted,  
/s/Meghan Kelly  
Meghan Kelly, Esquire  
DE Bar Number 4968  
34012 Shawnee Drive  
Dagsboro, DE 19939  
(302) 493-6693

meghankellyesq@yahoo.com  
US Supreme Court Bar No. 283696  
Not acting as an attorney on behalf of  
another

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

Dated: December 11, 2022

Meghan Kielly (printed)

Meghan Kielly (signed)

rec. Dec. 10  
by postman.

**SUPREME COURT OF THE UNITED STATES  
OFFICE OF THE CLERK  
WASHINGTON, DC 20543-0001**

December 5, 2022

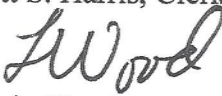
Meghan Kelly  
34012 Shawnee Drive  
Dagsboro, DE 19939

RE: Motion to stay reciprocal discipline

Dear Ms. Kelly:

Your motion to stay reciprocal discipline, and related papers, are herewith returned.

This Court does not have a disciplinary action pending against you. If such an action is initiated, you will be given an opportunity to show cause why reciprocal discipline should not be imposed.

Sincerely,  
Scott S. Harris, Clerk  
By:   
Laurie Wood  
(202) 479-3031

Enclosures



## Enclosures



U.S. POSTAGE PAID  
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ORDER FREE SUPPLIES ONLINE

FROM:

Meghan Kelly  
34012 Shawnee Dr  
Dassboro, DE 19939

TO:

Clerk of Court  
Supreme Court of the United  
States, 1 First Street, NE  
Washington, DC 20543

11/29/2022 8:27:04 AM

To: CLE CLERKS MAILRO



To schedule free Package Pickup,  
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USPS TRACKING



No. \_\_\_\_\_  
\_\_\_\_\_

IN THE SUPREME COURT OF THE UNITED STATES

Meghan M. Kelly, Petitioner

v.

Office of Disciplinary Counsel, Respondent

On Appeal from the Delaware Supreme Court, Case No. 2022, 58

Certificate of Service of Petitioner Meghan M. Kelly's Motion to stay reciprocal discipline pending a final determination on appeals or until appeals have lapsed for disciplinary cases, reciprocal disciplinary cases and her civil rights case in which she seeks to void the original Delaware disciplinary determination

I Meghan Kelly, Esq., certify that on 11/22/22, I sent the above

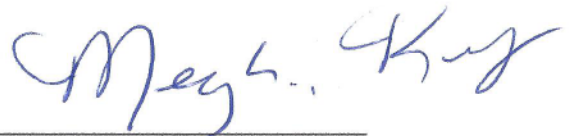
referenced document to the following addressee via First Class mail:

KATHLEEN M. VAVALA  
Disciplinary Counsel  
Supreme Court of the State of Delaware  
The Renaissance Centre  
405 North King St., Ste. 500  
Wilmington, DE 19801

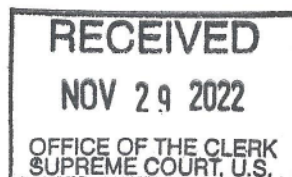
Dated

Nov. 22, 2022

Respectfully submitted,



Meghan Kelly, Esquire  
DE Bar Number 4968  
Inactive license



34012 Shawnee Drive  
Dagsboro, DE 19939  
[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)  
Retired in PA 202268, inactive  
Not acting as an attorney on behalf of  
another

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

Dated:

Nov. 27, 2022

Meghan Kelly

(printed)

Meghan Kelly

(signed)



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MEDIUM FLAT RATE  
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COM®  
IN LINE

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<b>P</b>	<b>US POSTAGE PAID</b> <b>\$17.05</b>	Origin: 19970 11/22/22 0953900970-05
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13 Lb 0.4 Oz <b>RDC 04</b>		<b>EXPECTED DELIVERY DAY: 11/25/22</b>
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		9505 5149 9863 2326 9406 71
		

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ID: 11 x 8.5 x 5.5  
OD: 11.25 x 8.75 x 6  
ODCUFT: 0.341


<b>PS00011000000</b>

<b>P</b>	<b>COMMERCIAL BASE PRICING</b>
<b>USPS PRIORITY MAIL</b>	
MAILROOM US SUPREME COURT OF THE UNITED STATES 1111 1ST ST NE WASHINGTON DC 20543	
<b>SHIP TO:</b> MEGHAN KELLY 34012 SHANNON DRIVE DAGSBORO DE 19939	<b>USPS TRACKING #</b> 
9205 5902 4503 8800 0000 2603 65	
ELECTRONIC RATE APPROVED #902450388	
BOX 1 OF 1 Priority Mail is a registered trademark of the U.S. Postal Service	



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**From:** Meg Kelly <meghankellyesq@yahoo.com>  
**Sent:** Wednesday, December 14, 2022 9:01 AM  
**To:** PAED Documents  
**Cc:** Meg Kelly  
**Subject:** Part 1 of 2 Fwd: Notice of appeal of In re Meghan Kelly 22-45  
**Attachments:** Notice of appeal dated Dec 11.pdf; Cert of service notice to eastern district Court.pdf; letter dated Dec 5 rec Dec 10 US Sup ct.pdf

**CAUTION - EXTERNAL:**

Good morning,

Could you please docket this.

It should have been received by US mail yesterday. The case manager could not confirm receipt. She is out of the office today and tomorrow.

Thank you,  
Meg Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939  
Meghankellyesq@yahoo.com  
(302) 493-6693  
Retired from PA 202268  
Sent from my iPhone

Begin forwarded message:

**From:** Meg Kelly <meghankellyesq@yahoo.com>  
**Date:** December 11, 2022 at 5:32:40 PM EST  
**To:** "Chambers of Judge Paul S. Diamond" <chambers\_of\_judge\_paul\_s\_diamond@paed.uscourts.gov>  
**Cc:** Meg Kelly <meghankellyesq@yahoo.com>, Gail Olson <Gail\_Olson@paed.uscourts.gov>  
**Subject:** Notice of appeal of In re Meghan Kelly 22-45

Good evening,

Attached, please find the notice of appeal of the above referenced matter I sent this Court by placing the same in the US mail this Sunday, December 11, 2022.

I discovered errors as a matter of law after I had a brief time to research. I also might be able to use this case to prevent third party or self regulation and end of life time limits which creates partiality to the regulations as opposed to the impartial rule of law.

I gained more time to appeal two disciplinary orders before the US Supreme Court, but I require more time in this appeal to the Third Circuit.

The US Supreme Court is not instituting a disability proceeding per the attached order.



I was hoping to use the Third Circuit Court of appeal's disciplinary order to argue against federal judge regulation, but I am getting slammed by another reciprocal suit where two motions were rejected last week.

Your case may allow me to make an argument if I included my Delaware motions against self regulation and third party regulation. I hope I did.

Thank you. I hope you have a good week.

Very truly,  
Meg  
Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
(302) 493-6693  
Retired License 202268 PA  
Not acting as an attorney

**CAUTION - EXTERNAL EMAIL:** This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.

# Exhibit A

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN THE MATTER OF

MEGHAN MARIE KELLY

Misc. No. 22-45

## ORDER

It appears that Respondent Meghan Kelly has “retired” from the Pennsylvania Bar. The Disciplinary Board of the Sup. Ct. of Pa., <https://www.padisiplinaryboard.org/for-the-public/find-attorney/attorney-detail/202268>. If so, she likely is no longer qualified to be a member of our Bar. See Local R. Civ. P. 83.5(a) (“Any attorney who is a member in good standing of the bar of the Supreme Court of Pennsylvania may, by a verified application and upon motion of a member of the bar of this Court, make application to be admitted generally as an attorney of the Court.”); Id. at 83.5(a) cmt.2 (“Under the rule as currently formulated only attorneys admitted to practice by and in good standing with the Supreme Court of Pennsylvania are qualified for plenary admission to the Eastern District’s federal bar.”). Respondent shall thus explain to the Court how she can remain a member of our Bar if she is no longer “a member in good standing of the bar of the Supreme Court of Pennsylvania.” Id. at 83.5(a).

**AND NOW**, this 17th day of November, 2022, it is hereby **ORDERED** that Respondent shall submit a Memorandum of Law in which she addresses how she can remain a member of the Bar of the Eastern District of Pennsylvania when she is currently retired from the Pennsylvania Bar. Respondent shall submit the Memorandum **no later than noon, December 1, 2022**. The Court will act in the absence of a Memorandum if Respondent fails to submit one in accordance with this Order.

The proceedings respecting the imposition of reciprocal discipline are stayed pending further Order of Court.

**AND IT IS SO ORDERED.**

*/s/ Paul S. Diamond*

\_\_\_\_\_  
Paul S. Diamond, J.

# Exhibit B

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN THE MATTER OF

MEGHAN MARIE KELLY

:  
:  
:

Misc. No. 22-45

**ORDER**

It appears that Respondent Meghan Kelly has “retired” from the Pennsylvania Bar. The Disciplinary Board of the Sup. Ct. of Pa., <https://www.padisciplinaryboard.org/for-the-public/find-attorney/attorney-detail/202268>. If so, she likely is no longer qualified to be a member of our Bar. See Local R. Civ. P. 83.5(a) (“Any attorney who is a member in good standing of the bar of the Supreme Court of Pennsylvania may, by a verified application and upon motion of a member of the bar of this Court, make application to be admitted generally as an attorney of the Court.”); Id. at 83.5(a) cmt.2 (“Under the rule as currently formulated only attorneys admitted to practice by and in good standing with the Supreme Court of Pennsylvania are qualified for plenary admission to the Eastern District’s federal bar.”). Respondent shall thus explain to the Court how she can remain a member of our Bar if she is no longer “a member in good standing of the bar of the Supreme Court of Pennsylvania.” Id. at 83.5(a).

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The proceedings respecting the imposition of reciprocal discipline are stayed pending further Order of Court.

**AND IT IS SO ORDERED.**

*/s/ Paul S. Diamond*

\_\_\_\_\_  
Paul S. Diamond, J.



# Exhibit C

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN THE MATTER OF : MISCELLANEOUS  
MEGHAN MARIE KELLY : No. 22-45

---

**NOTICE**

AND NOW, this 3rd day of November, 2022, please take note that a **HEARING** in the above-captioned matter is **SCHEDULED** for **January 9, 2023** at **11:00 a.m.** **THE HEARING WILL TAKE PLACE VIRTUALLY.** You may have counsel represent you at the hearing.

ATTEST:

or BY THE COURT:

/s/ Richard C. Thieme  
BY: \_\_\_\_\_  
Richard C. Thieme  
Deputy Clerk

\_\_\_\_\_  
Paul S. Diamond, J.

cc: Honorable Gerald J. Pappert  
Honorable John M. Gallagher  
Meghan Marie Kelly

---

**From:** Meg Kelly <meghankellyesq@yahoo.com>  
**Sent:** Wednesday, December 14, 2022 9:08 AM  
**To:** PAED Documents  
**Cc:** Meg Kelly  
**Subject:** Part 2 of 2 Fwd: exhibit orders / Notice of appeal of In re Meghan Kelly 22-45  
**Attachments:** Exhibits A B C to notice.pdf

**CAUTION - EXTERNAL:**

Good morning,

Please see attached. I mailed this court the notice of appeal too. I am concerned about mail getting delayed in the Christmas crunch. I expected the notice of appeal to be received yesterday.

The pro se clerk and the case manager could not confirm receipt.

I am sending the notice to you by efilng it by email in order to assert and not waive my rights by the exercise of the utmost caution, due to the 30 day time constraint which is approaching.

On an aside, my computer broke. I am sending this by phone. Please excuse any typos or autocorrects.

Thank you,  
Meg  
Meghan Kelly  
34012 Shawnee Dr  
Dagsboro, DE 19939  
Meghankellyesq@yahoo.com  
Retired PA bar 202268

Sent from my iPhone

Begin forwarded message:

**From:** Meg Kelly <meghankellyesq@yahoo.com>  
**Date:** December 12, 2022 at 6:51:24 AM EST  
**To:** "Chambers of Judge Paul S. Diamond" <chambers\_of\_judge\_paul\_s\_diamond@paed.uscourts.gov>  
**Cc:** Gail Olson <Gail\_Olson@paed.uscourts.gov>, Meg Kelly <meghankellyesq@yahoo.com>  
**Subject:** Re: exhibit orders / Notice of appeal of In re Meghan Kelly 22-45

Good morning,

I apologise. The exhibits to the order did not make it. They are attached hereto. Thank you.

Very truly,  
Meg  
Very truly,  
Meg  
Meghan Kelly  
34012 Shawnee Dr.

Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
(302) 493-6693  
Retired License 202268 PA  
Not acting as an attorney

On Sunday, December 11, 2022 at 05:32:40 PM EST, Meg Kelly <meghankellyesq@yahoo.com> wrote:

Good evening,

Attached, please find the notice of appeal of the above referenced matter I sent this Court by placing the same in the US mail this Sunday, December 11, 2022.

I discovered errors as a matter of law after I had a brief time to research. I also might be able to use this case to prevent third party or self regulation and end of life time limits which creates partiality to the regulations as opposed to the impartial rule of law.

I gained more time to appeal two disciplinary orders before the US Supreme Court, but I require more time in this appeal to the Third Circuit.

The US Supreme Court is not instituting a disability proceeding per the attached order.

I was hoping to use the Third Circuit Court of appeal's disciplinary order to argue against federal judge regulation, but I am getting slammed by another reciprocal suit where two motions were rejected last week.

Your case may allow me to make an argument if I included my Delaware motions against self regulation and third party regulation. I hope I did.

Thank you. I hope you have a good week.

Very truly,  
Meg  
Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
(302) 493-6693  
Retired License 202268 PA  
Not acting as an attorney

**CAUTION - EXTERNAL EMAIL:** This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.

# Exhibit B-2

(affidavit from Kelly v US District Court Eastern District of PA 22-3372 and affidavits taken from this court, excluding others placed on the other docket under Different DI numbers or left off placed on the 3<sup>rd</sup> Circuit case Kelly v US District Court Eastern District of PA at 3DI 49-50 )

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	§	APPEALS COURT
Respondent.	§	CASE NUMBER: 22:37372
	§	DISTRICT COURT
	§	Misc. No. 22-45
v.	§	DISTRICT COURT
United States District Court,	§	Judge Paul S. Diamond
Eastern District of Pennsylvania	§	

Petitioner Meghan Kelly Affidavit in Support of Recusal of Judge Phipps, and Judge Scirica

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

1. I certify this affidavit is made in good faith to prevent manifest injustice against me by vitiating my Constitutional rights by bias and prejudice so great by Judge Scirica and Judge Phipps in favor of an adverse party or adverse ruling that I respectfully request their recusal in this matter pursuant to 28 U.S.C. § 144

2. 28 U.S.C. § 144 provides, “ The affidavit shall state the facts and the reasons for the belief that bias or prejudice exists, and shall be filed not less than ten days before the beginning of the term at which the proceeding is to be heard, or good cause shall be shown for failure to file it within such time.”

3. Good cause is shown by excusable neglect in that I did not know I was required to file an affidavit. Due to poverty, and health issues I have limited ability to research.

4. Moreover, I was taken aback that Judge Phipps had the boldness to serve as a member of the panel adjudicating my matter in this case given the grave prejudice I alerted the Court to in the Civil Rights case and this case prior to the June 30, 2023 Order wherein I learned he is the member of the panel who ruled against me.

5. I was taken by surprise, given the notice of my legitimate concern that Judge Phipps’ acting as a member of the panel actually granting an adverse decision based on actual

prejudice relating to a conflict of interest so great as to tempt the common person to rule against me as he did.

5. I move for good cause for this court to accept this affidavit.

6. I unfortunately did not realize the requirement when I filed a similar motion in this Court in the Civil rights case, given the voluminous pressures I apprised this court that I faced.

7. I dare not file an addendum in the Civil Rights case now. This court has chilled my First Amendment right to petition by substantial burdens in the form of government threats of compelled religious violations against my religious belief against debt, given poverty and my assertion of the 13<sup>th</sup> Amendment, and my assertion of obstacles to my access to resources including research which causes a substantial burden to my access to this Court and the exercise of my 1<sup>st</sup> Amendment right to petition, to bend my will to the States by force of the fires oh hell, not freely. US Amend I, V.

8. I truly believe those who create debt slavery by compelled force, not a meeting of minds, or any debt sins. Those who are enslaved to debt are tempted to go to hell by making money savior and God. Jesus teaches you cannot serve God and money. *Matthew* 6:24. It is my religious exercise of belief to serve God, not money. I believe churches teach people to go to hell when they collect money as savior for others, which is the mark of the beast. In *Matthew* 6:1-54, Jesus teaches us to give alms in secret or not all. Jesus teaches, do not give to get. Giving out of one hand to get out of the other teaches people business is love or charity. This lie damns people to hell by teaching them to love money to extract money from one another, driving out love for one another replaced with the love of material gain under the false belief business is contributing good, charity or love. I believe Jesus teaches people go to hell for organized



charity, fundraising, exploiting child labor by selling girl scout cookies and volunteering because in *Matthew* 6:1-4, Jesus teaches “You will have no reward from your father.” I believe the only reward we have from God is eternal life and the riches of saving other people’s souls from hell to share a fuller type of love with God the last day for an eternity in heaven. God is awesome. In his parable where laborers worked for different amounts of time but gained the same pay, God shows us the glorious wisdom that we may all receive the same salvation, a fuller type of love with God, not more or less than those who became saved from their sin at the end with little time doing what was right in the eyes of God. This humility helps us to love others without resentment, to look at people as the wonderful treasure they are, not moth and rust, or our own works. God is smart. He drives out the sin of Satan pride with eternal life saving humility and mercy that saves us from the default the second death to be no more.

9. If Judge Phipps is removed and any ruling is granted in my favor, Judge Phipps is clean of that and should not be punished by Trump. Judge Phipps appeared to expressed his immediate indication that he does not necessarily agree with me in response to my initial brief in the other matter. Yet, it appears Judge Phipps desires the Court to be clear and to be made clean of law suits whose rulings in my favor harm his prospects at nomination to the USSC.

10. I only discovered Judge Phipps became a member of the panel on my case on June 30, 2023

11. I was taken aback in light of the conflict of interest I noticed the Courts about contained in the Civil rights case, *Kelly v Swartz*, 22-3198 and in this case on June 30, 2023 when I filed a motion to recuse 4 judges. Judge Phipps rendered adverse orders against me in the civil rights case. It is prejudicial to have the same judge, Judge Phipps, to determine different issues on related matters where the advocate in the other case speaks in his mind if not on the

papers, prejudicing me with the false allegations by the State of Delaware's counsel and the false allegations of the Delaware Supreme Court asserted to claim the real issues of discrimination against me based on my genuine not fake belief in Jesus and to cover up years of State Court misconduct. Jesus teaches people commit lawlessness when they judge based on mere appearance or marketing instead of rightly. See, *John 7:24*.

12. Actual prejudices occurred in that Judge Phipps ruled against me unexpectedly by unreasonably denying a stay or additional time on June 30, 2023 in this case. My case manager told me the Court would grant me time. I relied on her comfort that I was okay to my detriment.

13. In bad faith this Court appeared to ruin a weekend where loved ones came for the 4<sup>th</sup> of July in the area by increasing pressure given the substantial burden of poverty, health, religious objection to debt, lack of time, no access to Westlaw or Lexis at home and other burdens by rendering orders in two cases against me prior to a holiday weekend, where the law library would be closed.

14. I cannot tell my parents bad news without rebuke. I called them, told them and they threatened to cut off my phone and kick me out. My parents get upset easily. They have already indicated they intend to cut off my inheritance because of these law suits. Whether the threats are real or just parents indicating I cannot turn to them when problems arise I do not know. I know that I was scolded for calling them in college if I ever needed things like proof reading. I am sorry I am a poor typist. I seek to practice real estate not litigation with my former firm by overturning the DE Order.

15. Over the weekend, my mom indicated she intended to cut off my phone since I alerted her there were orders against me. She did it before. I noticed this Court of that in affidavits in the DE District Court, she may do it again.

16. I love my parents very much. I am grateful to them, but I love God even more, and will stand up for my faith in Jesus Christ even though the courts appear to threaten me with death and bodily harm by not accommodating me based on my asserted religious right to live and not die for the lawless lusts and vanity of men cloaked in the color of law or otherwise.

17. In my affidavits I told this Court I assert my right to live and not die for the sinful convenience or other vanity of the court and government based on exercise of my religious belief to live for God, and not die for mere men which is damnation in hell by making men God.

18. I required time and asserted and required accommodation when I did not face all of the substantial burdens I face now. My health has diminished, and I assert my religious belief and religious exercise of required to retore my health and sustain what cannot be restored. My condition and health show good cause, especially given this Court knows I suffered an eye injury and has should have reviewed the papers on that.

19. I have gained weight too. After my mom's best friend said I looked anorexic I felt so ugly and ate more hoping to become womanlier since my surgery seemed to stilt my growth, only to gain fat in ugly places. This has never happened before. I have maintained the same weight for more than 25 years before this 2023.

20. In high school, I had surgery where the doctor removed my ovary. The doctor said I would only have my period every other month. He was wrong. I had it every month, and every month I became dangerously dehydrated requiring gallons not cups of water, rest and exercise in order not to collapse, faint or die.

21. I still require this. It has never gotten better. It seemed to be the same for the past 20 years. But it got worse and is worse during this litigation. My health has worsened due to the fact none of the courts accommodate me to prevent irreparable injury in terms of loss of my fundamental rights and my property interests, even harm to body, life and potential loss of eternal life.

22. I know that I must assert my right to time, rest and exercise. After the surgery in my youth I fainted. I learned to prevent fainting due to severe dehydration I had to drink gallons of water, rest and exercise. Drinking unusual amounts of water is the most important accommodation.

23. One time I blacked out and peed my pants in a class in college. Everyone left me, I awoke on the floor of a UD classroom all alone after the class in Western medicine.

24. In undergrad and law school I took classes and healthcare and learned how wicked and evil most care was in that it harmed people, and I believe damned people to hell. I have religious objections against healthcare, mental healthcare, carelessly referring people to professionals or to purchase products because I believe it teaches people man, man's work, including technology, science or money to pay for a product or service is savior instead of God's Word, misleading most of humanity on the path to hell. I also believe people to go to hell for blindly doing what they are trained to do, paid to do, or told to do when they harden their heads and hearts from caring to know how their products or practices oppress or harm others. Not knowing, believing a lie, confusion, misunderstanding is guilt to God. See *Math* 13. *2 Cor* 4:4, *Hosea* 4:6. I believe Courts can help the blind see, and the dumb hear to help people know in order to turn away from sin to be saved from certain destruction in the fires of hell as being too disgusting to live for valuing moth and rust at the cost of sacrificing the life or liberty of another

person God loves. I oppose human sacrifice for material gain, even knowledge by science. I have religious objections on anyone collecting data on me or statistics. I also believe people sin for cremation, using others peoples' organs or blood samples for testing or otherwise. See *Amos* 2:1. Jesus teaches us through the holy spirit to judge correctly to discern children of the devil from children of God. *Matthew* 12:34-38. God teaches most people are children of the desolate one, the evil one, sadly without eternal life. (Isaiah 54, more are the children of the desolate woman than of her who has a husband") Jesus teaches the way to gain eternal life is hard, and few people escape hell. See *Matthew* 7:13-15, *Luke* 13:23-28. God commands us not to obey the traditions of men to violate God's law. *Mark* 7:8. The Bible teaches me keep myself separate by not sinning merely for the convenience or pleasure of the world. *Romans* 12:2.

25. I proposed ways to improve healthcare when I ran for office in 2018, which I incorporate herein by reference.

26. I believe people go to hell for their careless words, should they not repent. *Matthew* 12:35-37. I believe people sin for telling other people to pay for a product or pay for a professional to eliminate problems by those who sustain positions and profit so long as the problem is managed and not eliminated. *Romans* 1:25 This makes money to pay a professional, man or man's science or work God in place of God. *Matthew* 6:24.

27. I have religious objections to healthcare and I believe people go to hell for believing all mental health theories which are based on scientific conditions also known as temptations which teach people's will to be bent not free in Christ, reflecting the image of the devil and his children.

28. I am licensed to teach 6 subjects. I studied courses on psychology and behavioral and mental health theories. I believe so many mental theories I had to learn to gain my license

teach children to go to hell, to be the evil, by chasing happiness, their hearts, to be enslaved not free but controlled and managed by those who entice their desires by reward or threat of harm to bend their substantially burdened will to the dictates of mere men in place of God. Kids learn not to think things out, not give into temptation of immediate gratification and happiness. They do not learn to lay down their desires to love God and love others as themselves. God teaches our body is not our own. Our bodies are temples, and are Gods. It is a sin to destroy our bodies for mere man or money by what others sell or give us. God teaches those who destroy his temple, people's bodies will be destroyed in hell for loving mammon more than God by respecting his desire that we love one another without human sacrifice for material gain even the lie of sustaining the world. Business is not the sin. Human oppression, sacrifice of life or liberty for convenience and material gain is sin because people love what they can get, moth and rust more than one another untampered by love written in the hearts of the born again or the just rule of law. I especially oppose BF Skinner which taught the mark of the beast. He taught the lie there was no unconditional love, and that people lived solely based on conditions of reward and avoidance of harm to be controlled without free will by those who enticed their desires by conditions, also known as temptations.

29. During the lawsuits the dehydration has increased resulting to my inability to restore my health.

30. On the record, I noticed this court, PA and the district courts as well as the USSC that I collapsed on the floor of the post office due to severe dehydration. I requested a stay based on need, physical need. None of the courts cared about upholding my fundamental right to live, my religious belief to live and not die by human sacrifice for mammon of the courts and government.

31. I asserted and did not waive my rights at any time. Despite that the courts create substantial burdens and harm to my health.

32. During the original disciplinary proceeding, I asserted my rights, and was compelled to attend a hearing as I recovered from the shingles and allergies without time to prepare, my asserted right to perform discovery, subpoena witnesses and other vitiation of my asserted and not waived fundamental rights.

33. I told the DE Court in Kelly v Democrats, Kelly v Trump and the Disciplinary matter that I faint and may die if I am not afforded accommodations by attaching the same Exhibit 43 I provided this Court. They knew or should known that I assert a right to fair proceeding giving my personal abilities to sustain life and health and not die by human sacrifice for the vanity of the state who doesn't care about life or health unless we attorneys or parties demand it.

34. This Court is aware that I injured my eye and lost vision, and my eye is blurry by severe dryness.

35. The Courts have disregarded my asserted rights, including my right to live, the superseding Constitutional laws and statutes in my cases. The Delaware Supreme Court members have behaved above the law in the disciplinary case by firing witnesses, concealing evidence in my favor to fix the sham proceedings against me.

36. In my cases I see how lawless lusts not the impartial rule of line reign.

37. I do not think disciplining judges is the answer. I think attorney advocates have a duty to uphold the rule of law when judges vitiate it in cases and controversies including my Civil Rights case, and this case where the lower Court booby trapped me. I think the courts must



encourage attorneys to fulfill their duty of upholding the Constitutional rights of the public, the people and the attorney's own rights without fear of vindictive retaliation by the courts.

38. Business, professional licensure should not supersede the Constitutional rights of private citizens, even me as a private party with a professional license to practice law.

39. I write under duress. My health has diminished.

40. On Monday, July 3, 2023 I called my case manager in this case. She indicated her surprise. She did not expect the court not to deny time. She said Courts usually grant time even less time. We were both taken aghast.

41. My case manager indicated she was not going to be in July 4, or July 5<sup>th</sup> but I could email her or call the Court since this is due by or before July 5, 2023.

42. I have limited time, and require a stay in order to defend my faith in Jesus, not money or material gain as God to be controlled by those who control resources instead of to freely lay down my desires and needs to do what is right, the will of God love to overcome lusts.

43. This Court denied me time, and I have to file a motion for reconsideration by July 14<sup>th</sup> should this court not grant consideration of the motions by a new panel pursuant to my requests in the motion accompanying this affidavit.

44. The substantial burdens due to other law suits, health, debt, familial situation, time, unexpected surprise are good cause under the circumstances to consider this affidavit.

48. Judge Phipps' conflict is so great a reasonable person would conclude bias or prejudice in my case under the facts.

49. Judge Phipps was placed on a list of potential nominees to the US Supreme Court by President Trump.

50. Donald J. Trump ("Trump") is running to become President of the United States in 2024.

51. I believe Trump will likely be reelected.

52. Trump will likely nominate Judge Phipps again should a Supreme Court Justice retire

53. The Delaware Office of Disciplinary Counsel state they brought the Disciplinary proceeding against me for suing President Trump. The Delaware Supreme Court cite my religious beliefs contained in my Religious Freedom Restoration Act petition against President Trump for the reason for the discipline.

54. I seek to overturn Kelly v Trump in the civil rights case. In addition, this case is based on my lawsuit against the one who may benefit Judge Phipps should he rule against me and essentially for Trump, by demeaning my law suit against Trump.

55. Phipps has a personal stake in my law suit. He has an interest in safeguarding Trump in order to gain a potential seat at the US Supreme Court.

56. This temptation to gain the most powerful seat on the planet, a position at the US Supreme Court is so great as to create a reasonable person to include there is an appearance of bias or there is actual bias against me in this case and in favor of the Government.

57. Judge Phipps also has other conflicts of interest I incorporate herein by reference in my June 20, 2023 Motion to recuse, and attachments thereto showing conflicts of interests.

58. Judge Phipps may also be offended by my religious belief that Trump misleads people to hell. Judge Phipps may also be offended I drafted 5 proposals to impeach President Trump 1. Based on his violations of criminal law 18 USC 227 for encouraging the firing of NFL players for peacefully exercising their First Amendment right to petition against alleged disparate

treatment against blacks within the criminal judicial system, 2. Violations of 18 USC 227 for encouraging economic harm to members of the press exercising their First Amendment Freedom, 3. An impeachment regarding the porn star activity by the President, 4 relating to kidnapping babies at the border, and profiting private partners by overcharging payments to their commitment facilities, 5. A proposal relating to the war powers act, I incorporate herein.

59. No one is above the law, nor is anyone below the law's correction with mercy, not even the President.

60. With regards to Judge Scirica, I was absolutely horrified terribly mortified to discover the conflict of interest rather recently. I outlined my concerns in the Delaware District Court case I incorporate herein by reference by referral to Kelly v Swartz, 21-1490.

61. I seek to destroy what Judge Scirica works on the disciplinary rules as chains that eliminate freedom under the illusion of upholding it by beholding judges to serve what I believe is the mark of lawlessness that misleads humanity to hell, business greed at the cost of human sacrifice of life or liberty.

62. I strongly oppose regulating the courts to partiality to business by barter or exchange. This urges the courts to serve greed not humanity or the liberty that allows beautiful disorder and criticism which helps us improve and gain humility needed to escape the certain default for most of humanity loss of eternal life due to pride.

63. I noted on the Delaware record my desire to prevent regulation of the USSC and my hope I could eliminate judicial discipline of federal judges.

64. Judge Scirica is the Chair on the rules of federal judicial discipline I seek to eliminate. He has a personal interest in ruling against me as I seek to overturn his hard work.

65. I also seek to amend my complaint to include Constitutional arguments against the DE disciplinary proceedings and certain Delaware Disciplinary Rules rules I argued on the record in the civil rights case.

66. These rules mirror the rules Judge Scirica works on, and attacks his work.

67. I sought to destroy the work of Jude Scirica first in the Civil rights case and now may seek to attack the rules he works on in this case.

68. In the Civil rights case, at Delaware District Court, Number 21-1490 Kelly v Trump, I alerted the Court of my concerns against Judicial discipline and the elimination of people judges or other hardship and concerns in the attached documents I incorporate herein by reference, and in additional Docket items 23, 53, 55, and 56 which I may not be able to upload in the DE District Court case.

69. I truly believe preventing the regulation of the US Supreme Court and eliminating the corrupt disciplinary rules against federal judges and requiring life term appointments for all federal judges, with the ability to choose different appointments would aid in preventing the schemed overthrow of the rule of law to eliminate it by automation by those who reign over people by the mark of the beast, business greed, with no unconditional love.

Thank you for your time and consideration.

Respectfully submitted,

Dated 7/4/23

Meghan M. Kelly

Meghan Kelly, Esquire  
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Dagsboro, DE 19939

[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)

(302) 493-6693, Not acting as a lawyer  
Defending my First Amendment private right to  
believe in Jesus Christ as God, not money or  
mammon as God

# Exhibit 1

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF MEGHAN KELLY'S 41st AFFIDAVIT UPDATE

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

1. I have a weather alert on my phone, so I was scared to file my motion for a rehearing tomorrow or Monday June 5, 2023 because the electricity may go out. See Exhibit A. the weather alert from yesterday June 2, 2023 which remains into effect today June 3, 2023.

2. On June 3, 2023 I filed the attached Motion for a rehearing before the original panel, attached hereto and incorporated herein as Exhibit B.

3. The original panel includes

1. Chief Justice Chagares appointed by President Bush with an Attorney General Experience,
2. Justice Scirica, a leading national expert of Attorney Disability per the attached exhibits contained in Exhibit C. He is a member of the US Judicial Conference. He serves as the Chair of its Committee on Judicial Conduct and disability. He also served as a UD Attorney General.
3. Justice Ambro who has worked at the largest home grown corporate law firm in the corporate center of the Universe Richards, Layton and Finger. Notably, this is my first law firm too. He also has experience in bankruptcy.



4. I am uncomfortable with the fact the Delaware Supreme Court is full of people with corporate law experience, and the federal courts are full of people with experience and expertise defending the big guys, entities or the government. The judges' specialty and training to defend government and collective entities may create an obstacle in preventing the government and entities from sacrificing individuals and individual liberty under the deception of the collective good.

5. The collective good is free speech that allows disorder and criticism to improve dumbed down training by standardization, especially when judges defer to medical standards that harm and kill patients instead of correcting them to improve the profession by safeguarding life and liberty foremost above profit and material gain.

6. With said, maybe the judges are cognizant of the new economic model, not based on profit but on debt control by private entities who will eliminate the government if left unstopped.

7. If you look at my Complaint at DI 2, you will see my criticism for the new beneficial entities which are used in a different ponzi scheme of taking what is not theirs' under the guise of charity or the common good. These beneficial entities will be used in the new economic system which eliminates the profit model, for a slave debt credit system.

8. The WEF already alluded to the elimination of saving accounts at page 144 of the Book the Fourth Industrial Revolution found at Docket Item 12 if I see it correctly. I attached Page 144 as Exhibit D to show the reduction of savings to my believed elimination of savings in the new techno slave credit debt economy schemed beyond 2030.

9. I am not blinding my eyes when people are schemed to be oppressed by those who gain unjust gains of resources to control and enslave the people and the government as

master only to eliminate the government which is charged with safeguarding individuals and individual liberty from those who sacrifice people and liberty for material gain like the religious groups used to throw people into volcanoes to secure good harvest and material gain.

10. I have a duty under the Constitution and before God to seek to safeguard free will, an individual liberty which will be substantially burdened with every freedom to be eliminated to be bought and sold by only those who may afford them.

11. I also am heartbroken and upset since the US Supreme Court appears to be making it difficult to see my appeal on its docket per the attached Exhibit E., possibly to conceal my genuinely held religious-political beliefs the certain cases violate the Constitution, and violate the laws of God, endangering the souls of the judges who render unjust decrees in the name of God. Isaiah 10:1-3 “Woe to those who make unjust laws, to those who issue oppressive decrees, to deprive the poor of their rights and withhold justice from the oppressed of my people, making widows their prey and robbing the fatherless.”

12. I am charged to correct and protect, even the courts to uphold the rule of law from the schemed lawlessness that lies ahead if the courts do not humble themselves to stop it.

13. We need the courts to be the heroes instead of the villains by protecting liberties of those they disagree with, even their seemed enemies.

14. The only check upon courts should be 1. Cases and controversies and 2. Impeachment, not disability or disciplinary proceedings.

15. The fact Justice Scirica is in charge of a committee to discipline judges is troubling since this is outside of the purview of the Constitutional limits.

16. I thank this Court, and opposing counsel. I am disappointed the panel overlooked the fact I included disciplinary orders and pleadings attached to my motions for reargument and

made legal arguments related to the new and additional information they appeared to have overlooked given the voluminous amount of materials. I also included the materials in other pleadings prior to the last Order appealed at DI 59-60.

17. I am distraught.

18. I thank Judge Colm F. Connelly, opposing counsel and the staff for everything you have done, your time and consideration.

19. I pray my case continues, but should it end on appeal at the US Supreme Court, I am not going to regret standing up for my faith in Jesus Christ, not money, as guide, master and God in my life. Matthew 6:24.

Thank you for your time.

Respectfully submitted,

Dated 6/3/23

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(302) 493-6693, Not acting as a lawyer

# Exhibit 2

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF MEGHAN KELLY'S 43rd AFFIDAVIT UPDATE

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

1. I am scared about being thrown away for my religious belief in God not money or mammon, material things like basic necessities as mater and savior in my life.

2. Wen Jesus says what profits a man to gain the world to lose his soul, I believe Jesus.

3. This is not legal argument just concern because I am stressed and scared.

4. One of the federal judges on the Third Circuit panel reviewing my pleadings, Judge Scirica, is in charge of the committee that disciplines federal judges,

5. I want the courts to rule such disciplinary rules are unconstitutional by making judges partial towards the interest of those who doll out or threaten federal judges with discipline instead of the impartial application of the Constitution to the statutory or judicial by case law, aka common law, rule of law. Judge Scirica appears to be in charge of all disciplinary rules and changes governing federal judges, with the exception of the US Supreme Court. There is a conflict of interest with my aims for justice and preservation of the constitution.

6. I believe the courts may preserve the judiciary to preserve the rule of law by limiting correction of federal judges to 1. Cases and controversies like my cases, or 2. Impeachment.

7. I also am stressed because I fear the Appellate court is not reading my pleadings since I attached pleadings contesting notice, requiring discovery, motions to subpoena witnesses, argued violations of constitutional rights in my motions for reargument and other motions before this Court. In addition, I alerted the appellate court of my belief and evidence of belief that the Delaware Supreme Court participated in, incited and colluded in witness tampering in Kelly v Trump and the Disciplinary case.

8. In my Informa pauperis on appeal at the Third Circuit Docket Item (hereinafter “3DI”) I attach hereto as Exhibit A I pled the issues on appeal are:

- I. Whether the District Court erred as a matter of law, overlooking or misunderstanding of the facts, and on Constitutional grounds in the Court’s November 2, 2021 order, and Memorandum of Law, dated November 2, 2021 in:
    1. Denying Plaintiff’s motion to expedite,
    2. Dismissing as moot Plaintiff’s motions for temporary restraining order and exemption from bond, preliminary injunction and exemption from bond, motion to e-file with waiver of costs, and motion to appear remotely, under the discretion of the court due to poverty and to protect the parties and the court during a global pandemic,
    3. Denying Plaintiff’s letter-motion for emergency relief with permission to serve such letter/motion to Defendants along with the Complaint and other motions through the US Marshall.
    4. Dismissing the case by abstaining under the Younger abstention doctrine, and
    5. ordering the clerk to close the case,
- Given the evidence shows the Delaware Supreme Court and Chancery Court or their members or agents incited or participated in the conspiracy to interfere, harass, or pressure me to forgo my case against former President Donald J. Trump, and substitution of President Biden for Donald J. Trump to protect my free exercise of religion, speech, and association from government sponsored persecution for such exercise, and to dissolve the establishment of government religion by seeking to enjoin former President Trump and current President Biden from enforcing executive orders creating a union of government-religious entity partnerships, including 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 based on a bought or bartered for partnership between government and religion, not based on safeguarding freedom from



forced government religion or forced relationships with religious entities to gain the bartered for government support through such religious entities.

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

The Chancery Court and Delaware Supreme Court's agents' or members' interference in Kelly v Trump, and participation in retaliation against me in instigating a petition to disbar me as an active attorney for the exercise of Constitutionally protected rights were motivated by their members' or agents' desire to suppress or demean or disapprove of my petitions, religious beliefs, speech, political association, and, or poverty in violation of the First Amendment applicable to the Defendants pursuant to the Fourteenth Amendment and in violation of 42 U.S.C. § 1985 (2)(b) or 42 U.S.C. § 1983.

The August 23, 2021 letter the District Court refers to in his memorandum refers to both Chancery Court and Delaware Supreme Court pleadings or petitions as the reason for the Defendants petition against me to disbar me as an active lawyer based on my faith in Jesus Christ, per paragraph 7, in the petition. Though it is remarkable that the District Court offers assurance of the Delaware Supreme Court's jurisdiction while omitting the reference to the petitions to the Delaware Supreme Court as the source the Office of Disciplinary noted for the reason to bring a petition against me.

I petitioned the Delaware Supreme Court to suspend lawyer fees for lawyers out of work during the pandemic. The Court denied my request, indicating they would make determinations on a case-by-case basis.

I made a second request, noting I could not ask the honorable court to violate the Constitution by selective application towards me, as an attorney within a similarly situated class of lawyers facing economic hardship in violation of the Equal Protections Clause applicable to the Court pursuant to the Fourteenth Amendment.

No response was given by the Delaware Supreme Court. I paid the fees. Two months later, De-Lapp an arm of the Delaware Supreme Court and co-conspirator with the Defendants threatened me, requiring a response to their desire to investigate me within 10 days, based on my request for a waiver of fees to the court. How did they know to retaliate against me for the petition, unless the Delaware Supreme Court or their agent told them? De-Lapp's agents obviously were not concerned about helping me pay for the attorney active license registration fees since I made such payment two months before they threatened me.

The Delaware Supreme Court may have had pure motives, concern for poverty by reporting my poverty to the arm. Those motives appeared to turn sour since the Delaware Supreme Court never responded to my second letter relating to relief from lawyer registration fees.

Recently, the Delaware Supreme Court agent ignored my requests to attend a Delaware CLE, which was unusual for her, and appeared to be in conspiracy to retaliate against me and black ball me from participating in activities open to Delaware barred lawyers, based on the petition Defendants brought against me concerning my belief in Jesus Christ.

In addition, one of the Delaware Supreme Court justices came into the law library and asked for federal court jury instructions, I believe to prepare to sue me or help a court agent to sue me.

The evidence shows a member of the Chancery Court appeared to seek to sabotage my case, by preventing me to almost miss my filing deadline, and by instructing me to cross off local counsel's address on my praecipe to prevent service, to prevent my case going forward based on her disagreement with my political, religious beliefs or to cover up mistakes or misbehavior. The same staff member appeared to write on my October 5, 2021 praecipes, and underline the praecipes I drafted on October 12, 2021 to testify and be a witness without cross examination for the appellate justices to gain clarification, instead of filing them as I presented them, unmarked. I do not want her to get into trouble.

In April, 2020, Judge Kenneth S. Clark of the Court of Common Pleas interrogated me at BJ's, a bulk grocery store, located in Millsboro, DE in a threatening matter, apparently backed by the Office of Disciplinary Counsel ("ODC"), disapproving of my religious beliefs and law suit.

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

Whether the Delaware District Court is the only court which may afford me a fair trial since the Chancery Court lacked jurisdiction to enjoin the Defendants' unlawful proceeding, as applied, since the facts arose in the Chancery and Delaware Supreme Courts, creating the appearance of lack of impartiality or actual partiality.

II. Whether the pleadings if accepted as true evidence the Delaware Supreme Court, the Preliminary Executive Committee, and Board of Professional Responsibility for the state of Delaware, lack subject matter jurisdiction due to illegality of the petition brought in retaliation against me for the exercise of my protected rights motivated by Defendants' desire to punish me based on my First Amendment exercise of the right to petition, associate, speak, exercise religion and, or poverty, requiring the issue to be remanded to the District Court.

III. Whether the pleadings if accepted as true evidence the Delaware Supreme Court, the Preliminary Executive Committee, and the Board of Professional Responsibility for the state of Delaware lack subject matter jurisdiction, based on violating my procedural and substantive due process grounds, as applied, since the Delaware Supreme Court appeared to participate in the Defendants' interference in my exercise of protected rights, and petition against me for the exercise of those rights, requiring the issue to be remanded to the District Court for consideration.

IV. Whether the Delaware Supreme Court, the Preliminary Executive Committee, and the Board of Professional Responsibility for the state of Delaware lack subject matter jurisdiction due to the fact the appellate court, the Delaware Supreme Court appeared to instigate, participate in the interference in my law suit Kelly v Trump, and the retaliatory procedure Defendants brought, denying me of a fair trial as I cannot ask the Delaware Supreme Court members to be witnesses, to ask them about their apparent participation,

in a case they preside over. Pursuant to Federal Rules of Evidence Rule 605, 28 U.S.C.A. 605, “The presiding judge[s] may not testify as a witness at the trial.”

Whether the evidence if accepted as pleaded evidence the members of the Delaware Supreme Court are material witnesses to the facts relating to the Defendants’ petition, and should dismiss or at least enjoin the petition based on lack of subject matter, to be remanded to the District Court.

V. Whether the petition must be dismissed by the Defendants under 28 USCS § 455 (b)(1) (5)(iv) and 28 USCS § 455, (a),(b)(1), since the Delaware Supreme Court members’ impartiality might be reasonably be questioned as the facts evidence the Delaware Supreme Court’s members or agents appeared to have instigated or participated in the ODC’s and their agents’ or co-arms interference with my case *Kelly v Trump*, and retaliation against me by bringing the petition I seek to enjoin, but for the exercise of protected freedoms, motivated to suppress my religious beliefs, speech and petitions.

VI. Whether the facts pled which were not discussed by the district court, if proved, would show the proceeding brought by Defendants, is unlawful as applied, and the issue should be remanded to the district court for consideration.

VII. Whether my claims for infliction of emotional distress and potential damages which were not discussed by the district Court, should be remanded to the district court for consideration.

VIII. Whether in the interest of justice, I should be permitted to include a claim for nominal damages against the Defendants, in light of the expedited nature and irreparable injury I face.”

9. I pointed to the issue I believe the Supreme Court incited the discipline in interference of *Kelly v Trump* as judge, witness and fact finding jury.

10. I attach my Appellate Brief at Third Circuit Court docket item 98 hereto as an exhibit. In my appellate brief page 15 I allege:

“The state court does not have subject matter jurisdiction or jurisdiction is voidable. The Younger abstention is not appropriate to enjoin a forum without subject matter jurisdiction. The Delaware Supreme Court is without jurisdiction for its violations of procedural and substantive due process. Its judgments must be deemed void. (*See, May v. Anderson*, 345 U.S. 528, 537 (1953) “It is void ... if it denies due process of law.”); (*Pease v. Rathbun-Jones Eng. Co.*, 243 U.S. 273, 276 (1917) Judgments “ are void for lack of due process of law, or should be set aside for error.”). The state-court does not have subject matter jurisdiction or jurisdiction is voidable. The Younger abstention is not appropriate to enjoin a forum without subject matter jurisdiction. The Delaware Supreme Court is without jurisdiction to rule on its own alleged violations of procedural and substantive due process, violations of First Amendment rights, conspiracy and collusion under 1985, or whether it had subject matter jurisdiction. Its judgments in *Kelly v Trump* and in the disciplinary cases may only be deemed void by the Federal District Court, not the state court.....”

Footnote 2 “Constr. Drilling, Inc. V. Chusid, No. 03-3786, 2005 WL 1111760, at \*3 (3d Cir. May 11, 2005) (The Third Circuit held, “A judgment may also be void if a court “acted in a manner inconsistent with due process of law.”); See Respondent’s Exhibits to the Hearing (“R-Ex”) Exhibits 35, 37 Part 2, 42, R 44”

11. In the attach Brief I allege at Page 16

I had no adequate opportunity to raise my federal claims in state court. I asserted Constitutional defenses. Nevertheless, the state court precluded my meaningful opportunity to be heard on my defenses and motions, prevented discovery, denied me the opportunity to call witnesses, denied me access to the law library, sealed pleadings to conceal evidence, and fired two witnesses to prevent their testimony in my favor to prejudice the proceeding against me. (DI 55, 70-75, 77) [maybe I should have directed the courts eyes to the motion to expedite and the motions for rehearings to see the attached documents, examine additional facts, and legal arguments but I did that in my motion for a rehearing]

“There was no opportunity to ask the Delaware Supreme Court to void its own decision in Kelly v Trump and the disciplinary matter or to seek equitable relief, money damages or nominal damages against itself and its agents and arms. I seek to sue the Delaware Supreme Court. They cannot decide the case against itself, because they are a defendant. The Delaware Supreme Court is partial to the state and itself. I am entitled to an impartial judge, in accordance with the 1st and 14<sup>th</sup> Amendment procedural and substantive Due Process protections.”

Footnote 3 “US Const. Amend I, V. (See, Schweiker v. McClure, 456 U.S. 188 (1982) reversed on other grounds; Gibson v. Berryhill, 411 U.S. 564, 570 (1973); Ward v Village of Monroeville, 409 US 57 61-62 (1972) (“Petitioner is entitled to a neutral and detached judge in the first instance.”); In Re Murchinson, 349 US 133, 136 (1955); Tumey v State of Ohio, 273 US 510 (1927); Withrow v. Larkin, 421 U.S. 35, 46 (1975); McCool v. Gehret, 657 A.2d 269, 277 and 280 (Del. 1995) (“ excluding evidence [in my case emails] of efforts to influence a witness' testimony [to exclude evidence] constitutes reversible error. ....“Opinion testimony by a judge creates the appearance of partiality on behalf of a litigant, is greatly prejudicial to the adverse party...”); Inc. v. Lopez, CIV. No. 14-1223 (PG) (D.P.R. Oct. 27, 2015); United Church of the Medical Center v. Medical Center Comm'n, 689 F.2d 693, 701 (7th Cir. 1982); Utica Packing Co. v. Block, 781 F.2d 71, 77 (6th Cir. 1986); Hammond v. Baldwin, 866 F.2d 172, 177 (6th Cir. 1989).”

12. I made other arguments and claims to void subject matter jurisdiction in my original appeal. I added two different arguments and ran out of room to add more case law showing the limited exclusive jurisdiction of the state forum which prohibits my federal claims in the disciplinary proceeding based on the limited subject matter jurisdiction of the Board and

Delaware Supreme Court in disciplinary proceedings. I also made a cool neat new argument relating to personal jurisdiction over the Supreme Court and its members.

13. I am scared since one judge has a conflict of interest with my beliefs in limiting correcting judges to the constitutional purview without waiver. I oppose regulating judges.

14. I do not want to be taken out and eliminated, potentially cancelled even by the US Supreme court who makes my pleadings invisible. I hope the removal of my items from the docket on appeal of the PA Order is just a mistake. I will contact them as I am grateful for the attempts, but fearful in case the blank docket was by design. Nicole Traini, the Clerk of the PA Supreme Court indicates the Court's Clerks talk with other courts which is not fair when the courts may be parties not merely judges .

15. It is also unfair that the federal government who has more resources has 60 days to Answer a complaint where common folk like me, a regular person, has fewer days. Since, one of the reviewing Appellate judges works in one of the federal rules committee may read this, maybe he can argue changing the rules that disadvantage the common person while creating an unfair advantage to government workers and agents possibly in violation of the Equal Protections Clause to safeguard life and liberty as opposed to government power would be more just and fair. Judge Scirica is a big deal. He has the power to change history by amending rules that control the federal courts.

16. I also write because I believe there is harm schemed. Money and might cannot save us, minds of brilliant judges and possibly brilliant lawyers like my opponents and US Attorney General David Weiss may save us.

17. When I ran for office I learned how icky organized charities, fundraising and lobbying was. It was dirty compromising good for evil for people to win. Compromising other

people's lives and liberty are not a matter of barter or exchange. People are not for sale. People are priceless. I believe people are misled to harm and damnation in hell for organized charity, fundraising, selling things for school boosters and girl scout cookies because they teach people the mark of the beast is charity, business greed driving out love from the hearts of men, replacing it with the love of money and material things, praise, profit or position, which is the mark of the beast.

18. In *Matthew* 6:1-4, Jesus teaches people will not go to heaven for alleged alms. "They will have no reward" for giving out of one hand to get out of the other," even for fun, connections, marketing, praise or tax breaks. Giving to get is business, not the sacrificial alms Jesus speaks of we are commanded to do in secret without acknowledgment.

19. I learned unelected lobbyists control government agendas. Elected officials sin against God by not using their own independent thinking skills, for being ruled over by lobbyists who like the devil, entice their desires to bend their will to their controlled agendas. I believe we all must use our own brains in order not to give into temptations to do what we want, in order to do what is right. Those who live based on fickle ever changing desires for happiness based on conditions are weak although the evil lawless one, the devil through his children misleads people to hell by teaching flexibility and evolution are strength. Giving into temptation despite the pretty word flexibility or ugly word evolution is slavery to sin and death in hell to be controlled by those who entice our desires by scientific conditions, not free in Jesus Christ.

20. Per the attached Exhibit C, please find a page of Covid 19, The Great Reset, by evidencing a lobbyist agenda to eliminate grocery stores. The book also discusses the elimination of retail brick and mortar stores.

21. Please see the attached publication Debt Overhang and the Retail Apocalypse, August 2022, By Jack Liebersohn, Ricardo Correa, and Martin Sicilian found at the Federal Reserve's Web site, <https://www.federalreserve.gov/econres/ifdp/debt-overhang-and-the-retail-apocalypse.htm>, attached hereto as Exhibit D, which discusses the retail apocalypse.

22. Please note, the hike in prices and decrease in volume is designed to push small business and retail stores into closing down.

23. The plan is to deplete the boomers' retirements by reducing the worth in their stocks by forcing stores they invest in to close down. The wealthy who are in the know of the agenda may write off losses from their off shore profits to avoid taxes.

24. Once the retail spaces are empty, investors may buy them on the cheap. The rich make more profit by buying cheap, to rent or sell high by contrived scheming design, not smarts or luck.

25. There are worse times schemed ahead beyond this tiny part in a much larger scheme.

26. I think only the courts may save people and governments, not money or might.

27. I believe judges are special and that justice in the courts is a command by God for a reason because the courts have the power to save lives and eternal lives. Amos 5:15.

28. I am scared. It is very scary that one of the judges is in charge of the disciplinary rules committee, in charge of disciplining judges. I believe the rules themselves make judges less fit to judge due to the risk of judicial partiality to pleasing those who administer the rules instead of independently critically thinking to uphold the impartial rule of law.

Thank you for your time.

Respectfully submitted,



Dated 6/4/23

Meghan M. Kelly  
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[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)  
(302) 493-6693, Not acting as a lawyer

# Exhibit 3

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF MEGHAN KELLY'S 44th AFFIDAVIT UPDATE

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

1. I write in haste because I am scared, and do not have time.
2. I apologize for the typos. I am a bad typist and am scared as I am punished for my faith in Jesus and Christ, and for standing up for the Constitutional rule of law from government violations.
3. I believe the rule of law is in danger. The courts and lawyer positions are in danger. I believe there is not only a scheme to transition the economic system into a credit debt deceptive techno-slavery system under the guise of saving the environment only rewarding destroying it for the power and profit of central banks and other private and foreign powers. I also believe there is a plan to slowly eliminate the rule of law to allow entities to do as they please without restraint to prevent them from oppressing, enslaving, killing, stealing and destroying human health, life and liberty for material gain.
4. I am a child of God. I see people, even enemies, as the treasure to safeguard and respect, not tools for material gain.
5. I believe people must use their own brain, their free will to escape the second death in hell. So, I seek to protect freedom of the people to think, to believe, to speak, associate

by the dictates of their conscience, not the dictates of the government, or those who control the resources of basic life by unjust gains.

6. Protecting people's freedom to believe differently than me, to criticize to allow us to learn from one another as opposed to force fed religious or secular beliefs is not only upholding my belief in Jesus as God, but it is upholding the Constitutional superseding laws.

7. I sent the email, attached hereto as Exhibit A to the US Supreme Court in which I stated:

"Good morning,  
Thank you for your attempts. I saw you allowed the name search to enable me to search the above referenced matter. However, when I click on the docket, it comes up blank per the attached documents labeled Exhibits B through E.

I also searched by case number 22-7695, and it came up blank too.

It is possible Robert Meek or another staff member requires time to link the application to the main docket number to place all items relating to the same subject matter.

Nevertheless, due the past alleged alleged technical issues this Court through its staff asserted created problems in another appeal, I am sending the filed documents, as of May 30, 2023 via email too.

Thank you,  
Meg  
Meghan Kelly  
34012 Shawnee Dr  
Dagsboro, DE 19939  
(302) 493-6693  
meghankellyesq@yahoo.com

Not acting as an attorney advocate acting on behalf of another. Defending my private right to religious belief in Jesus as savior and God not money and mammon, such as necessities as savior and God which I believe misleads people to loss of eternal life in the second death in hell for trust in moth and rust to care for their own to be enslaved not free in Jesus Christ by those who through unjust gains control resources money and material things such as water and such. (Jesus calls these people children of the devil)  
Thank you for your time."

8. I sent the Supreme Court my PA appeal Number 22-7695, and related documents in three additional emails, including one stating:

“Good morning,

Please see the attached for your convenience. Danny Bickle indicated this Court has technical issues with my documents, and I err on the side of precaution by sending the documents separately by email to prevent the irreparable injury should they be lost or deleted by mistake.

Thank you,  
Meg  
Meghan Kelly  
34012 Shawnee Dr  
Dagsboro, DE 19939  
(302) 493-6693  
meghankellyesq@yahoo.com

Not acting as an attorney advocate acting on behalf of another. Defending my private right to religious belief in Jesus as savior and God not money and mammon, such as necessities as savior and God which I believe misleads people to loss of eternal life in the second death in hell for trust in moth and rust to care for their own to be enslaved not free in Jesus Christ by those who through unjust gains control resources money and material things such as water and such. (Jesus calls these people children of the devil)”

9. I believe this Court may stifle the plans to eliminate the rule of law, the courts and people judges and people lawyers, and prevent the overthrow of the government, not the mere replacement of the economy, by in part upholding the Constitutional laws that restrains judicial, executive and congressional acts which violate the people’s liberty interests, in my case and others.

10. We do not have a mere Republic. We have a democratic republic, where two branches give us the illusion of fair representation by the vote. Albeit lobbyists buy this no longer free alleged interest or liberty in the vote creating disparate treatment arguably in violation of the 5<sup>th</sup> Amendment’s equal protections component as applied to the federal government and 14<sup>th</sup> Amendment applicable to the state and local governments, without even a discussion as to the concerns with the electoral college.

11. The executive and executive branch give us an alleged republic in the form of representation.

12. The judicial branch is the only branch that gives us freedom and a democracy in this Democratic-Republic.

13. The judicial branch is most important in balancing and restraining the other two branches to preserve the Constitutional liberties and lives of the American people from being sacrificed under the lie of the common Good or the guise of saving the world or the lie the vote is a waiver to eliminate other Constitutional rights for the collective good.

14. Your branch is most needed. Otherwise, we have no freedoms and are mere products to buy and sell by the government's private and foreign partners by contracts or treaties. The souls of other people are not for sale to serve lawless lusts, business greed, power, profit and position of those who exploit them under the lie of serving or helping them.

15. I believe there is an attack on judges to eliminate the judiciary to eliminate the rule of law, as I mentioned previously.

16. Should judges give into the temptation to behave as cowards and defensive, they will be controlled by those who entice their desires not free to uphold the freedoms of the people by the impartial application of the Constitution on the rule of law.

17. I believe the courts must limit the purview of correcting judges to the purview of the Constitutional limits without waiver, 1. Cases and controversies such as mine, 2. Or impeachment, to preserve these United States from schemed overthrow.

18. I am terrified, absolutely mortified that one of the reviewing judges is in charge of the rules disciplining the federal judges. I believe such rules guarantee injustice by judges who fear punishment and seek to uphold the mere rules to the extent they compromise the impartial rule of law.

19. I believe regulations will be used to assist the other two branches to exceed the Constitutional limits to impeach and control a no longer free, independent and impartial judiciary. This may be used to eliminate the courts down the line if left unstopped.

20. My case is not about vengeance, but correcting and protecting the Defendants and those they misguidedly harm, including my colleague. My colleague Richard Abbott, Esq. appears to be in trouble for requiring the government adhere to the impartial rule of law, including a county and the members of the Delaware Supreme Court without disparate economic treatment arguably in violation of the Equal Protections Clause applicable to state and county governments via the 14<sup>th</sup> Amendment.

21. I seek to preserve the Constitution, the rule of law, and the government from schemed very real threats of dissolution and demise.

22. Thank you for your time. I write in haste with tears in my eyes, because my voice may be cancelled out and eliminated by even the United States Supreme Court by concealing my pleadings too.

23. This Court may guide even misguided appellate judges to preserve the rule of law.

24. I believe this Court may preserve these United States should it only care to entertain the individual liberty interest of those who do not conform to the standardized beliefs and conduct of the alleged norm, like me.

Respectfully submitted,

Dated 6/5/23

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[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)  
(302) 493-6693, Not acting as a lawyer



# Exhibit 4

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF MEGHAN KELLY'S 45th AFFIDAVIT UPDATE

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

1. I write in haste because I am scared, and do not have time.
2. I apologize for the typos. I am a bad typist and am scared as I am punished for my faith in Jesus and Christ, and for standing up for the Constitutional rule of law from government violations.
3. I believe the government must dissolve partnerships with religious organizations to preserve freedom of religion.
4. I believe the government must dissolve partnerships with private and foreign powers, when such partnerships violate the Constitutional rights of the American people to preserve freedom, to prevent slavery of the people to serve partners' dictates, which eliminates free will.
5. Business is not freedom. I believe the attached article in Exhibit A discussing a case holding giving an employer the right to not pay for insurance that covers healthcare it disagrees with robs the employee of free choice of belief, backed by the government. <sup>1</sup>This may

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<sup>1</sup> On an aside, I cite articles since they are admissible as evidence under the periodical exception to hearsay of the Federal Rules of Evidence, Rule 803, (18). Similarly present sense impression, state of mind, and excited utterances are also admissible. Should anything happen to me, opposing counsel or US AG may be able to use these affidavits to prevent an economic crash and the planned unnatural fall of the US to preserve this government. I cited

possibly murder employees for money if alleged care really could sustain their life. The case eliminates freedom by government backing of buying and compelling beliefs upon employees to serve greed, not any personal individual good of employees. They save costs by potentially buying rights and selling the souls of the workers leading to potential death. It is government backed human sacrifice.

6. I believe people sin leading to the fires of hell for believing money is protected free speech or freedom should they not unharden their heads and hearts and repent. It is bought speech. Free speech is not for sale by barter or exchange which eliminates the freedom liberty component.

7. The focus on money as savior to care for their own family or others through business or organized charity drives out love from the hearts of men for God and others replaced with the love of money. The Bible teaches the love of money is the root of every evil. I believe God is not kidding.

8. Those who entice people to give into temptation by reward or threat of harm to bend their substantially burdened will serve lawless lusts, not Constitutional freedom, but control. I believe little kids are taught to go the way to hell by fundraisers, boosters and by selling girl scout cookies under the guise of good for evil greed, leading to their damnation in hell should they not be born again I believe judges commit lawlessness before the eyes of God for confusing lawless lusts with the impartial rule of law, by partiality towards profit, money and material gain as savior, as freedom and God. I believe it is enslavement to sin and death in the fires of hell, not freedom.

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newspapers in Kelly v Trump since I knew they were admissible as evidence under this exception not to be demeaned like this Court appeared to do in one of its orders. It is acceptable under the rules.

9. My religious beliefs are genuine. Those within the government whose eyes are evil by speaking of job creation enslave people to work for their private partners who receive unjust, disparate favoritism arguably violates the 5<sup>th</sup> Amendment Equal Protections component applicable to the federal government, and the 14<sup>th</sup> amendment equal protections based on First Amendment belief and exercise of beliefs applicable to the states. Plus, I believe it damns those who give or accept government contracts and grants to hell for unjust gains should they not repent. The Bible speaks of unjust gains. The impartial rule of law should be used to restrain businesses from creating subpar, polluting products. Just decrees not money is the solution to save lives and eternal lives. Money is not God. Matthew 6:24.

10. I believe people go to hell for teaching money is the solution through charities, business or fundraising making money God. Matthew 6:24.

11. That said, in recent news, per the attached newspaper article, labeled as Exhibit B, a state, Oklahoma, is allegedly allowing a religious school to receive 100 percent pay and backing through taxes. I believe this establishment of religion based on business, buying the backing of the church will damn many people to hell by teaching religion is a business that may be bought and owned by the government as opposed to a matter of Constitutionally protected free choice. See, *Flast v. Cohen*, 392 U.S. 83 (1968)(tax payer had standing to contest pay of tax money which conflicts with religious belief. Though I believe taxes under US Amend XVI violates God's teachings. The way money is coined is based on slavery, eliminating freedom by debt is in contravention of my faith in Jesus. I leave this issue aside).

12. I am quite upset. I do not want people to go to hell.

13. Part of the global plan is to demean religion as a mere business to eliminate diverse religions, making the mark of the beast, the twice dead, those without eternal life, lawless

lusts, business greed by barter or exchange under the guise of saving the world the only acceptable belief. This plan to make religion a business is to eliminate freedom of religion and religious belief in Jesus the Christ. (Please see attached Exhibit C where evidence of UN schemes are prevented. Please note I do not condone the preachers preaching, just citations. This preacher teaches people like me are naughty since I associate as a Catholic.)

14. Jesus teaches people who perform business as worship are not welcome in heaven. Citing John 2:16.

15. Most of the world in existence may be damned to hell by the temptation to worship the beast, business greed, (money and material gain as savior to care for their own as God through business or charity in place of God) if the courts do not dissolve the establishment of Government religion.

16. I am scared. I filed a motion to recuse Judge Scirica in both Third Circuit matters, this appeal and Kelly v Eastern District Court since I seek to attack attorney and judicial disciplinary rules on Constitutional grounds. See, Exhibit D

17. Judge Scirica is a big deal. Per the attached, he has the power to control and persuade the Supreme Court, making him possibly more powerful than the US Supreme Court.

18. That power is compromised when lobbyists seek to control a no longer intentent judiciary like mobsters by threats of discipline. Per the attached petition to members of the federal rules to discipline judges, lobbyists sought to gain control over the rules and judges by allowing non-attorneys to practice law without a license. (Exhibit E)

19. Recall, the reason I ran for office in 2018 is that out of state entities were practicing law without a license, messing up the chain of title on deeds, losing revenue for the state, and taking advantage of my deceased esteemed colleague Dick Goll, Esquire. No one

would stop it. So, I decided to run for office to stop it myself. **Maybe Judge Scirica may draft rules to stop entities from practicing law without a license, harming the public while making a mockery of the judicial system by acting above the law's reach.**

20. There is a plan to eliminate lawyers and judges by people who control technology through entities.

21. Defendant and PA ODC should protect the rule of law, the courts, the justice system and country by correcting and regulating these non-attorneys who destroy the fabric of the rule of law that holds the government together.

22. None of the Disciplinary rules allow Defendants to prevent harm and elimination of the rule of law to serve the lusts of those who may buy their will be done by eliminating every single freedom by making people for sale products.

23. Maybe I should have addressed the need to draft rules to prevent the overthrow of the courts and the government by adding rules relating to non-attorneys practicing law without a license on behalf of another to prevent the schemed unnatural overthrow of our government. Those who teach of the fall of America like the fall of Rome teach lies to mislead and deceive the public based on their ignorance or wicked vanities.

24. Our hope of the hero to save us, to save themselves is the courts not with money like a mobster, or might like a misbehaving biting kicking child, but with their brilliant minds, to care to think, to know, to do what is right, not immediately convenient or self-serving, only to harm themselves and others down the line.

25. I am concerned because my law school professor allegedly used a secretary in private practice, to give the Honorable Hardiman the same secretary. I am concerned because he

interviewed Justice Thomas too. I believe the rule of law should be governed by those who serve the people, not those with internal connections.

26. I am concerned since this same professor interviewed Justice Thomas, with whom I often disagree.

27. I disagree with Justice Thomas in the attached excerpt of his dissent of a recent voting rights case where the Supreme Court protected black voters from intentional contrived discrimination. (Exhibit F)

28. I am grateful the US Supreme Court allowed law suits under 1983 to prevent old people from being drugged up like vegetables easier to tend to be doomed to hell because I believe we must use our brains to go to heaven. The US Supreme Court saved lives, liberty and eternal lives in the attached excerpt of case. (Exhibit G).

29. My case manager said I would be granted time in response to my motion for more time to file an appeal in the appeal of the PA Eastern District Court case. My parents departed and are on their way here from Florida now. They are coming late due to this week's news on the air pollution in Delaware and North East allegedly to be caused by the Canadian fires.

30. I am relying on her comforting words so I may prepare for their arrival and spend time with loved ones.

31. Many of my cousins are lawyers. I think my Uncle Luke's daughter, Hannah is coming to Delaware for the reunion. Hannah Kelly is going to law school next year. Her big brother already completed law school at Duquesne and is in private practice. Her other brother Luke went to Duquesne on a soccer scholarship. He may still be attending school.

32. I am grateful Hannah is showing the world women are people to respect, not things or property or products to market items.



34. Per the attached article, Exhibit G, Saudi Arabia is artificially decreasing supply to increase the demand and prices. Everything will get more expensive in the fall. If the post office decreased prices, including stamps to a quarter, the price of shipping goods would be reduced, reducing the alleged manufactured cause of inflation. I told the post office about this over a decade ago, but no one listens to my ideas or does anything about it. Again, that is why I ran for office myself in 2018, to improve the world by doing something about problems, not using problems to serve my own agenda to serve my seat.

Thank you for your time and consideration.

Respectfully submitted,

Dated 6/9/23

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(302) 493-6693, Not acting as a lawyer

# Exhibit 5

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF MEGHAN KELLY'S 46th AFFIDAVIT UPDATE

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

1. I write in haste because I am scared, and do not have time.
2. I apologize for the typos. I am a bad typist and am scared as I am punished for my faith in Jesus and Christ, and for standing up for the Constitutional rule of law from government violations.
3. The US Supreme Court made my docket visible for Kelly v PA ODC, Number 22-7695 immediately in response to my emails, dated June 5, 2023.
4. I also asked the E-filing staff and Robert Meek to please link up the application relating to the same matter, Application A 22A981 to the docket Kelly v PA ODC 22-7695.
5. I called the case manager of the US Supreme Court, Lisa Nesbitt and simply asked form a return message on June 1, and followed up on June 2, 2023 leaving a request for a call back. I was compelled to send Robert Meek and the efiling on Monday June 5, 2023 when I did not hear back from her to prevent the needless filing of a motion to safeguard my Constitutional rights. Robert Meek and efiling immediately publicizing my petition per my email request.
6. I sent an email thanking Robert Meek and the efiling staff for making my case public, but I again requested they link the two docket items together to the same case.

7. On or about June 6, 2023, I left a more detailed message with Lisa Nesbitt, the US Supreme Court case manager for all cases, to please link up the two items together.

8. The application remains unlinked to the docket containing the petition.

9. I am overwhelmed in court and personal obligations.

10. My eyes are getting more floaters and I am at high risk for a retinal detachment. I believe dehydration increases the risk. I am alarmed by the worsening condition of my eyes. I have a simple eye appointment this week. Doctors indicated years ago if I see total black to come in immediately to prevent permanent blindness. That stuck with me because I do not want to become blind.

11. I am exhausted. I am asserting my rights imperfectly in order not to waive them under great duress, facing great irreparable injury, with little time to sleep and care for my health. I asserted my right to live in all courts.

12. My mom and dad are here. I love them. I am on thin ice. I am constantly scolded for suing Trump. I am in big trouble for even printing or working on anything.

13. My parents think my ideas are all bad, and are even tougher on me than this Honorable Court. I love them, but it is quite difficult, and I am in big trouble for upsetting him should I even talk of law suits.

14. My dad thinks my concern of an overthrow and my religious belief against science as a religion, instead of mere imperfect human study of God's work are folly. I love my dad and think he is the smartest man in the entire world, but I think God is smarter than my dad. So, I have to place my religious beliefs first, above my parents. In *Matthew* 10:37 Jesus teaches "Anyone who loves their father or mother more than me is not worthy of me; anyone who loves their son or daughter more than me is not worthy of me." I believe Jesus teaches people go to

hell for placing their kids first, family first, parents first above loving others as self, and above loving God even more than our own lives. I think putting family (like work or money) first is idolatry, making family's desires God in place of God.

15. There is evidence of lobbyists seeking to destroy our government by removing the rule of law administered by the only branch that safeguards our freedom and gives us a democracy, the judicial branch.

16. Gathering signatures and receiving or giving money to lobbyists also known as charities is against my religious belief, even to run for office or for school boosters. I believe it violates Jesus's teachings in *Matthew* 6:1-4 which misleads people to exploit others, harm people and be damned to hell. I do not think it is a small thing to participate in organized charity, fundraising or volunteering. My religious beliefs are genuine, even if this court disagrees with them like my family disagrees with me. I love them, but I love God more. If it comes to compromising my faith in Jesus, there is no compromise by barter or exchange even with my family. Jesus is not for sale. I am in tears now. I hope this court does not think I am dumb even if it should disagree with my religious beliefs. I am not asking the court too believe as I do. My case is about protecting my freedom to believe differently than most, to protect the freedom to believe by the dictates of my own conscience without government economic, social or physical persecution for believing in Jesus Christ based on the dictates of my conscience, not the dictates of misguided churches or politicians or other government officials, including the courts.

17. When I ran for office in 2018, I learned the candidates were not free to use their own brains to think things out to do what is right. Candidates were bought and compelled to spew the force-fed thoughts of the voters or the lobbyists who bought them by donations, signatures or support.

18. I am not the same. I choose to use my free will to independently critically think, to discern what is right or convenient, not people pleasing only to harm the people down the line to serve my seat. I choose to try to seek to repent when I mess up, to brainstorm when my ideas do not work to come up with different ideas. I do not choose to blindly trust men as God which leads to harm and damnation in hell for reliance on experts, professionals or scientists. It is adultery with God to make professionals God and guide in place of critically discerning information in light of what is right. See, *Romans* 2:15 (“They exchanged the truth about God for a lie, and worshiped and served created things [science, products, services, professionals like demi-gods] rather than the Creator.”)

19. Lobbyists are talking about eliminating people lawyers and people judges at the World Economic Forum and the World Government Summit.

20. This is not mere talk but planning, where China already has peopleless courts. The WEF book, the Fourth Industrial Revolution mentions reducing to eliminate lawyer jobs 2025-2027.

21. Sebastian Thrun already alludes to the elimination of people judges and people lawyers in this 2018 World Government Summit at <https://www.youtube.com/watch?v=NsdmPiBc9TI>.

22. I believe the Courts are in trouble. Meaning we are all in trouble since the courts protect individuals and individual liberty from being sacrificed under the lie of the common good through the vote. The Courts give us civilization with the just rule of law. The Courts protect us from human sacrifice of life and liberty within limits to prevent citizens from taking the life or liberty of others with the just rule of law. The Courts limit the other two branches by placing a check on congress and the president’s power to prevent human sacrifice, enslavement and

elimination of liberties for mammon, money and material gain as God. I believe worship of mammon reflects the mark or image of the beast of the beast spoken of in the bible.

23. I filed a motion for a caveat to her Motion for this Court to recuse Judge Scirica to move him for judicial consideration of drafting laws to prevent non-lawyers and non-judges from practicing law or taking the place of people judges without government authority with the Third Circuit attached hereto as Exhibit A.

24. I hope Judge Scirica drafts disciplinary rules authorizing state office of disciplinary counsel to sue non attorneys for practicing law without a **license in the courts, as opposed to before secret proceedings by professionals of a Board.**

25. I sought Judge Scirica's consideration of drafting disciplinary rules to grant the US Attorney General and possibly the state Office of disciplinary counsel authority to sue non judges acting as judges without government authority.

26. I forgot to make the request lawsuits be done in open court as opposed to a secret board proceeding. That is critical in drafting federal disciplinary rules on judges judging without government authority designed to take the place of the courts through business, alleged charities or not for profits, and the banks, or in the alternate to take the place of people judges in the name of equality by automating alleged justice.

27. This may preserve the integrity of the judiciary. I believe the attacks are real, done to intentionally replace the judiciary with automation to destroy the only branch that gives us freedom and a democracy in our democratic-republic leading to an overthrow.

28. I hope the courts save the rule of law that binds this Country together in our Democratic Republic to prevent the fall of the United States. We need the courts to save us.

Thank you for your time and consideration.



Respectfully submitted,

Dated 6/11/23

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(302) 493-6693, Not acting as a lawyer

# Exhibit 6

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF MEGHAN KELLY'S 46th AFFIDAVIT UPDATE

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

1. I write in haste because I am scared, and do not have time.
2. I apologize for the typos. I am a bad typist and am scared as I am punished for my faith in Jesus and Christ, and for standing up for the Constitutional rule of law from government violations.
3. The US Supreme Court bestowed kindness by scheduling the conference date September 26, 2023, per the attached for Kelly v PA ODC, Number 22-7695. (Exhibit A)
4. My application for the same matter is still not linked up like other cases have their applications linked up Application Number 22A981 per the attached docket sheet. (Exhibit B)
5. Maybe the Supreme Court found my religious belief that people go to hell for teaching money is guide, savior and God should they not be made clean by unhardening their heads and hearts.. I believe churches teach people to go to hell under the guise of heaven by organized collections to give to another. This teaches people to go to church to seek to give or get money as savior as God in place of Jesus. I believe this is worship of the beast sin, seeking money with the evil eye looking at others to contribute by societal, compelled, conditional pressure not true charity per Jesus *Matthew* 6:1-4.

6. Jesus teaches you cannot serve God and money. *Citing Matthew 6:24*. I choose to stand with God not misguided children of the devil who sacrifice individuals and individual liberties under the lie of the common good. This sacrificing of humans and individual liberty under the lie of saving the world will be used in the new economic system.

7. The new economic system is the opposite of freedom. I believe we each individually have to think things out and use our own brains to escape the default death in hell the last day. I am not God. I want to encourage people to use their own brains, not experts, professionals or leaders. I believe every person must use their own brains to escape certain damnation in hell. I encourage people to be critical thinkers, even of my ideas. That disorder makes us smarter and improves the world.

8. The convenience of sameness through standardization is at the loss of every individual liberty. The sameness is not fair, but forced conformity under the threat of dying if you should not conform to the will of those who unjustly control resources.

9. The equality under the UN schemers will market is their will be done, in an attempt to substantially burdening free will damning most of humanity to hell by compelled automated sameness under the pretty deceptive words: justice, equality and fairness. The market a lie as truth. Their agenda is unjust oppressive coerced control and slavery. I am not okay with the elimination of every freedom under the sameness equality they scheme. I protect people's free will to say Meg Kelly your ideas stink too. We get smarter and learn from one another when we are free to speak without government backed retaliation for exercising free speech. I believe we are in danger and need the courts help. When my case starts I may not be able to alert this Court of the harm schemed since I must focus on my case.

10. We need to protect equal protections under the law to allow the exercise of individual liberties not the compelled lawless, Satanic global slave debt system which eliminates all liberties under the threat of dying of want. The equality under the Equal Protections Clause of the 5th and 14th Amendments means freedom to choose by the dictates of our conscience, not forced sameness by the dictates of those who control resources, including technology. This new economic system violates my religious beliefs against debt because I believe it enslaves people to be damned to hell. My religious beliefs are genuine. I am so sad so many people will be damned to hell if the courts do not save them. My religious beliefs are not fake. I want the courts to save the world instead of destroying mine.

11. Attached, please find notice of the next world economic forum meeting scheduled in China June 27 through the 29th. They are scheming fast. We need the courts to be our hero to reverse the economic system that will be used to transfer to yet another economic system to overthrow our government. I hope the courts grant me time to listen to their schemes in hopes to allow me the opportunity for the courts to potentially unravel them. (Exhibit C)

12. I filed the attached Motion for a stay in the Third Circuit case Kelly v Eastern District of PA, 22-3372. (Exhibit D)

13. I also filed the attached motion for a Second caveat to her Motion for this Court to recuse Judge Scirica to move him for judicial consideration of drafting laws to prevent judges from speaking engagements on behalf of political think tanks such as the lobbyists at the Federalist Society. (Exhibit E)

14. I inadvertently failed to attach the article regarding Justice Ginsberg's inappropriate comments concerning President Trump which should have been labeled Exhibit D. (Exhibit E)

15. I see you and my esteemed schoolmate Bill Stickman spoke at the Federalist Society as recently as April 28, 2023. (Exhibit E, internal exhibit). Such engagements with lobbyists where judges lobby by telling their views or supporting views makes me uncomfortable.

16. I sat near Bill in one class in law school. I respect him. He is smart, kind, quick thinking and funny in real life. However, I do not respect or condone behavior that eliminates the impartiality of the judiciary. This includes speaking engagements before interest groups.

17. Preserving fair and impartial federal and state courts is not merely good government; it is compelled by the Fifth and Fourteenth Amendments. The ability to present one's case to an impartial tribunal is a fundamental component of due process.

18. Thus, I believe the freedoms of the judiciary, including the freedom to associate, should be construed to be limited under the Constitution in order to uphold, not chill the freedoms of the citizens they serve. US Amend I, V, XIV, XIII. Without the Constitutional restraints on judges, freedoms are eliminated by judicial conduct that chills citizens exercise of liberties. The Constitution acts as a restraint on the government, not as a license to be used both as a sword and shield against the citizens, making the judiciary and the government above the law.

19. "The administration of justice by an impartial judiciary has been basic to our conception of freedom ever since Magna Carta. It is the concern not merely of the immediate litigants. Its assurance is everyone's concern, and it is protected by the liberty guaranteed by the Fourteenth Amendment." *Bridges v. California*, 314 U.S. 252, 282 (1941).

20. “The state’s interest in ensuring that judges be and appear to be neither antagonistic, nor beholden to any interest, party, or person is entitled to the greatest respect.” *Morial v. Judiciary Comm’n*, 565 F.2d 295, 302 5th Cir. 1977).

21. I feel slimy when I hear about judges speaking at forums, even colleges. I am concerned when I read about judges teaching at colleges because it creates injustice and favoritism. Judges influence and encourage people to believe and argue points favoring what judges teach, chilling diverse viewpoints, instead of allowing litigants to persuade the courts as opposed to students and audiences to the viewpoint of the judges. It is as if judges become the advocates instead of the arbiters of justice, making courts unfair forums for one or both parties.

22. I believe judges’ opinions or dissents should speak for themselves. I think is wrong to allow judges to act as attorneys to argue their views in interest group forums, including the Federalist Society.

23. I love people. I live in Sussex County, DE where the confederate flags sway and where most people disagree with me. I do not hate them. I talk to people who think differently. So, we can learn from one another to seek truth, without compromising integrity.

24. I talked with my esteemed colleague, Karl Haller, Esquire. He shared his views with me. He liked all the judges the Federalist Society recommended, and supported former President Trump’s stance in backing the Federalist Society’s choice on judges. I actually did not know this entity may pick judges or have sway in persuading the government to choose them before talking with a more educated lawyer. I certainly did not know this before filing the Motion attached as Exhibit E.

25. I asked Karl Haller whether he thought it was appropriate judges spoke at or supported the Federalist Society, a lobbyists interest group.



26. Karl Haller said he needed to think about it.

27. I know that Bill Stickman worked with Honorable Thomas Hardiman, and that my professor is involved in helping people become judges. After all professors at law school help their students or esteemed colleagues get jobs.

28. Nevertheless, gaining judicial positions and helping your friends get liked by interest groups in order to gain a judicial seat is not fair or just. Lobbyists like the Federalist Society should not control the judiciary. Nor should the judiciary be beholden to this interest group. I think that judges are smarter thinking things out independently, than collective controlled by societal peer pressured fickle forced thoughts of interest groups' desires to be controlled by the lobbyists who entice the collective desires of the group not free to do good by protecting individuals and individual liberty from being sacrificed to serve interest groups.

29. My mom called me "mean girl" for writing this since Bill Stickman is my friend in real life, and I attached a notice Judge Colm F. Connelly and Bill spoke together at an interest group forum as recently as April 28, 2023. (Exhibit E) The Disciplinary Orders are placing a strain on my familial relationships. I love my family even if they disagree with my tightly held religious beliefs too, and my belief justice in the courts is a command by God. Citing Amos 5:15, Matthew 23:23. It is my religious belief judges who commit injustice for convenience and material gain are in danger of damnation in the fires of hell. *Isaiah* 10:1-3. I sit up straight whenever God says "Woe to you". I hear damned to hell are you should you not turn away from your sins, and clean your mind, heart, and hands (lives) of sin. I believe it is more loving to correct one another than to allow people to be misguided to be damned to hell

30. I thought Bill Stickman defriended me on Facebook when he became a judge. I was concerned he thought I was too opinionated to be publicly displayed as a judge's friend. I

was relieved when I did a Facebook search and it appeared he deactivated his Facebook. I think that choice was praiseworthy in that he recognized his speech would be more limited in order to safeguard and not chill the freedoms of those he serves. US Amend I, V, XIII.

31. I do not want to be a hypocrite. I believe the only way to guide misguided judges is 1. Cases and controversies and 2. Impeachment.

32. However Judge Scirica is in charge of federal judges. If he is acting outside of the scope of the Constitution to control a no longer free and independent but partial judiciary (partial towards self-interests in self-regulating), I thought I might as well ask him to uphold the Constitution since attorneys who require courts not violate Constitutional law are punished not praised for upholding the Constitutional rule of law.

33. Lawyers should not be disciplined for holding the courts to the Constitution in cases and controversies. Yet here I am, and my Delaware colleague Richard Abbott faces potential discipline for requiring the government adhere to the constitutional restraints that make us free and not for sale slaves to the governments' private and foreign partners.

34. I would prefer the courts humbly discern petitions by claimants concerning its own mistakes or possible misconduct rather than cowardly, unconstitutionally throwing the rule of law out the window to serve its own partial convenience and interests by punishing attorneys for exercising their First Amendment right to petition to safeguard private liberties from government mistakes or misconduct.

35. Injustice will occur if my colleague Richard Abbott, Esquire is similarly punished for exercising his First Amendment right to petition against apparent government selectively targeted disparate treatment based on firm size, connections or partiality towards interest groups.

36. The government should not be above the law, nor should lawyers be below the law's protections.

37. I seek to preserve the government by requiring the government adhere to the Supreme law of the land, the Constitution which restrains its conduct from enslaving the people for its own vanity or to private and foreign partners to preserve these United States.

Thank you for your time and consideration.

Respectfully submitted,

Dated 6/18/23

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# Exhibit 7

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF MEGHAN KELLY'S 48th AFFIDAVIT UPDATE

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

1. I write in haste because I am scared, and do not have time.
2. I apologize for the typos. I am a bad typist and am scared as I am punished for my faith in Jesus and Christ, and for standing up for the Constitutional rule of law from government violations.
3. Over the long weekend, I discovered with horror that some US Supreme Court justices politick as active members of the Federalist Society per the attached Exhibit A.
4. Please see the attached Wikipedia page which shows 1. Supreme Court Justice Samuel Alito, 2. Supreme Court Justice Clarence Thomas, 3. Supreme Court Justice Neil Gorsuch, 4. Supreme Court Justice Brett Kavanaugh, and Supreme Court Justice Amy Coney Barrett as alleged active members of the Federalist Society, a lobbyist think tank. (Exhibit A).
5. In my *motion for a Second caveat to my Motion for this Court to recuse Judge Scirica to move him for judicial consideration of drafting laws to prevent judges from speaking engagements on behalf of political think tanks such as the lobbyists at the Federalist Society*, I wrote

“3. Judges should remain impartial....

4. Individual exercise of Constitutional freedom is chilled when the only impartial government branch, the judiciary engages in partial, biased, politicking, association, support and speaking engagements.

5. The First Amendment of the US Constitution protects citizens' freedom to associate without disparate unequal favoritism by the courts towards certain associations and disparate treatments towards individuals whose ideology do not conform towards the courts favored lobbyists associations including the Federalist Society. (US Amend V, Equal Protections Component, and procedural Due Process protections of a fair not politically biased proceeding)

6. While I oppose regulating federal judges through federal rules, it appears the alleged potentially unconstitutional acts of the judiciary are left unchecked by the purview of the limits on judicial conduct by cases or controversies or impeachment.

7. Federal Judges should have more limited rights under the First Amendment in order to uphold and not chill the Constitutional freedoms of those they are charged to serve.

8. I respectfully move Judge Scirica for judicial consideration of drafting rules to prevent judges from speaking engagements on behalf of political think tanks such as the lobbyists at the Federalist Society and other political organizations or entities to protect the impartiality of the courts.

9. I believe attorneys, even attorneys labeled disabled have a duty to require the impartiality of the courts, not the mere appearance, but actual impartiality of the courts within the purview of the Constitutional limits to prevent favoritism towards the partial political interests of lobbyists like the Federalist Society. Judicial opinions and dissents should speak for themselves without encouraging favoritism towards certain viewpoints in lawsuits through judicial lobbying by speaking engagements or lobbyist groups.

10. My religious beliefs require I uphold the impartiality of the courts as a religious exercise as a party of one. (See. Deuteronomy 1:16-17, "...Hear the disputes between your brothers, and **judge fairly** between a man and his brother or a foreign resident. Show **no partiality** in judging; hear both small and great alike....")

6. I believe teaching positions and speaking engagements compromises the integrity of the judiciary.

7. I see that Judge Scirica appears to participate in both.

8. On June 20, 2023 Justice Scirica denied my motion for a recusal and my two motions for exceptions in this appeal. (Exhibit B). Judge Scirica appears to disagree with me.

9. On June 20, 2023, Judge Phipps and Judge Scirica also denied recusals in the Third Circuit matter Kelly v Eastern District Court of PA, Number 22-3372. (Exhibit C).

10. I filed the attached motion for a recusal of 4 judges in the Eastern District of PA District Court appeal, I incorporate herein without an exhibit page.

11. I believe the courts are in trouble and a way to preserve the courts is to allow correction of its members within the purview of the Constitutional limits of 1. Cases and controversies or 2. Impeachment, without waiver.

12. I thought asking the courts to please eliminate impartiality by asking Judge Scirica to require it may help.

13. Judge Scirica seems to disagree. Maybe asserting my rights in cases to allow the US Supreme Court to somehow hold the courts may only be disciplined within the purview of the constitution is the answer.

14. With that in mind, I mailed out the attached motion to the Eastern District Court of PA June 20, 2023 where I confronted the court for twice booby trapping me to get out of work at the cost of eliminating my Constitutional rights. I actually mailed out the motion prior to receipt of the orders rejecting my attached motions. The out received my motion on Wednesday June 21, 2023 by US Mail, per the confirmation of receipt attached.

15. I keep noticing new and different Constitutional issues with the Delaware disciplinary rules or application of the rules.

16. I noted in my motion to the District Court in the Eastern District of PA,

“I object to the courts eliminating me, a private party or other claimants for exercising the First Amendment right to petition to correct mistakes or misconduct by the Court and its agents. That teaches the world judges are above the Constitutional rule of law, and professionals are below the Constitutional law’s protections. This is injustice.

35. I also object when the state or federal courts look at parties unequally in favor of the state and its agents to the disadvantage of the population’s lives and liberties. This violates the Equal Protections Clause of the 5<sup>th</sup> as applied to the federal government and the 14<sup>th</sup> as applied to the state.



36. For example Del. Law. R. of Disciplinary Proc. Rule 7(d) provides grounds for discipline includes “[Failure] to furnish information to or respond to a request for information from the ODC, the PRC, the Board, or the Court, unless a protective order has been obtained from the Board or the Court.” This rule is a government compelled violation of an accused’s 5<sup>th</sup> Amendment right against self-incrimination under the threat of discipline. Cooperation with the state should not be praised as a mitigating factor of handing over the noose to one who seeks to hang you by dicta in case law. It is unjust when judges note cooperation with praise to get out of work only to discipline the one they applaud.

37. As a Christian I believe God when he teaches it is sin when judges show favor towards the state’s agents or partners by doing what government’s counsel commands, in violation of the 5<sup>th</sup> Amendment. That is not fair but creates a fixed system bent towards injustice by sacrificing individual claims and constitutional freedoms towards slavery not freedom to the government and government backed foreign and private partners. I seek to preserve the integrity of the courts in my other cases. I also seek to defend my religious belief in Jesus in Kelly v Swartz a civil rights case.

17. Attached to my motion are other pleadings where I contest Delaware Disciplinary Rules, but I think have other concerns too.

18. I am grateful for time. I am not doing so well health wise. My eye doctor said my eyes are super dried out. I am quite dehydrated. The floaters have increased which is scary. I need time to rehydrate and care for my health in order to restore my health.

19 I am grateful for time. On June 20, 2023, I went to my friend’s funeral a marine Bill Jones. His funeral was on his birth date. I am honored to call him my friend. He disagreed with me on most things. I would have it no other way. That is what a true friend does. We get smarter when we talk freely on diverse views without threat of reprisal. He made me smarter. (See, Proverbs 27:17 proclaims: “As iron sharpens iron, so one person sharpens another”). I thank God for him, and pray he feels a fuller type of love with God on the last day at the resurrection from the bones from the grave for judgment.

20. On a side note, Bill Jones leaned toward former President Trump. He also sympathized with the confederates since President Lincoln killed his own people. I think President Lincoln misbehaved for using violence, instead of words and the just rule of law.

21. Bill Jones was correct. The reason why I cited my concern President Trump may use the insurrection act as President Lincoln did in Kelly v Trump was to prevent him from murdering man for political vanity. I think judges are more powerful and kinder than might. I believe our hope to prevent the schemed overthrow is the courts with words not weapons or wealth. It is judges who grant or deny us freedom, not money nor military might. Without you we are for sale products not a free people.

Thank you for your time and consideration. I do not feel so well. So, I apologize if I am unable to provide with updates this week.

Respectfully submitted,

Dated 6/21/23

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(302) 493-6693, Not acting as a lawyer

# Exhibit 8

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF MEGHAN KELLY'S 49th AFFIDAVIT UPDATE

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

1. I write in haste because I am scared, and do not have time.
2. I apologize for the typos. I am a bad typist and am scared as I am punished for my faith in Jesus and Christ, and for standing up for the Constitutional rule of law from government violations.
3. I am a bit stressed. I am not feeling well. I am very dehydrated.
4. Stamps are also going up to 66 cents from 63 cents on June 10, 2023.
5. Years ago I proposed the post office reduce the price of stamps to make them affordable so more people would purchase them so the Post Office may make more profit in bulk.
6. Decreasing the price of US postage shipments by boxes would also reduce inflation by making it cheaper than competitor. This would help the Post Office make more money in bulk by reducing the cost of shipment of products to stores and customers decreasing prices while increasing the amount of products shipped by lowering the price of competitors.
7. The attacks against the post office based on money are frivolous as the post office may reduce costs and increase profit by selling more in bulk. The attacks are by design to eliminate the freedom of speech without government invasion of privacy in a safer form than the

internet. The increased strain based on additional postage costs exacerbates the burden upon me based on government economic persecution, preventing me from buying and selling as a lawyer but for my religious belief in Jesus as God not money and material gain as God. *Matthew 6:24*.

8. I sought to decrease the economic burden of postage and paper from being so great as to prevent my access to the courts in the Eastern District Court of PA. On June 22, 2022, I called the Eastern District Court of PA to confirm it received *Motion Respondent Meghan M Kelly's Motion for permission to use electronic filing, and waiver of paper copies before this Honorable Court, and an exemption from PACER costs to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, and compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights*, per the tracking number 9534615388663171428910 was received by the District Court at Philadelphia, PA 19106 on June 21, 2023, at 1:47 pm.

9. The District Court's staff Dan indicated it has not been processed yet. He forwarded me to Gail Olson's voice mail. No one picked up. So, I sent the attached email, attached herein in Exhibit A, wherein I indicated:

"Re: 22-45 efilng request sent to docket/ Think about it/I am slammed in multiple matters  
From: Meg Kelly (meghankellyesq@yahoo.com)  
To: paed\_clerksoffice@paed.uscourts.gov  
Cc: gail\_olson@paed.uscourts.gov;  
chambers\_of\_judge\_paul\_s\_diamond@paed.uscourts.gov; meghankellyesq@yahoo.com  
Date: Thursday, June 22, 2023 at 10:49 AM EDT  
Good morning,

Per your request in the email below, I mailed a Motion for ECF access on Tuesday June 21, 2023, which this court received Tuesday June 22, 2023, per the attached tracking and postal receipt with tracking number.

For the convenience of the Court, I also emailed Gail Olson all of the papers included in the motion. However, I had to break down one exhibit as too large. In the paper copies I provided it to you with a large binder so it is easier to scan in. I have a hard time taking off the giant staples.

This morning June 22, 2023, I called this District Court and spoke with Dan at the pro se desk. He indicated the Court has not yet docketed the motion. I alerted him to the fact this is on appeal with the Third Circuit 22-3372. So, I wanted to confirm this Court would docket the matter and not mistakenly not docket it in light of the appeal.

I understand it may take a day or two docket. Could you please confirm receipt.

Thank you,  
Meg  
Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com

On Tuesday, May 16, 2023 at 08:17:16 AM EDT, PAED\_clerksoffice  
<paed\_clerksoffice@paed.uscourts.gov> wrote:

Meghan you will need to request e-filing on your case. Just mail in your filing and ask for e-filing. Don't send anything else, just the one request for e-filing. The judge will do an order and then, you have to go on PACER like you did, but this time you need to ask as a party, not an attorney. While on this case you are a party (pro se), and I can not link up your account to your name if you select attorney.

I have to reject your request, because you neither requested ECF on your case, and there is no order, and you selected attorney instead of party.

10. The Clerk's office responded promptly on June 22, 2023, "We have received your filing and it will be filed as of yesterday when it was received." (Exhibit B).

11. I also sent Judge Diamond the attached email labeled Exhibit C along with the attached *Petitioner Meghan Kelly motion for a caveat to her Motion for this Court to recuse Judge Scirica* in hopes he may use his brilliant mind to come up with ideas to prevent the slow schemed, intentionally planned elimination of our government where I stated:

"Please see the attached. I believe judges will be replaced if the courts do not address this issue.

Judge Scirica denied this same motion in the civil rights case. Yet, this motion is still pending above.

If I could get the US Supreme Court to limit correction of judges to the purview of the constitution's limits without waiver under 1. cases and controversies and 2. impeachment, maybe the courts could prevent the planned overthrow of the government. Maybe this Court may come up with better ideas. Thank you for your kind consideration.”

13. I also wrote the PA ODC Supreme Court counsel concerning possibly drafting a Supplemental brief to the US Supreme Court relating to safeguarding the institution of the Courts by preventing non-lawyers and non-judges from lawyering on behalf of others and judging without government authority. Exhibit D.

14. I have informed this court of my belief there is an attack through societal peer pressure and Congressional pressure to control a no longer independent but partial judiciary guaranteeing injustice that will incite the automation of the courts, to eventually eliminate the rule of law if left unstopped by the lawless lusts of those who control technology. Although the dependence on enslaving the court to lawless partial lusts, what I believe is the mark of the beast business greed, still remains by judge’s misplaced concerns about productivity, costs, avoidance of costs at the exchange of selling other people’s souls and freedoms creates inherent injustice should it not be weeded out. The way money is coined and distributed by governments, banks, the Federal Reserve and the government is the problem which is leading most of the world to harm and I believe certain damnation in the fires of hell the last day by slavery to money as God and savior. *Matthew 6:24*. The way money is coined enslaves judges to eliminate freedom by barter or exchange allowing the wealth, well connected, and powerful to essentially be above the law by allowing business not freedom to be the aim of the government. Thereby, the government protects profit, productivity, positions, not people, making the people slaves to a fixed slave system, where the judges are enslaved to the mark of the beast misleading man to hell too . I



proposed a way to coin money correctly by demanding it by Congress without enslaving the people and violating my religious belief and religious exercise in Jesus Christ's words.

15. Requiring the impartiality of the courts within the purview of the Constitution by cases like my own or through impeachment may preserve the institution of the rule of law from schemed overthrow until attorney advocates may argue for justice before the courts. Just decrees must be demanded so additional partiality and injustice may be weeded out by advocates in lawsuits by removal of unjust laws and precedents.

16. I believe there is a plan to eliminate the impartial rule of law which preserves freedom of the people from private and foreign economic, physical or social compelled slavery.

17. Our current rule of law is partial and bent towards injustice by the manner how money is coined by enslaving Americans to pay back money the government grants or contracts to give to private and foreign government partners. The people are enslaved to pay back the money the government grants to entities or contracts with entities plus interest in violation of the 13 Amendment. The money is created based on slavery by delegating the Article 1 Section 8 coining power from congress to private entities the federal Reserve, the banks, the World Bank, BIS, the global money changer and the IMF. These entities make money out of debt. It is debt slavery. The 16<sup>th</sup> Amendment was created to serve slavery not freedom by taxing the people to pay back the unjust gains to the governments' private and foreign partners. The government system of coining is a system based on collusion and legalized bribery. The government praises slavery by calling it job creation wherein it arguably violates the Equal Protections Clause by giving grants and contracts based on barter or exchange, business greed, which is the mark of lawlessness that damns people to hell in the scripture sacrificing individuals and individual liberty for material gain.. See the Bible *Romans* 4:4. US Amend I, V, XIII. Those who

participate in charity and job creation collude in exploiting the needy to serve the greedy by tax breaks, marketing, for fun or other exchange, benefit, or gain in violation of Jesus's teachings leading to hell under the guise of good. In *Matthew* 6:1-4 Jesus teaches do not give alms seen. When you give, give in secret, not knowing your left hand from your right. This means do not give to get which is business not good or charity. Jesus teaches if you give to get, even connections, you will have no reward from your Father, meaning you will go to hell should you not repent of such evil abominations. I believe people sin leading to damnation in hell for fundraising, volunteering, for giving scholarships to students for tax breaks, and for organized charity. It drives out love for one another replaced with the love of money and material gain. *Matthew* 6:24. Organized charity, fundraising and charity teaches people to seek money and material worldly things as savior in place of God. They look at other people with eyes like the devil's to be destroyed in hell for even thinking people must contribute, give money or material gain, contribute to their controlled, collective, not free will to be worthy of life or to do good. They no longer look at people with clean eyes as worthy of respect and love unearned required. They look at others enslaving them to the sin of children of the devil making money and material gain savior leading to their certain damnation in the fires of hell. US Amend XIII. Little children are taught to reflect the image of the devil young. Little children will more likely be damned to hell should they die, which makes it a far more heinous tragedy when they are murdered. They are not innocent but misguided and bent towards evil unless born again, with fewer opportunities to be saved from the default of the majority, loss of eternal life. *John* 3. See *Ezekiel* Chapter 9 to confirm that even children will be destroyed in hell the past day. I am not going to go into the intricate details of how science based on scientific conditioning through behaviorist teaching theories like BF Skinner also known as temptations is used to damn many to the fires of hell.

18. Money is currently lawlessly coined based on slavery debt. Debt is against my religious beliefs. The Bible teaches owe nothing to anyone but to love them. I believe people go to hell by compelling people into debt to survive. I believe most people go to hell since that is what God through the holy spirit and Jesus teach. See *Matthew* 7:13-17 (few find life) , *Isaiah* 10:22 (only a remnant saved). Th unlawful manner money is created is a source of temptation misleading many to hell. Debt makes money God and savior teaching the people to seek money as God. I do not want people to go to hell because they look at others with lust for money and material gain, or profit or pleasure instead of with clean eyes of respect unearned required. Children of the devil look at moth and rust as the treasure. Children of God see people as the treasure not to enslave and sacrifice but to safeguard and protect freedom, free will required to escape the certain default damnation and loss of eternal life the last day. I proposed a manner to coin money lawfully in my complaint without violating Constitutional freedoms or the 13<sup>th</sup> Amendment. I am not asking the courts to draft laws. I asked the courts to keep the laws, to obey the laws by specifically obeying and upholding the Constitutional law from government violations in all three branches.

19. The way is coined tempts most humanity to go to hell by living based on making money convenience, avoidance of costs, and productivity God. I understand historically the manner money has been created has been based on slavery. It is not smart or just to continue in wrong just because evil has reigned the world throughout history. Money is not freedom. The way it is coined leads to death in hell by making money God. It is the same lawlessness feudalism, slavery, communism and other economic models create leading the majority to hell in different generations throughout history if left unrestrained by love written in the hearts of man or the just rule of law. The Courts may require Congress coin money lawfully.

20. The new economic model will eliminate the Constitutional laws safeguards to protect the people from slavery. The new economic model is schemed to be transferred to another model after 2050 at some unknown time that will eliminate governments and the rule of law that safeguards free will needed to escape the default death in hell.

21. The new system of creating money is a far more oppressive form of coining that will control a no longer free but scientifically controlled people, who are ruled over by temptations to survive or go without. There will be no private ownership of property, not even money earned. There will no free people. The system will convert to one where people will be rented out as if they are products equal to the lumber, meat, or vegetables sold. People will be looked at as mere property of those who control the resources, not people worthy of respect and free will needed to escape the default damnation in hell, freedom.

22. The video link alludes to the elimination of judges and lawyers at the World Government Summit to be replaced by technology. The aim of the transitions will be to eliminate the rule of law. There is an agenda to eliminate lawyers and judges and the rule of law. <https://www.youtube.com/watch?v=NsdmPiBc9TI>

23. We have bias and partiality in the courts by courts and advocates whose eyes and hearts are based on compromising evil for good by bartering away justice instead of discerning justice based on truth. Lawyers and parties' hands may be unclean too. We are the advocates whose duty is to shed light on truth, but our eyes are dark and evil when we care more about doing best for our own instead of what is right. Lawyers are to blame when standardized training dumbs them down tempting them not to think outside of the box of standards to uphold the freedoms of those whose exercise of rights do not conform to the standards adopted by the mob, or majority through the vote or otherwise.

24. It is my religious belief the judiciary branch is not a business. It made me so upset to see a statutes calling justice a business to be bought and bartered allowing the wealthy to do as they please, pay a fine as the cost of doing business while murdering and enslaving people for money by the manner money is coined and our poisonous foods, harmful cancer causing productions of certain products are never corrected. The disparate favoritism towards those with something to buy their will be done arguably violates the Equal Protections Clause. Judges misbehave to get out of work. There is no justice for many unless parties especially pro se parties assert their rights in order not to waive them.

25. Jesus, God the father and the holy spirit teaches me about true justice, protecting people's free will while correcting them when they harm or oppress others to protect the freedom of others too.

26. It is my religious belief that judges sin when they blindly uphold laws that violate the Constitution. They commit lawlessness that remains unaddressed possibly based on ignorance which is guilt to God, not innocence. I believe people sin for using people as an example in violation of the equal protections clause to control a no longer free people of the dictates of the government or government backed private or foreign partners, even congress people and judges.

27. Fees and penalties are unjust and serve the mark of lawlessness leading to damnation in hell when they are used to employ people to be savior by unjust gains, making money through compelled involuntary servitude in violation of the 13<sup>th</sup> Amendment savior.. I believe the government enslaves the people in this life and tempts them to the way to hell by adding fees to combat crime on traffic violations because this is the mark of lawless lusts, human sacrifice for material gain by compelled involuntary servitude by making money God. US Amend XIII.

28. In *Kelly v Trump*, I lamented the government should do its own work. If the government funds it, it should run it. No tax payer funds should pay contractors to maintain streets. The more they crumble, the more future business not freedom is supported by the government. No judge should be worried about evil men placing them under the microscope saying faster, more productivity is better, when that is a lie leading to injustice. Justice is a matter of truth, not a matter of business by barter or exchange. Money should be coined without slavery while safeguarding people's free will to buy and sell with the limits of just decrees that require safeguards to prevent made to break, repair or borrow, rent out, or replace products and subpar services. speed and amount is just more not just decrees. Just laws and justice in the courts is the answer with regards to correcting products and services that kill, harm, oppress or destroy human life to gain the world.

29. People mislead others to hell and exploitation of need to serve greed, to maintain the need to sustain the business gain by charities and businesses when they teach money and material gain to fund their business or studies is the answer. It funds inequity. Money is not the answer. The Courts are the answer. Justice in the courts is a command in the Bible. I believe judges may save not only lives but eternal lives by those who blind their eyes for a paycheck when they harm or oppress others to care for their own. I understand if the government coined money lawfully to fully fund the government without slavery and without taxes government employees' eyes would no longer be evil. There would be a reduced temptation to lawlessly seek to eat the sheep as opposed to tend and care for them. The just rule of law restrains people from human sacrifice and enslavement under the lie of the common good. Without the courts there is only injustice and reign by lusts and oppression leading to hell. It is not money that is savior of free will from temptations so great as to mislead most to hell, it is courts.

30. I understand that the stock market is a Ponzi scheme. There is no money to pay out for the baby boomers earned retirement. See the attached article labeled as Exhibit E to confirm government pensions will not be paid. The Bank of International Settlements indicates 80 Trillion in government pensions were written off for tax breaks or otherwise are not accounted for. They will not be paid which is very foreseeable and easy for lawyers and the courts to comprehend should we care to think things out.

31. The boomer's retirement would not be funded if more people made money by working. That is a lie leading to hell despite the people's ignorance or willful indifference teaching people to enslave others to care for their own, the sin against the holy spirit. More people working will not even care for their own. The more money created, the more debt due plus interest in the alchemy and the Ponzi scheme on how money is created if this court does not uphold the Constitutional freedoms of the people by cutting off the bondage to slavery and debt by requiring Congress coin lawfully. This Court's duty is not to dead men but to the people's Constitutionally protected interests.

31. With that said the new economic model is a far worse Ponzi scheme that will substantially burden mankind's free will at an extent that many will give into temptation to bend their will to the dictates of the world in place of God, damning most of humanity to hell if the courts do not stop it. When people talk of bubbles popping, they recognize there is nothing there. There are no funds despite the people earning money for retirement.

32. With regards to the Courts duty to uphold the Constitution. Their duty is not to men, judges in superior courts and their precedent. They have contracted for the government position at the bartered for exchange of upholding the preempting Constitutional laws that protect the people. Judges get it wrong sometimes. It takes great strength and humility to

improve and correct the judiciary by overturning superior courts precedent or generations of lawless application of the rule of law. That courageous act improves the world.

33. I read certain judges answers to questionnaires and believe some answers please Congressional persons to confirm their appointment, but violate the rule of law.

34. I am troubled judges do not use their own free will. They do not judge and discern truth as a matter of impartial application of the Constitutional rule of law. Instead they please the ears of those who confirm their nominations in congress by indicating their duty is to precedent, binding precedent as opposed to the preemptive Constitution application of the rule of law which safeguards precious people, not sacrificing them for the lie of gaining the world, material gain, position, profit or convenience, the type of lawlessness misleading people to hell. This lie of saving the world at the cost of sacrificing people's liberties and lives in stakeholder interests they did not consent to will be used in the new economic model. What if the Circuits know the US Supreme Court got it wrong, and they are stuck uniformly administrating injustice in violation of the Constitutional laws that protect people.

35. I am troubled by judges who state "I will fulfill my duty to observe and apply all binding Supreme Court precedent," even if it violates the Constitution. Maybe it is not the judges who err as greatly as people like me, claimants or attorneys who must act as advocates, not the courts. Maybe it is lawyers who are too blame when injustice reigns because professionals' eyes are on winning, business or money, not freedom or love for humanity.

36. This Court knows I believe organized charities and not for profits do not do good but give to get, even a paycheck, tax break, or connections. This Court knows I believe people go to hell for teaching the lie business giving out of one hand to get out of the other is charity or good or love because it drives out unconditional love from the hearts of man eliminating God



from their souls making everything and everyone a matter of barter or exchange leading to the exploitation of need to serve the mark of the beast business greed not good by freedom and unearned required respect for those the government serves and protects.

37. I previously indicated I believe judicial speaking engagements and judicial teaching gigs corrupt the courts by creating judge attorney advocates who advocate the beliefs they share and teach. These partial productions also tempt judges to support those who support their ideology including schools, associations and the Federalist Society.

38. Attached, please find an example where a party appeared to be prejudiced by a partial judge who spoke at a conference supporting the ideology of those who supported him as opposed to the claimant. (Exhibit G).

39. I oppose partiality by the Courts not only to preserve the right to a fair trial and procedural due process for Americans, but also because favoritism, partiality, and bias is against my religious belief in Jesus Christ. See the attached letter to the US Supreme Court where I outlined my religious beliefs.

40. I am a Christian, and I find guidance in the Bible. Please note, even if paper Bibles ceased to exist, my God still is. My belief in God the Father, the son and the holy spirit is not diminished should Bible's no longer be printed to allegedly save the trees. Nevertheless, God's word is revealed by those who are inspired by the Holy spirit in the Bible and in life now.

41. 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 the government is supposed to serve, all the American people.

42. God calls us to love those beyond our own even our opponents. I believe people sin against God when they merely serve their own children and families, and those who serve or affect them, instead of all the people they are appointed to serve in their position of life.. Jesus said even evil people care for their children. (See, *Matthew* 7:9-12, "Which of you, if your son asks for bread, will give him a stone? Or if he asks for a fish, will give him a snake? If you, then, though you are evil, know how to give good gifts to your children..."). Jesus said even those without God love those who love them, and greet those who great them. (See, *Luke* 6:32-35, "if you love those who love you, what credit is that to you? Even sinners love those who love them. And if you do good to those who are good to you, what credit is that to you? Even sinners do that. But love your enemies, do good to them, and lend to them, expecting nothing in return. Then your reward will be great, and you will be sons of the Most High; for He is kind to the ungrateful and wicked"); (See also, *Romans* 12:14); (See *Matthew* 5:44-45, "But I tell you, love your enemies and pray for those who persecute you, that you may be sons of your Father in heaven."); (*Matthew* 5:46-47, "If you love those who love you, what reward will you get?... And if you greet only your people, what are you doing more than others? Do not even the pagans do that?").

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

44. Leaders who serve themselves and those who serve them are not good leaders. They are servers of self not public servants, even in Congress and Presidents unrestrained by love in their hearts or court correction to protect Equal Protections under the law. US Amend V,

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

45. In *Ezekiel* Chapter 34:1-10, God scolds leaders, shepherd who take advantage of the sheep to serve themselves instead of caring for them. "Woe to you shepherd of Israel who only take care of yourselves! Should not shepherds take care of the flock? You eat the curds, clothe yourself with wool and slaughter the choice animals, but you do not take care of the flock...." Id. *Leviticus* 19:15 "'You must not pervert justice; you must not show partiality to the poor or favoritism to the rich; you are to judge your neighbor fairly"); (see, *Exodus* 23:6, "You shall not deny justice to the poor in their lawsuits."); (see, *Deuteronomy* 16:19, "Do not deny justice or show partiality"); (also see, *Deuteronomy* 1:17, "Show no partiality in judging; hear both small and great alike. Do not be intimidated by anyone, for judgment belongs to God. And bring to me any case too difficult for you, and I will hear it.").

46. I even shared my view on what using the name of God in vain means when I proposed a suggestion to Senator Tom Carper of Delaware. (See, Exhibit 9 at DI 3). I believe it means using the name of God, or religion or scripture for man's purpose instead of a true religious purpose, God's purpose.

47. I believe it would be wrong for Presidential candidates and congressional candidates to collect donations or signatures from lobbyists and people as it would create the appearance of influence and favoritism in violation of the bible's teachings as we are called to serve everyone's best interests, not merely those who support us, or pay us with lobbyists money. That is a sin against God. (See, *James* 2:, "do not show favoritism."); (*James* 2:9, "But if you show favoritism, you sin and are convicted by the law as transgressors."); (*Deuteronomy* 16:19,

"Do not deny justice or show partiality. Do not accept any bribes, for a bribe blinds the eyes of the wise and twists the words of the righteous."); (*Proverbs* 18:5, "Showing partiality to the wicked is not good, nor is depriving the innocent of justice."); (*Proverbs* 24:23, "These also are sayings of the wise: To show partiality in judgment is not good."); (*Malachi* 2:9, "So I in turn have made you despised and humiliated before all the people, because you have not kept My ways, but have shown partiality in matters of the law."); (*Job* 34:19, "who shows no partiality to princes and does not favor the rich over the poor, for they are all the work of his hands?"); (*Job* 13:10, "Surely He would rebuke you if you secretly showed partiality.").

48. Similarly, I think it is wrong for judges to accept speaking engagement and teaching positions, by making them partial to those who support the judges' ideology they teach. There is a temptation to be partial to the judge's own interests.

49. My goal is to safeguard the rule of law from the schemed demise. Jesus teaches no one knows when the end will be. I do not. I do know the devil distorts God's word to mislead people to harm and damnation in hell throughout history. I also believe the courts can save lives and eternal lives. Judges are special even if they mess up and make mistakes, and humbly seek to correct them, after all they are not God.

50. Jesus Christ taught "justice, mercy and faithfulness are greater laws than laws dealing with material gain because Judges can prevent harm here and damnation in hell if they only choose to care to know in order to love those they serve, even protecting those they are correcting. Matthew 23:23.

51. Impartial justice is a command in the bible because it is God's will to guide the misguided to save eternal lives. Amos 5:15.

52. I became a lawyer to do God's will. The devil is called the lawless one in scripture. How do you combat the devil? One way is through the just rule of law to guide the misguided. Throughout the Bible ignorance is guilt, misunderstanding, confusion, believing a lie as truth misleads people to harm others to be damned to hell for their confusion.

53. The Courts contribute to the fires of hell when they defer to professional standards and business practices that kill, steal and destroy human life and liberty for material gain. This is the same as human sacrifice by throwing people into the volcanoes for better crops.

\ 54. We need the courts to judge the laws, judge the other two branches, judge themselves and their peers in cases and controversies, not disciplinary or regulatory proceedings. If the courts do not judge judges in cases and controversies others may seek to regulate the courts because the courts make judges above the law which plays into the real agenda to eliminate the rule of law down the line.

55. The Third Circuit on June 22, 2023 denied my motion for reargument of my appeal per the attached (Exhibit G)

56. I am stressed. Per the attached emails, Walmart prevented me from buying their cheaper ink. (Exhibit H).

57. I also am mourning the loss of loved ones. I lost 5 to 6 people on my street. Other streets our development lost more. I attended the funeral of Bill Jones last week. I have lost 1. 2. Tyson, Don Stevenson, 3. Richard York, 4. Heather Kaufman's live in grandmom, 5. Greg Tursline, and Bill Jones, all on one street since 2020. I imagine others have suffered similar losses.

58. I do not want to die. In the Bible death is labeled an enemy, but I do not feel well at all now. I am dangerously dehydrated and need time to recuperate.

59. I think I should try to draft a motion for a reargument on the denial for a recusal of Judge Scirica. I am just too worn out to work on it the next few days. I am not sure whether I should draft a motion for reargument on the denial of the recusal for Judge Phipps and Judge Scirica in the Eastern District Court of PA appeal, 22-3372.

60. I asked opposing counsel her position. She has not responded.

61. I am in awe to realize Danny Bickel at the US Supreme Court took time to talk with me. I did not know he was the motions clerk for the entire US Supreme Court for the entire country, not merely for assigned circuits. I asked him previously whether I could appeal the denial of the recusals prior to the Court's final decision. He said no. I have to do it at once.

62. I think he may have been mistaken. The answer may be a legal conclusion only a judge could render. The US Supreme Court previously denied a petition for cert relating to recusing a judge separately in the attached *Martin v Knox*, 112 S.Ct. 620 that is distinguished from my case in that the underlying recusal motion were allegedly without merit. This may arguably not create precedent that recusal motions may not be separately appealable given the split in the Circuits. The dissent indicated,

“The petition is not frivolous because it raises a question on which the Courts of Appeals are in conflict. Compare *In re Beard*, 811 F.2d 818, 827 (CA4 1987) (district judge's failure to disqualify himself can be reviewed by a petition for writ of mandamus); *Union Carbide Corp. v. U.S. Cutting Service, Inc.*, 782 F.2d 710, 713 (CA7 1986) (same), with *Pittsburgh v. Simmons*, 729 F.2d 953, 954 (CA3 1984) (judge's failure to recuse himself is reviewable only after final judgment); *Cleveland v. Krupansky*, 619 F.2d 576, 578 (CA6) (same), cert. denied, 449 U.S. 834, 101 S.Ct. 106, 66 L.Ed.2d 40 (1980). Accordingly, it would be inappropriate to invoke Rule 39.8 and deny Martin's motion for leave to proceed in forma pauperis. I nevertheless agree that it is proper to deny the certiorari petition because it appears that the underlying recusal motion has no merit.”

63. I am so disappointed in myself for not blindly deferring to what others say, but seeking to look up things myself. There appears to be a split in the circuit.

64. You know that I seek to separate government from religion to safeguard our freedoms to worship or not, despite the fact I outline why my religious beliefs require I seek to preserve the actual impartiality, not the mere appearance of the courts.

65. I am very dehydrated and I need time to recuperate.

Thank you for your time and consideration.

Respectfully submitted,

Dated 6/26/23

Meghan M. Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)  
(302) 493-6693, Not acting as a lawyer  
Defending my First Amendment private right to  
believe in Jesus Christ as God, not money or  
mammon as God

# Exhibit 9



UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF MEGHAN KELLY'S 50th AFFIDAVIT UPDATE

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

1. The summer reading before my First year in law school in 2001 included case regarding thermal radiation searches of homes in 1998 for pot plants. The US Supreme Court held the search for plants and humans by thermal searches was an unconstitutional search and seizure. *Killo v United States*, 533 U.S. 27 (2001).

2. Upon information and belief that technology is currently used by the government's private and foreign partners to conduct searches of people through chips and wifi tracking now, through appliances, printers, HVAC, and other wifi connections.

3. Please see the attached articles by MIT dated 2015, as Exhibit B describing the technology. Anything smart or electronically monitored is dangerous in that it eliminates the right privacy and allows for business oppression. Marketers may seek to get as much as they can for as little by controlling what prices people see for goods they use. This technology tracks heat radiation to detect people's bodies through walls. This can show when they shower, go to the bathroom, open the refrigerator or brush their teeth and other activities. This allows entities to sell products based on the tracked habits of humans.

4. I hate the chips act because it allows the tracking of every chipped item.

5. The overturning of *Roe v. Wade* removed the federal right to privacy, beyond the 4<sup>th</sup> Amendment right against evidence used in unlawful searches and seizures in criminal proceedings. We arguably have the state right for intrusion into the seclusion in DE, but federal agencies gave private companies the right to piggy back and use private people's wifi data. See, *Roe v. Wade*, 410 U.S. 113, 129 (1973) ("This right in the concept of personal "liberty" embodied in the Fourteenth Amendment's Due Process Clause; or in personal, marital, familial, and sexual privacy said to be protected by the Bill of Rights or its penumbras")

6. I oppose abortion because I do not believe the babies go to heaven which breaks my heart. Jesus Christ teaches we must not merely be born; we must be born again. See *John 3*. These children were not only robbed of the opportunity to have life now, but they will not have eternal life either which makes me so sad since I look at people as the treasure and money and material things as moth and rust.

7. Yet, I am cognizant that the removal of the federal right to privacy by overturning *Roe v. Wade* will allow the overthrow of the government through private and foreign partners

8. If the courts place checks on the other two branches, and the private and foreign partners, we may be able to reverse or prevent the schemed overthrow.

9. In my last affidavit I noted I was upset applicants for judicial positions pledged their allegiance to mere men and their precedent instead of the Constitutional law as they sought endorsements. Yet, the courts should not be blamed for injustice. The blame should be pointed to lawyers, even lawyers placed on disabled like me. I am sorry for my misplaced concern. The finger must be pointed at myself and other attorneys. We misbehave when we are not courageous enough to persuade the courts of their error to uphold justice.

10. The attached excerpt of a recent Supreme Court decision, *Mallory v. Norfolk Southern R. Co.*, dated June 27, 2023, labeled Exhibit B held, ““If a precedent of this Court has direct application in a case,” as Pennsylvania Fire does here, a lower court “should follow the case which directly controls, leaving to this Court the prerogative of overruling its own decisions.” Rodriguez de *Quijas v. Shearson/American Express, Inc.*, 490 U. S. 477, 484. This is true even if the lower court thinks the precedent is in tension with “some other line of decisions.” Ibid. Pp. 10–12.

11. With regards to my last affidavit where I lamented on judicial nominees averring to obedience to superior courts even if it violates the Constitution, it appears it is lawyers, even lawyers placed on disability inactive are to blame for the injustices in the world, blinded by a pay check and dumbed down standardization, not the judges.

12. Lawyers have to be courageous by doing what is right, not what is self-serving or materially beneficial for their colleagues at the cost of sacrificing the rights of the weak and the different.

13. The Courts are in trouble. I was happy it placed a check upon states on June 27 in *Moore v Harper* by restraining state acts to the limits of preempting federal law. I believe that may help preserve the courts and the government from schemed planned attacks by showing government conduct must not violate Constitutional law making the government above the law..

14. I also believe the courts may preserve the judiciary by limiting correction of the judiciary within the purview of the Constitution’s authority without waiver by 1. cases and controversies like my own and impeachment.

15. Justice is not a popularity contest left to public fickle opinions.

16. The attacks against the courts are unnatural and planned to aide in a government overthrow. There are a number of ways to prevent the overthrow. One way I mentioned was to coin lawfully as I proposed in my Complaint. So the Central banks may no longer control a no longer free government or free people by debts and carbon credits to bend the will of the people to their dictates under the penalty of not being able to buy and sell.

17. When I ran for office I proposed laws that would prevent pollution without use of economic force to control and oppress the people to bend their will to the government or government backed partners. That is lawlessness. I am not anti-environment. I am anti-slavery and oppression which eliminates every constitutional liberty. I get smarter when people disagree with me and one another. That is how we learn from one another instead of the dumbed down standardization which creates subpar goods and services for material gain and convenience of those who sell a product.

18. The US Supreme Court released a unanimous opinion overturning the Third Circuit's opinion in *Gerald E. Groff v. Louis DeJoy, Postmaster General*, No. 22-174. I am grateful as a different ruling would have caused unrest by Adventist to feel unprotected to freely exercise religious belief to worship on the day they believe is the Sabbath. Some members of this group believe people go to hell for worshipping God on Sunday. They call it the Mark of the beast. I disagree, but protect their free will to belief by the dictates of their conscience. Members of this religion think my religious belief and association is naughty. So, it is especially important to protect this group as there is outrage against the establishment of government religion by government partnerships with the Catholic Church, my church. I sought to dissolve the partnerships in *Kelly v Trump* to protect the government, the church and the people's freedom to worship or not according to the dictates of their conscience not the dictates of the dollars or

government backing of certain religions, while ignoring others based on barter or exchange not freedom.

20. On June 29, 2023, the US Supreme Court in *Groff v. Dejoy*, “Held: Title VII requires an employer that denies a religious accommodation to show that the burden of granting an accommodation would result in substantial increased costs in relation to the conduct of its particular business.”

21. The Court explained “aced with an accommodation request like *Groff*’s, an employer must do more than conclude that forcing other employees to work overtime would constitute an undue hardship. *Id.*

22. On June 29, 2023, the US Supreme Court also appeared to overturn affirmative action in *Students for Fair Admissions, Inc. v. President and Fellows of Harvard College*.

23. Money and material advantage is not justice as a matter of truth. I hate when the court looks at history instead of discerning facts before them in light of truth, not past truths. Affirmative action may be over. It is sin to teach throwing money at things is justice. I believe it teaches the way to hell by making money God in contraventions to Jesus’s teachings in *Matthew* 6:24. I believe it is not okay to disparately treat outsiders to care for your own regardless of race, religion or place of origin even if affirmative action is over. The Equal protections clause of the 14th and 5th remains, though businesses and charities often treat certain groups better than others to sell products based on popularity of a groups’ stance. If businesses are selectively backed by government through words, grants, contracts or other support they arguably perform a government function and should not be allowed to mistreat or not serve customers based on orientation or belief. The Supreme Court cases are in conflict with my beliefs.

24. I drafted an article of impeachment for congress to impeach President Trump based on his violation of criminal law 18 USC 227 by his incitement of economic persecution of NFL players who exercised their First Amendment right to peacefully protest against certain disparate treatment against blacks in the criminal judicial system. I sought to protect the oppressed by seeking justice not money.

25. This case, *Students for Fair Admissions, Inc. v. President and Fellows of Harvard College*, must not needlessly cause unrest by lobbyists who seek money not justice. The Courts must not be partial to people pleasing, popularity or fickle fads. It is up to lawyers to persuade the courts when they believe the court is wrong, not the mob reign of everchanging lawless lusts. Sometimes lawyers get it wrong too. That does not mean they should be punished for disagreeing with the court.

26. I do not feel well at all. I hope this court does not think less of me because I require time to care for my life, health and loved ones, and may not be able to write for awhile despite my concerns on Web3, the WEF meeting June 27-29 and other agendas that will be used to overthrow the government down the line, should the courts not stop them.

27. I do not approve of judges politicking, but whether judges conquer is up to the courts. Attached, please find a picture of my schoolmate I esteem Judge Bill Stickman and I upon graduation. Bill and Judge Connelly spoke at the Federalist Society on or about April 28, 2023. I see the US Supreme Court justices do the same too. It is not up to regulators to correct the court but lawyers in cases and controversies where their loyalty is questioned like the Board questioned my loyalty to the profession, whereas my loyalty is to the impartial rule of law.

28. Attached also find some pictures of my friend Sarah Cha Cha, now Carter and I at Chamber events where the government colluded with private partners to plan a fixed not free

economy. Senator carper disagreed with my health care proposals to protect sick and old people which broke my heart. Notice his grimace when pictured with me as opposed to Sarah. When I ran for office, he also grimaced in the attached picture. Despite my failure to persuade Senator Carper, loss of an election and dismissal of Kelly v Trump, I do not regret doing what I believe was right. I would regret doing nothing. It is possible I may have moved someone's heart who may move the mountains I failed to shake.

29. On an aside, I took time away from the practice of law because I thought I was going to get married to the most wonderful man on the planet attached here. That did not work out. Yet, he will remain the love of my life the rest of my life. So, I do not regret putting God, people I love, and justice not business or money first, even when I fail or fall.

Thank you for your time and consideration.

Respectfully submitted,

Dated 6/29/23

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[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)  
(302) 493-6693, Not acting as a lawyer  
Defending my First Amendment private right to  
believe in Jesus Christ as God, not money or  
mammon as God

# Exhibit 10



UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF MEGHAN KELLY'S 51st AFFIDAVIT UPDATE

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

1. The Third Circuit rendered two judgements against me in the Eastern District of PA case, per the attached orders on Friday June 30, 2023. I must draft motions for reaguments on all of the denials. I am just so tired and distraught. The Third Circuit also filed an order in this case on Friday, June 30, 2023, per the notice this Court received at DI-160.

2. I feel like a rug has been pulled under my feet and a dagger stabbed into my heart.

3. I have to draft motions for reagument on a bunch of denied motions and appeal in the Third Circuit regarding to the Eastern District of Pa, but I do not have time and I do not feel well.

4. I am pretty upset.

5. I am in trouble for my religious beliefs in Jesus as God, not money and material gain as God. I am in trouble for believing people blinded by seeking money and material gain to care for their own to the extent they do not see clearly on how their training, work, job or conduct harm or oppress others sin. I believe people go to hell the last day for making money and material things God, by making business God. *Matthew 6:24*. I do not want people to go to hell. I believe Judges may save people blinded by desire for money to provide for themselves to see clearly by court correction to prevent their certain damnation in hell by serving the mark of

children of the devil, business greed unrestrained with God's law of love written on their hearts or the just rule of law. *Jeremiah* 31. I believe judges have the capacity of saving eternal lives.

6. I believe judges guarantee injustice when they blindly defer to professionals, workers, businessmen, philanthropists, experts and their mere studies, science, technology and products.

7. By such deference, judges make professional standards, business practices, services and products above judicial correction when they oppress, harm, kill, steal or destroy human life and health to sustain positions, profit or power. I believe Judges essentially serve lawlessness leading to hell by allowing human sacrifice of liberty or life for convenience, productivity and material gain. I think it is lawlessness in the eyes of God not to use your brain and think things out by blindly deferring to the corrupted science and professionals without discerning the innate conflict of interest.

8. I desire judges to judge not professionals. The blind, convenient deferment to science, mere studies, and professionals allows their professional misconduct to be above the law's court correction to prevent their certain condemnation in hell. It makes men, mere professionals, God, misleading people to harm and damnation in hell for idolatry. The fact professionals and the people they mislead and deceive did not know they caused harm by doing what they were trained to do does not remove the harm towards others. I believe people go to hell for not knowing they commit oppression, or human sacrifice of life and liberty for material gain by doing what they are trained to do. I believe people go to hell for not caring to know, for misunderstanding, for their confusion, for their unconcern, or belief in a lie should they not unhardened their heads and unhardened their hearts. I do not want people to go to hell.

9. I believe judges are special because they may not only prevent harm and save victims of other people's sins of business greed by selling products that kill them, they may save the blind and dumb wrongdoers soul from losing eternal life on judgment day.

10. I desire the judges be free from the temptation and pressure of productivity and profit to commit injustice for convenience by requiring Congress to fully fund their pay without taxation by coining correctly without slave debt in violation of the 13<sup>th</sup> Amendment and my First Amendment Freedom of religious belief, as applied. The private entities and the banks should no longer govern by slavery. Congress should take back its coining power to coin to eliminate slavery to protect people's freedom as opposed to enslaving them to enrich those the government disparately favors in violation of the Equal Protections Clause of the 5<sup>th</sup> and 14<sup>th</sup> Amendment by government grants and contracts in a fixed not free economy where the unlevel playing field is based on government business not government service. Business serves greed not humanity. The government cannot govern and guide misguided businesses who kill, steal and destroy when the government colludes with the wrongdoers by government backing through words or money.

11. People I have spoken with say the government is too corrupt and will not coin freely to fund the government without slavery. The courts may eliminate corruption. Judges have free will and may do it in another case to prevent slavery on a greater level.

12. The two new schemed economic models violate my religious belief on a greater level by enslaving people to debt on every transaction until people and the governments will no longer own any material thing and will be owned by those who control the resources without restraint in the form of law. The Central banks are rendered above the law to be the letter of the law above court correction under the carbon debt/credit plan. Upon information and belief after resources are transitioned to entities eliminating private property a second economic model will

eliminate governments. There are literally books that allude to such schemes like the Club of Rome's 2052. I am not pulling this out of thin air. I believe the courts are in trouble, meaning we are in trouble. As the economic transition worsens the court must know there is a way out to reverse or prevent the planned dissolution of these United States.

13. If advocate attorneys may require the other two branches obey the Constitution, judges can make our country free, not for sale slave people to private and foreign partners. Judges would no longer be tempted to create injustice by the mark of the beast, desire for material gain, convenience, productivity by sacrificing justice as a matter of truth if Congress coined lawfully. Attorneys are supposed to advocate against slavery by removal of temptations not allow governments to rule like the lawless one Satan by temptations of reward or threat of harm, aka scientific conditioning to entice the people to bend to the governments will substantially burdening freedom by their disparate backing of business and charities in a fixed, unlevel, not free market place in violation of Equal protections and slavery.

14. I believe the government commits lawlessness before God leading to the participants certain damnation in hell when it uses money based on slavery by how it is coined to violate the equal protections clause by granting not for profits, businesses, churches and charities money to perform government business by grants or contracts. Giving to get is business. The government destroys freedom by enslaving people to exploit the needy to serve the greedy. I believe people sin when they create jobs under the lie job creation in a slave, fixed market is good. I believe God teaches those who receive unjust gains by barter with the government sin leading to their certain damnation in hell should they not repent. Should the courts separate business from freedom, the government collusion with the private sector would cease. Then, the government may uphold the Constitutional freedoms of the people from slavery of many to serve

the few who barter for power, profit or positions with the colluding government through legalized bribery under the guise of bartering for government contracts. I think it is wrong even though we are trained to praise evil as good. Judges can change the world by righting wrongs which have occurred for over 100 years since the Federal Reserve was created in 1913. Just because the templars and other countries coined through debt slavery even in Roman times does mean we should continue. Babylon allegedly may be the first nation to enslave people to debt by the manner they coined money which we mimic today. The debt slavery manner money is created oppresses people in this life to enrich those who receive unjust gains leading to damnation in hell in the next by making money savior to pay off those people owe not freely but artificially.

15. I believe people are misled to harm and damnation in hell by the salve sustem of coining. The two new economic models of money creation increase temptations leading to harm and hell. I am in tears. I believe the courts may save their lives and eternal lives. This does not relate to my law suit, but I am using this opportunity to plant a seed in your heart in hopes the courts may be our hero at another time, preferably with some else bringing a suit.

16. I did not know how bad the world was until I ran for office. In my last affidavit I showed pictures where I attended functions only business people and government agents attend. The common people had no voice. They planned a fixed not free economy by money and forced business by government legalized bribery by giving entities money to do what they were told. I love dressing up and wearing sparkles like people did in the batman movies, but I learned it was dirty and sinful to attend functions where I learned only a select few rule over the many by government backed private economic pressure.

17. I learned allowing lobbyists and organizations to pressure the government through money or support in elections eliminates individual freedom for business by backing or other barter or exchange. The government serves greed not the people it exploits to serve the economy which serves some, not all selectively in violation of the Equal Protections Clause.

18. It was weird when I ran for office I reached out to groups asking how they proposed to fix the problems they market like trash or pollution. No one had solutions. Those I contacted just wanted money. I did not ask for support, but for their answers. They had none. I believe people go to hell for teaching money is the answer by fundraising, charity, work or otherwise, should they not repent.

19. I believe the answer is drafting just decrees or seeking justice in the courts. Judges are part of the solution that eliminates the problem.

20. I am astonished at congressional proposals, and lobbyists for lamenting about judges buying and bartering in the market and for personal relationships when the other two branches' hands are unclean. The other two branches seek donations which I see as legalized bribery or favor or benefit in exchange for grants or contracts. They misbehave and must "pull out of the beam out of their own eye before pulling a splinter out of the court's eye." Citing Jesus. Every person has an interest in every case before the US Supreme Court since their opinions create case law that governs and guides all of our activity to limits to protect freedom.

21. I have religious beliefs against organized charity, fundraising or lobbying, which may create unique standing should the courts ever need to eliminate the undue influence and corruption of money and material gain by bought backing within the other two branches of government.

22. My religious beliefs are genuine.

23. I sent Judge Diamond proof the Delaware Supreme Court sealed material evidence in my favor to fix the proceeding against me, attached hereto I also deferred to the the Eastern District of PA District Court's request request and sent the attached Motion for ECF access, excluding exhibits.

24. As I have been reviewing the docket, I noticed undisputable proof the DE Supreme Court enticed the state attacks against me in Kelly by Trump and the Disciplinary proceeding. Attached, please find the DE Supreme Court letter where the Court copied the Disciplinary Board during Kelly v Trump, prior to this law suit. I filed this letter with this court with notice I contested certain Disciplinary rules prior to this Court's Order issued that same day. See DI 58, DI 59.

25. I am so upset, but I thank the court's staff. I need to wipe m tears and work on overturning the Third Circuit orders.

Thank you for your time and consideration.

Respectfully submitted,

Dated 7/2/23

Meghan M. Kelly  
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(302) 493-6693, Not acting as a lawyer  
Defending my First Amendment private right to  
believe in Jesus Christ as God, not money or  
mammon as God

# Exhibit 11



UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF MEGHAN KELLY'S 52nd AFFIDAVIT UPDATE

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

1. I told my parents about the bad news today, the orders I must appeal and potentially 6 new law suits with a certain one by the US Supreme Court should I not overturn it.

2. Instead of comforting me, they freaked out and threatened to disown me by cutting off the phone making me move out.

3. I love my family but I cannot turn to them when bad things happen without facing the wrath of my parents, even rat babies in law school or school papers. Hence, I do not have proof readers, without wrath.

4. I am so distraught and was thinking about retaining an attorney should I overturn the Third Circuit's order in this case if he would take the case without costs.

5. Jesus teaches us not to have an advocate when we are brought to court. I am taking the Defendants to court. So, this may be different. There is only one attorney I would choose.

6. I certainly would have fewer means to advocate on behalf of myself if my parents cut off my phone again as they did before.

7. I just cannot tell them bad news. I am sorry I upset them because I love them. They also disagree with my religious beliefs which is difficult.

8. Attached find an old picture of my dad, baby brother, and one of my brother's best friends, an FBI agent Mike Trilio, spelling unknown ("Mike").

9. Back in 2007-2008, I learned through my brother, who if I recall correctly, learned through Mike that everything on our computer was accessible to hacks even if we unplugged our lap tops. Ever since 2007-2208 I took out the battery in every lap top before they prevented us from taking out the battery by sealing them in.

10. There's been evidence of a scheme to eliminate the dollar to allow a digital feudal system under the lie of saving the environment only to enslave the people while profiting wrong doers who make more money and sustain their positions so long as the pollution problem persists.

11. The new system allows the Central banks to reign unrestrained by the government, even controlling the governments. The new system allows the banks to increase debt, to increase recoupment of property on secured loans to allow for slow control of resources. Then, the next economic model will be forced upon us which will eliminate governments after 2050 if the courts do not save us.

12. I may not be able to think of a way to include how the court may prevent the dissolution of the US, but I am trying. My hope of a hero is the courts, even if it is in a different case by a different party.

13. The digital back doors to our computers and devices allow for block chain, crypto currency and tokens to implement the new economic model.

14. The Patriot's Act required the back doors to our digital devices to be open, which is needed in order for digital currency to work.

15. The Patriot's Act may not be in effect, but the purpose of it to allow for this digital economic system remains.

16. If Congress drafted laws to coin correctly and to close the back doors to our devices because the Courts rendered tracking of everything we buy and sell as an invasion of right against government backed searches and seizures under the 4<sup>th</sup> or under the penumbra of the 5<sup>th</sup> Amendment procedural Due process right of privacy Roe v Wade declared, maybe this court may stop a slow digital overthrow.

Thank you for your time and consideration.

Respectfully submitted,

Dated 7/2/23

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(302) 493-6693, Not acting as a lawyer  
Defending my First Amendment private right to  
believe in Jesus Christ as God, not money or  
mammon as God

# Exhibit 12

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

Plaintiff Meghan M Kelly's **Second** Motion to stay the Proceeding until the conclusion of Respondent's originating disciplinary proceeding until a final non-appealable determination is made or the time of appeal has lapsed. Plaintiff further moves the Court, for good cause for permission to file an Amended complaint 30 days after the stay is lifted

I, Plaintiff Meghan M. Kelly, move this Court to stay this proceeding until conclusion of the Delaware disciplinary proceeding by a final non-appealable determination or the time of appeal has lapsed. Plaintiff further moves the Court, for good cause, for permission to file an Amended Complaint 30 days after the stay is lifted. Simultaneously herewith, I am filing a motion under FRCP R 60(b)(1)(2)(3)(4)(6) to alter and amend the orders, dated November 2, 2022, December 22, 2021, and April 26, 2022, I incorporate herein by reference in its entirety.

**Background**

1. I agree not to practice law on behalf of another, without this Court's authorization.
2. On 7/13/2022, I filed a motion to stay the proceeding pending a determination in the state proceeding including appeals to the US Supreme Court, or the time for appeal lapses, I incorporate herein by reference. (DI 80). Every docket item ("DI") and the exhibits thereto in other DIs I incorporated herein by reference by every DI reference.
3. On 7/17/2022, I filed *Plaintiff Meghan Kelly's Motion to Withdraw Plaintiff's Motion to amend the complaint pursuant to FRCP 15(a)(1) and FRCP 15(a)(2) to include*

*additional parties, eliminate a party, include additional facts and include additional requests for relief, dated January 24, 2022, Docket Item 43 and intent to request leave be granted to amend the complaint, as a matter of right, after the state proceeding is complete, including appeals to the US Supreme Court, or the time of appeal has expired, and to serve such Amended Complaint, with an amended praecipe, with corrections, as opposed to the original complaint through the US Marshall, I incorporate herein by reference in its entirety this Motion, especially the legal citations in the footnotes, and arguments to amend the complaint therein. (DI 81)*

4. On various dates, I filed Motions to Amend the Complaint, and related documents, including a Motion to withdraw my initial motion to amend, while maintaining such amendments therein, in order to include additional amendments, and Rolling Motions, Under FRCP Rule 15. I incorporate herein by reference these documents, and the documents referred to in the DI numbers. (DI 43, 55, 56, 58, 69-75, 77, 79, 80, 81, 82, 83, 85).

5. I seek to *inter alias* amend the complaint in the civil rights case, *Kelly v Swartz* to *inter alias* void the Delaware Disciplinary proceeding and the Delaware decision in *Kelly v Trump*. The outcome for or against my case in both proceedings will affect the outcome on any decision before this Honorable Court because the litigation relates to the same conduct.

6. I also seek to amend the Complaint to include additional causes of actions and facts that have arisen as a result of the August 10, 2022 State Disciplinary Order placing my active license to practice law on disabled/inactive.

7. On September 7, 2022, the Delaware Supreme Court denied my motion for reargument. I intend to appeal this decision with the US Supreme Court.

8. I face a total of 8 cases, this civil rights case, the 6 potential reciprocal cases or appeals, and the appeal of the original discipline case. I am seeking to stay disciplinary cases.

9. Fighting all 8 cases at once creates a substantial burden upon my access to this court and the US Supreme Court on appeal, due to time constraints, my poverty and religious beliefs against debt. (Bible, *Romans* 13:8)

10. PA Disciplinary counsel opposed my stay in its reciprocal discipline case.  
(Exhibits A, B, B-1, and Internal Exhibit F and D-1 of B-1, incorporated herein by reference)

11. I require a stay from this Court as I fight off the reciprocal proceedings, and seek a meaningful opportunity to appeal the Delaware disciplinary order with the US Supreme Court.

12. A determination on appeal by the US Supreme Court of the original disciplinary matter may lead courts to vacate pending disciplinary proceedings.

13. A stay is required to protect my meaningful access to the courts.

14. The additional law suits have increased costs, caused me to panic, lose sleep, and gain baby white hairs. If I expend all my resources in terms of time, paper and other costs, by defending all cases simultaneously only to run out of resources, I would be prevented from defending my exercise of fundamental rights in any case to its conclusion.

15. A lawyer's right, my right to pursue my profession constitutes a property protected by the due process clause of the Fourteenth Amendment, and of which I cannot be deprived for any whimsical, capricious or unreasonable cause, including the state's disagreement with my religious-political beliefs.

16. I must be afforded access to the courts to defend my license to practice law from being placed on inactive disabled but for my faith in Jesus Christ, and exercise of fundamental rights.

17. I am utterly poor. A stay is required to prevent a substantial burden and obstacle to my access to the Courts, and compelled violation of my religious belief against debt, in contravention to my First Amendment right to access to the Courts applicable to the Federal Courts via the Equal Protection component of the 5th Amendment, for me, a member of class of one due to religious beliefs against incurring debt combined and due to utter poverty. *See, Abdul-Akbar v. McKelvie*, 239 F.3d 307, 317 (3d Cir. 2001) (“This requires us first to determine whether Appellant is a member of a suspect class or whether a fundamental right is implicated. Neither prisoners nor indigents are suspect classes.”) *Citing, e.g., Pryor v. Brennan*, 914 F.2d 921, 923 (7th Cir. 1990); *Harris v. McRae*, 448 U.S. 297, 323, (1980) (noting that poverty is not a suspect classification); (*But see, Lewis v. Casey*, 518 U.S. 343, 370 (1996) “[A]t all stages of the proceedings the Due Process and Equal Protection Clauses protect [indigent persons] from invidious discriminations.”)

18. “Because this case implicates the [Constitutionally protected] right of access to the courts,” in defense of my First Amendment rights, determining whether removing the substantial burden upon my religious beliefs and access to the courts by granting stay, to prevent needless or unduly burdensome costs, is determined under a strict scrutiny basis test. *Citing, Tennessee v. Lane*, 541 U.S. 509, 533 n.20 (2004).

19. The Supreme Court noted, “There can be no equal justice where the kind of trial a man gets depends on the amount of money he has.” *Lewis v. Casey*, 518 U.S. 343, 370 (1996); (internal citations omitted)



20. Justice Stevens, with whom Justice Brennan, Justice Marshall, and Justice Blackmun joined, in dissenting of US Supreme Court in *Murray v. Giarratano*, 492 U.S. 1, 18 (1989) recognized,

“When an indigent is forced to run this gantlet of a preliminary showing of merit, the right to appeal does not comport with fair procedure. . . . [T]he discrimination is not between ‘possibly good and obviously bad cases,’ but between cases where the rich man can require the court to listen to argument of counsel before deciding on the merits, but a poor man cannot. . . . The indigent, where the record is unclear or the errors are hidden, has only the right to a meaningless ritual, while the rich man has a meaningful appeal.” *Douglas*, 372 U.S., at 357-358

21. I expected to rejoin my old law firm after standing up for something more important than money in *Kelly v Trump*, my free exercise of religious-political belief, exercise of religious and political speech, and association as a party, attorney, democrat, and Christian, without government incited persecution, but for my exercise of fundamental rights.

22. Defendants’ state proceeding against me creates a government incited economic substantial burden upon me, and prejudices me by forcing me into a maintained state of poverty by preventing me from seeking to get my former position back at my old law firm as an attorney, or any work at a law firm. Defendants conduct harms my reputation to make me less attractive to employers should I alert my former firm or other firms of this proceeding against me, harming my prospects of employment by the libelous accusations against me. While, poverty is not a suspect class, my right to meaningful access to the courts, despite the inherent burden of poverty, and my religious beliefs and strongly held religious exercise relating to my religious belief against indebtedness is protected.

23. Fundamental First Amendment rights of speech, belief, exercise of belief, and association are implicated, in this case. Thus, this Court must have a compelling reason to deny

my request for a stay of the proceeding to prevent potentially irreparable to me, narrowly tailored to meet the important justification.

24. There is no compelling reason to deny my request for a stay. Defendants are not prejudiced, nor is the public. Nor is any justification narrowly tailored to meet any compelling reason. This Court must grant a stay. This Court may stay the case, with no prejudice, while potentially avoiding needless work for the court, the appellate courts and the parties.

25. However, I face an undue burden should this court deny my request for a stay of the proceeding. I risk loss of my First Amendment rights, property interest in my license, loss to my reputation, other damages, loss of employment opportunities and a substantial burden to my access to the courts.

#### **Legal Authority to grant a stay**

26. “This Court has discretion to stay a civil proceeding.” *Sec. & Exch. Comm’n v. Hvizdzak Capital Mgmt.*, Civil Action 1:20-154, at \*1-2 (W.D. Pa. Aug. 11, 2021); *Citing. Landis v. North American Co.*, [299 U.S. 248, 254](#) (1936); *Bechtel Corp. v. Local 215, Laborers’ Int’l Union*, [544 F.2d 1207, 1215](#) (3d Cir. 1976). “While staying a case is an extraordinary measure, *United States v. Breyer*, [41 F.3d 884, 893](#) (3d Cir. 1994),...courts will not hesitate to grant a stay when the interests of justice seem to require it.” *Id.*, *Citing, See Kashi v. Gratsos*, [790 F.2d 1050, 1057](#) (2d Cir. 1986); *see also United States Secs. and Exch. Comm’n v. Santillo*, No. 18 Civ. 5491, 2018 WL 6039324 (S.D.N.Y. Nov. 2, 2018); *Aluminium Bahrain B.S.C. v. Dahdaleh*, No. 8-299, 2012 WL 5305167 (W.D. Pa. Oct. 25, 2012); *Walsh Secs., Inc. v. Cristo Prop. Mgmt., Ltd.*, [7 F.Supp.2d 523](#) (D.N.J. 1998).

27. “The Court's discretion to stay a matter is ‘incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants. How this can best be done calls for the exercise of judgment, which must weigh competing interests and maintain an even balance.’” *Id.* Citing, *Landis*, 299 U.S. at 254-55. “In deciding how to exercise this discretion, the Court must ‘initially assess to what extent the issues in ... cases overlap, and consider the status of the ... case, including whether the defendant has been indicted.’” *Id.* Citing, *Int'l Fidelity Ins. Co. v. Podlucky*, No. 07-0235, 2007 WL 2752139, at \*2 (W.D. Pa. Sept. 19, 2007) (citing *In re Derivative Litig.*, No. 06-02964, 2007 WL 1101276 (E.D. Pa. April 11, 2007)). “Then, the Court must weigh the following factors: (1) the plaintiff's interests and the potential prejudice to plaintiff of a delay; (2) the prejudice to the defendant; (3) the interest of the Court; (4) the interests of third parties; and (5) the interest of the public..” *Id.* Citing, *Golden Quality Ice Cream Co., Inc. v. Deerfield Specialty Papers, Inc.*, 87 F.R.D. 53, 55 (E.D. Pa. 1980)).

28. Per the Western District of Pennsylvania District Court, in *Sec. & Exch. Comm'n v. Hvizdzak Capital Mgmt.*, Civil Action 1:20-154, at \*2 (W.D. Pa. Aug. 11, 2021), “the Court is not to consider whether [the civil matter and disciplinary matter] ‘overlap in their entirety,’ but whether and to what extent the issues overlap.” *Id.* “The record presently before the Court [in my case] demonstrates adequate similarity of issues weighing in favor of a stay.” *Id.* at \*3 The case relates to some of the same facts and issues, albeit not all.

### **Interest of the Court**

29. The Court has a strong interest in judicial efficiency. Staying this action could restructure the proceeding in this Court because collateral estoppel could prevent re-litigation of

issues adjudicated on appeal in the original disciplinary matter. Thus, the interests of the Court weigh in favor of a stay, to prevent needless waste of judicial resources, by a superseding US Supreme Court decision.

**Defendant's Interests, third parties interests and the public's interest**

30. There is no prejudice towards the Defendants, third parties or the public by a delay, should a stay be granted. I agree not to practice law in this jurisdiction, without this court's authorization. I require time and meaningful opportunity to both defend myself on appeal in the original proceeding, and to also present my case in the civil rights proceeding.

31. The public and third parties are not harmed by a stay. Yet, the public may be harmed if a stay is not granted, by setting a precedent that the state may eliminate Constitutional liberties in a government compelled exchange for the license to buy in sell in a profession, to force its will upon citizens to serve business greed, not good. Should I not be granted meaningful opportunity to contest the original case on appeal to the US Supreme Court, then every citizen may be in danger of being adjudicated disabled, for merely believing differently than the state, or for standing up for their religious-political beliefs in Court.

**The need to preserve the right to plead the defense of Good cause in a motion at a later time**

32. I have good cause to contest the decision the Delaware Supreme Court made in placing me on disabled inactive, but for the exercise of my First Amendment right to religious-political speech, religious-political belief, religious-political-exercise, and my exercise of the right to make religious-political petitions. Yet I am impoverished. I lack time and resources to

fight both the appeal and the civil rights case and 6 other potential reciprocal cases simultaneously. Albeit, I may have to appeal the Third Circuit's automatic decision which disparately treats attorneys adjudicated disabled by affording them fewer Constitutional protections than attorneys disbarred and suspended attorneys, before the US Supreme Court. It appears the Third Circuit only allows disbarred and suspended attorneys to contest the original disciplinary proceeding on due process and Constitutional grounds, not lawyers adjudicated disabled like me. See, R.A.D.E 6 and 16.

33. In the interest of justice, this court must not sacrifice my meaningful opportunity to be heard in all cases, by denying a stay. This court must preserve my right for a meaningful opportunity to be heard, without waste of judicial resources or prejudice towards me, by granting a stay.

34. I seek to void the Delaware Disciplinary decision in the civil rights case, in addition to other relief. Should the US Supreme Court rule in favor or against me, in the original disciplinary case, it will likely affect the outcome of this Court's determination based on the same and similar facts.

35. In addition, new and additional facts seem to consistently arise in my case that are material to my defense in the outcome of this proceeding.

36. Denial of a stay would cause a substantial burden upon my access to the courts due to my poverty, limited time, resources, and my religious beliefs against indebtedness. Should a stay be denied, I would be required to expend limited resources on all matters, only to risk running out of resources. This would prevent me the ability to plead and defend my case in

any matter. I beg you for a stay, to prevent potentially needless costs, and sacrifice of my First Amendment liberties.

37. The Disciplinary proceeding prevents me from seeking to rejoin my former law firm, where I intended to perform real estate settlements. I am impoverished, and have cancelled my car insurance as unaffordable. I have been getting allergy related diarrhea from biking to the post office. I do not have the means to fight all reciprocal suits at once.

38. The Delaware Court's members, agents and/or their arms have selectively persecuted me, with disparate treatment based on religious-political animus, poverty animus and place of origin animus, for years, even prior to my admission to the Delaware bar. Notably, two judges persecuted me based on place of origin animus. Retired Court of Common Pleas Judge, Smalls called me a "Philadelphia lawyer" during my first proceeding as if that was a bad word. Judge Slights told me to "go back to Pennsylvania" after I answered a question correctly, and appeared to steal his thunder. His face was not smiling, and he was seriously scolding me.

39. When I ran for office in 2018 in Delaware, I made a bumper sticker to combat the prejudice by the state, including Delaware judges, that stated "There is no Delaware Way. There is an American way where we respect all people regardless of race, religion, or place of origin, (even Pennsylvania)." I placed it on my vehicle.

40. The imposition of the identical discipline by the Court would be unwarranted in this case. The procedure was so lacking in notice or opportunity to be heard as to constitute a deprivation of due process. There was such an infirmity of proof establishing the misconduct as to give rise to the clear conviction that this Court could not, consistent with its duty, accept as

final the conclusion on that subject. The imposition of the same discipline by this Court would result in grave injustice

41. I plead with this court to grant a stay. Please afford me the opportunity to plead my case concerning the defects in the Delaware Disciplinary proceeding, after a final nonappealable decision is granted in the originating disciplinary case.

### **Prejudice against me, the Respondent, is Great**

42. The prejudice against me should a stay be denied is great in the form of additional loss of my fundamental rights, and other hardships, related to the loss of my former position at a law firm, and government compelled poverty.

43. I have good cause to contest the decision the Delaware Supreme Court made in placing me on disabled inactive, but for the exercise of my First Amendment right to religious-political speech, religious-political belief, religious-political-exercise, and to make religious-political petitions. Yet I am impoverished. I lack time and resources to fight both the appeal and the civil rights case and 6 other potential reciprocal cases simultaneously. I will face irreparable injury if a stay is not granted. *Hilton v. Braunskill*, 481 U.S. 770 (1987).

### **State Court additional facts background**

44. On 8/15/22, I filed a Motion for good cause with the Delaware Supreme Court (hereinafter “state-court”), 1. Pursuant to Supreme Court Rule 9, to Unseal the Record, 2. to declare self-regulation of attorneys, other Professions, and judges unconstitutional, making business above the law, by making the dictates of professionals, or bureaucrats within agencies, as opposed to laws enacted by congress people, checked by the vote of the people, the law, and

3. in lieu of and in the alternative, eliminate the secret trial requirements of professionals before Boards, including the Board on Professional Responsibility, requiring the choice of an open or confidential forum left to the accused professional, instead of requiring a secret proceeding, concealing the accused's defense, to the advantage of the accuser state, in violation of equal protections, and due process 1st and 14th Protections, incorporated herein by reference. (DI 85-6)

45. On 8/19/22, I filed, a Motion to 1. declare the Reporting Requirements unconstitutional, requiring by written rule I violate my 5th Amendment right not to testify against myself to the government in order that the government may have evidence to prosecute me, 2. Declare the Case and Controversy requirements are not met in the system of attorney self-regulation, and related documents, I incorporate herein by reference. (DI 85-8)

46. On 8/19/22, Defendant Kathleen Vavala ("Kathleen") reached out to me indicating she had allegedly contacted every jurisdiction I am licensed to practice law in, and to reject my request for extensions of time.

47. Instead of fighting Kathleen for time do a better job, I filed a Motion for Reargument immediately, the next day 8/20/22.

48. On 8/20/22, in reliance of Kathleen's assertion, I also rode my bike 8 plus miles round trip, to mail out reporting information to two jurisdictions in receipt of merely my letter invoking the Fifth Amendment. (Exhibit C)

49. I desired to avoid automatic discipline for failure to report the Order Kathleen allegedly sent to other jurisdictions including the Pennsylvania Supreme Court and the United States Supreme Court.



50. On 8/22/22, I mailed out boxes of the state court's record to the US Supreme Court.

51. Kathleen did not report the order to the Supreme Court of PA or the US Supreme Court.

52. I previously, pled the Fifth Amendment and asked for a waiver of the reporting requirements from the arm of the Pennsylvania Supreme Court or for additional time to report should a waiver be denied. (Exhibit D)

53. Pennsylvania Rules of Disciplinary Enforcement Rule § 91.51 (5), requires I self-incriminate within 20 days or face other discipline.

54. As a result, of my reliance to my detriment on Kathleen's statement, I incriminated myself before the Pennsylvania Supreme Court. Disciplinary proceedings have commenced. US Amend V.

55. By good luck, the US Supreme Court rejected my 8/20/2022 reporting letter. (Exhibit E)

56. Nevertheless, the Eastern District of PA's District Court's admissions officer verbally indicated, she will report the outcome to the US Supreme Court if I fail to respond to the court's 30 day reciprocal discipline letter, in a timely fashion.

57. Upon second glance, I think the admission's officer may be mistaken. (Exhibit F)

58. I filed various documents and motions in the Delaware Supreme Court I include herein by reference, in DI 85.

59. On 8/27/2022, I filed a letter with Delaware Supreme Court, where I sought permission to outline legal theories the Court may reverse or prevent an economic crash. In the letter, I outlined the conflict of interest the Federal Reserve has in its role in how money is coined. I also noted my intent to seek a mistrial for Kelly v Trump, and outlining the conflict of interest the Federal Reserve has in its role in requesting paper money for the banks. (Exhibit G)

60. On 9/2/2022, I filed Respondent Meghan Kelly's Motion pursuant to Supreme Court Rule 8, for good cause, to waive record, transcript fees and court costs by the Clerk and this Court for the transfer and preparation of this Court's docket or record to other courts, under Rules 9 and 20, should other courts require this court's record (Exhibit H)

61. On 9/7/2022, the Court granted my waiver of fees for any court requesting the Delaware Disciplinary record, but denied all other motions.

62. The State-Court wrongly limits my property interest in my license, as punishment for the exercise of my First Amendment rights, because the Court disagrees with my religious-political beliefs, contained in the speech in the petitions..

64. The State-Court also requires denies my requests for exemptions, and requires I violate my religious beliefs against mental or health examinations, and against representation in defense of my belief in Jesus despite my religious beliefs, and 6<sup>th</sup> amendment right to represent myself, should I reopen the case.

65. The State-Court also requires I violate my religious belief against declaration and swearing in, and denies all my arguments reasserted in my Objection, Reply, other documents, and raised in the Motion for reargument.

66. I must be afforded the opportunity to amend my complaint to include additional facts and to add additional relief.

67. I move this Court to allow me to amend my complaint as a matter of course, pursuant to Fed. R. Civ. P. 15 (a) (1), 30 days after a final determination is made on appeal of the disciplinary proceeding before the US Supreme Court.

68. This Court did not permit me to serve the original complaint. (D.I. 16-17, 30-31, 59-60).

69. This Court did not permit me to file an Amended Complaint, and denied me a ruling on it. (D.I. 43, 59-60).

70. Since, then the need to amend again, has become apparent, as I discovered more evidence of the sham proceeding. I seek to preserve my right to amend the complaint as a matter of course, pursuant to Fed. R. Civ. P. 15 (a), as well as in the interest of justice under other provisions of Fed. R. Civ. P. 15. (See, *De La Cruz-Saddul v. Wayne State University*, E.D.Mich.1980, 482 F.Supp. 1388 “Plaintiff had right to amend without leave where no answer had been filed.”); (Also see, *Adams v. Quattlebaum*, D.D.C.2004, 219 F.R.D. 195 “Plaintiff enjoys absolute right to amend complaint once at any time prior to responsive pleading or granting of motion to dismiss.”)

71. No complaint has been served, and no answer has been filed to any motion to amend the complaint. (DI 2, 43). See, *Centifanti v. Nix*, 865 F.2d 1422 (3d Cir. 1989) (“Federal district court abused its discretion in denying motion by attorney in civil rights action against Justices of Pennsylvania Supreme Court for leave to amend complaint to delete excessive detail unnecessary to mount general constitutional challenge to procedural rules under which Supreme Court

considered petitions for reinstatement of suspended attorneys.”); *Murphy v. Off. of Disciplinary Couns.*, No. CV 17-1239, 2019 WL 4752059, at \*26 (E.D. Pa. Sept. 30, 2019), *aff’d*, 820 F. App’x 89 (3d Cir. 2020) (“While recognizing that Murphy is not the typical pro se plaintiff, [because he is a lawyer], a district court should generally provide a pro se plaintiff with leave to amend unless amending would be inequitable or futile. See *Grayson v. Mayview St. Hosp.*, 293 F.3d 103, 114 (3d Cir. 2002) (stating general rule)).

72. A stay until 30 days after a final determination of the State-disciplinary proceeding by the US Supreme Court is appropriate. Dismissal is an abuse of discretion. See, *Deakins v. Monaghan*, 484 U.S. 193 (1988) (“Federal district court must stay rather than dismiss claims that are not cognizable in parallel state proceeding.”); *Id* at 202, (“In reversing the District Court’s dismissal of the claims for damages and attorney’s fees, the Court of Appeals applied the Third Circuit rule that requires a District Court to stay rather than dismiss claims that are not cognizable in the parallel state proceeding.”); *Yamaha Motor Corp. v. Stroud*, 179 F.3d 598 (8th Cir. 1999); *Carroll v. City of Mount Clemons*, 139 F.3d 107(6th Cir. 1998); *Quackenbush v. Allstate Ins. Co.*, 517 U.S. 706, 719 (1996) (“we have applied abstention principles to actions ‘at law’ only to permit a federal court to enter a stay order that postpones adjudication of the dispute, not to dismiss the federal suit altogether.”); *Abbott v. Mette*, No. 20-CV-131-RGA, 2021 WL 1168958, at \*4 (D. Del. Mar. 26, 2021), *aff’d*, No. 21-1804, 2021 WL 5906146 (3d Cir. Dec. 14, 2021) (A court “has no discretion to dismiss rather than to stay claims for monetary relief that cannot be redressed in the state proceeding.”); *Abbott v. Mette*, No. CV 20-131-RGA, 2021 WL 327375, at \*3 (D. Del. Jan. 31, 2021) (“As a general matter, assuming that a federal court has jurisdiction over a case, the federal court’s “obligation to hear and decide [the] case is virtually unflagging.” *Sprint Commc’ns, Inc. v. Jacobs*, 571 U.S. 69, 77 (2013)

(internal quotation marks and citation omitted)); *Crane v. Fauver*, 762 F.2d 325 (3d Cir. 1985) (“District court should have retained jurisdiction over correctional officers' civil rights action arising out of their discharge, even if it properly declined to exercise jurisdiction over federal claims, and stayed action pending outcome of related state proceeding where officers were relegated for prudential reasons to state proceeding which could only afford them dismissal of charges and back pay, with attorney fees only to extent that back pay award was reduced by interim earnings, but officers sought constitutional damages and attorney fees, and new complaint upon termination of state proceedings may have been time-barred.”); *Williams v. Hepting*, 844 F.2d 138, 145 (3d Cir. 1988) (The Third Circuit held, “Accordingly, we hold that the district court should have stayed instead of dismissed without prejudice...Because these particular federal court claims for damages seek relief that is unavailable in Williams' ongoing state proceedings, the allegations should be stayed pending the outcome of his state court appeal on the underlying conviction.”); *Nimer v. Lichfield Twp. Bd. of Trustees*, 707 F.3d 699; *Carroll v. City of Mount Clemens*, 139 F.3d 1072 (6th Cir. 1998); *Watkins v. Ohio Dep't of Educ.*, No. 2:21-CV-04482, 2022 WL 672565, at \*8 (S.D. Ohio Mar. 7, 2022)(“ Further, when a plaintiff seeks both equitable and legal relief, many courts in the Sixth Circuit stay the entire case rather than treat each form of requested relief differently.”); *Brindley v. McCullen*, 61 F.3d 507, 509 (In a § 1983 action for damages, the Sixth Circuit ruled that when Younger abstention is invoked, stay rather than dismissal is the appropriate disposition. A stay “avoids the costs of refiling, allows the plaintiffs to retain their place on the court docket, and avoids placing plaintiffs in a sometimes difficult position of refiling their case before the statute of limitations expires.”); *Maraan v. Off. of Ohio Disciplinary Couns. for Supreme Ct. of Ohio*, No. 1:18CV645, 2021 WL 3173311, at \*3 (S.D. Ohio July 27, 2021) (Court “stayed until the conclusion of the

state disciplinary proceedings, rather than be dismissed.”), citing, *Kalniz*, 699 F. Supp. 2d at 975 (explaining that where a plaintiff is bringing constitutional civil rights claims in a federal court case in which Younger abstention was proper, the stay protects against the possibility that the statute of limitations could deprive the plaintiff of the opportunity to present the merits of her damages claims); *Yamaha Motor Corp. v. Stroud*, 179 F.3d 598 (8th Cir. 1999)(when damages are sought in § 1983 action subject to Younger abstention, and damages are not available in pending state proceeding, federal action should be stayed, not dismissed); *Night Clubs, Inc. v. City of Fort Smith*, 163 F.3d 475 (8th Cir. 1998) (when § 1983 complaint seeking damages is subject to Younger abstention, federal action should be stayed rather than dismissed); *Centifanti v. Nix*, 865 F.2d 1422 (3d Cir. 1989) (“**Suspended attorney who had been denied reinstatement to bar brought civil rights action against Chief Justice and Justices of Pennsylvania Supreme Court** alleging various **constitutional defects in procedural rules** under which Supreme Court considers petitions for reinstatement of suspended attorneys.....The Court of Appeals, Cowen, Circuit Judge, held that: (1) federal district court had subject-matter jurisdiction; (2) **district court abused its discretion in denying attorney's motion for leave to amend complaint**; (3) district court properly denied attorney's motion to compel discovery of privileged documents; and (4) attorney's complaint was not barred by state statute of limitations for **tort actions** or by principles of res judicata.”)

Wherefore, I pray this court grants this motion.

Dated:

Respectfully submitted,

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Meghan Kelly, Esquire  
 34012 Shawnee Drive  
 Dagsboro, DE 19939,  
 (302) 493-6693, [meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com),  
 No 4968, Inactive, pro se

# Exhibit 13

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF MEGHAN KELLY'S THIRD AFFIDAVIT UPDATE

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

1. On November 30, 2022, the United States Supreme Court granted my motion for an extension of time to appeal the Delaware Disciplinary proceeding per the attached Exhibit 1, I incorporate herein by reference.

2. On November 30, 2022, the PA Supreme Court also granted an extension of time until December 23, 2022 to respond to an order, but the PA Supreme Court rejected my letter providing an update that the US Supreme Court accepted a filing. I incorporate the rejection and letter as Exhibit 2.

3. I called the Court because it is material to my outstanding motions that I may potentially be heard before the US Supreme Court, including my Motion for reargument on the PA Supreme Court order denying my stay.

4. Should the US Supreme Court hear my appeal, its findings may make the reciprocating order moot should it be vacated.



5. Additionally, I would prefer all witnesses be called before your Honorable District Court instead of calling witnesses multiple times potentially needlessly hundreds of miles away from their homes in Pittsburgh, PA or before the US Supreme Court in DC.

6. If the attached letter labeled in Exhibit 2 remains rejected, I may file I motion before the PA Supreme Court.

Thank you for your time and consideration.

November 30, 2022 Respectfully submitted,

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Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
(302) 493-6693  
INACTIVE 4968

# Exhibit 14

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF MEGHAN KELLY'S FIFTH AFFIDAVIT UPDATE

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

1. PA Clerk of Court Nicole Traini rejected the Motion to Amend my motion of reconsideration, despite my case manager Josh's kind suggestion to file it. I referred to and attached this rejected Motion to the Fourth Affidavit, DI 103.

2. On or about December 19, 2022, I filed the attached, *Respondent Meghan M Kelly's Second Motion for a stay due to circumstances increasing prejudice and harm, new facts arising necessary to my defense of reciprocal order, and additional questions that require answers in order to defend myself in response to the reciprocal order in the alternative a continuance of 6 months*, incorporated herein as Exhibit 1. I wish I was afforded opportunity in terms of time to shorten it, and research more thoroughly, but I am fighting for time. I have been submitting things imperfectly in order to not waive my rights.

3. I do not know whether the PA Supreme Court Clerk Nicole Traini will deny me an opportunity to be heard by rejecting the document, just as she refused to file the letter.

4. PA Case manager Josh told me the Court and he will not review documents if it they are not on the docket. He indicated he will not review the rejected letter or other rejected

documents I previously submitted. This prejudices me by denying me an opportunity to be heard should this latest motion be rejected too.

5. PA ODC also filed a response to my Second Motion to Dismiss for lack of subject matter jurisdiction on December 13, 2022. He alludes to In the Matter of Charles Dee Septowski's reciprocity petition, a Texas attorneys' petition whose case is distinguished from mine in that he engaged in misconduct prior to his retirement in PA in 2010. I am not at liberty to attach the petitions since they remain confidential.

6. The First petition for misconduct against Texas Attorney Charles Dee Septowski's was filed on or about December 18, 2009.

7. PA ODC misleading alleges that I said "all" of the misconduct when I asserted correctly that misconduct occurred prior to Texas Attorney Charles Dee's retirement in 2010. The PA rules allow for discipline, which occurred prior to retirement, while the Texas attorney had an active license to practice law.

8. PA ODC concedes that each and every one of the other cases he cites, but I distinguished are distinguished from mine in that the claimants did not contest the reciprocal discipline.

9. How may the Court know when the misconduct arose if no attorney facing discipline contests it.

10. I have not had time to respond to December 13, 2022 PA-ODC's answer in response to my Second Motion to Dismiss.

11. On December 20, 2022, PA-ODC filed an Answer to motion for the clerk to accept my rejected exhibits and exhibits included in additional pleadings.

12. I do not have the ability to draft an answer by Friday December 23, 2022. Because the Clerk refused to accept three filings where I allege, I am prejudiced by denial of a stay or an extension of time, it is not on the record.

13. PA Supreme Court previously rejected a 45-day extension, but later granted a 14-day extension.

14. I hope the Court accepts the most recent document I filed and does not deny me a meaningful opportunity to be heard.

15. I do not feel well at all. I risk death if not granted time to rest, exercise, drink water and care for myself as I have alleged before God and man, in Exhibit 43 to DI 4. I told the Delaware Supreme Court, the Chancery Court, the Third Circuit, the Pennsylvania Supreme Court in the same exhibit.

16. I am accustomed to people having hardness of hearts. I must assert my right to live, to live for God, even if others do not want to be inconvenienced by my limitations.

17. Every month I lose five pounds of water weight and require gallons of water. I have not had the time or the means to drink so much and I am quite dehydrated beyond a week.

18. I am not afforded water and time to care for myself. My mouth is dry and my teeth are getting damaged by the severe dehydration. I feel weak, dizzy and badly due to severe dehydration. I literally must drink gallons of water, but am denied time.

19. Water and time are the cure, not healthcare. I have religious objections to healthcare. Bad health care is why I suffer.

20. I believe PA ODC's goal is to bury me in paper to prevent my appeals to the US Supreme Court, without regard to my life health despite notice by previous filings.

21. I believe the Courts are in danger. I filed the attached with the Third Circuit, Exhibits 2 and 3, alerting the court while I am afforded an opportunity.

22. The judiciary is in danger. Without people judges lawlessness, business greed without restraint from oppressing, killing, stealing and destroying may reign. This risk must be extinguished with the rule of law, not popularity contests, the vote or societal peer pressure.

23. We are all in danger without people judges. There is no one to protect individuals or individual liberty from being sacrificed to entities under the guise of the common good.

Thank you for your time and consideration.

Dated: December 20, 2022 Respectfully submitted,

---

Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
(302) 493-6693  
INACTIVE 4968

# Exhibit 15

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF MEGHAN KELLY'S TWENTY FIRST AFFIDAVIT UPDATE

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

1. On March 29, 2023, I sent United Supreme Court staff's emergency clerk Robert Meek an email regarding *inter alias* my concerns delays in docketing the latest pleading may prejudice me as to render my matter moot given my emergency situation. (Exhibit 1)

2. On March 30, 2023, I received the electronic notification via email US Supreme Court scheduled the petition for April 14, 2023. (Exhibit 2).

3. I was devastated. April 14, 2023 is too late to grant me relief as to deny me access to appeal in the Delaware Disciplinary case which is due April 8, 2023. I simply cannot sue in all cases due to my poverty being a substantial burden, my religious beliefs against debt, lack of time, and my invocation of the 13<sup>th</sup> amendment unless the Court granted me an accommodation.

4. The US Supreme Court showed me it would not help me by convening the conference on April 14, 2023.

5. I cried at this apparent loss, but I acted quickly. On April 1, 2023, with tears in my eyes I submitted the attached Motion to withdraw both my application with Justice Jackson and my petition for judgement by US mail. However, I only uploaded on docket number No. 22-6783. (Exhibit 3). The Court was scheduled to receive this motion on April 3, 2023.



6. On April 5, 2023, the Court rescheduled both the application and the petition before judgement to April 21, 2023. (Exhibit 4)

7. I was confused. I did not understand why the Court rescheduled a petition I moved to withdraw as relief would be granted too late as to render my request moot.

8. I saw that I forgot to upload the withdraw on the Application. So, I uploaded the pleading on April 5, 2023. (Exhibit 5)

9. The Court never accepted my motion to withdraw for docketing yet despite the fact the post office indicated likely receipt would be April 3, 2023. I called my case manager. She indicated I did not have to send out another motion. She said the Court sees it on the docket even if they did not accept it as filed yet.

10. I sent Robert Meek an email to confirm receipt of my motion to withdraw and my confusion as to why the Court must convene March 21, 2023. (Exhibit 6)

11. I also sent opposing counsel and US AG David Weiss an email hoping they would prevent the slow overthrow of the government to the private and foreign partners. (Exhibit 7)

12. I proposed they consider using the contracts clause of the constitution to protect individuals, recipients of social security, government workers pay and their pensions as opposed to entities accepting grants and contracts. I argue entities should be deemed unprotected by the Contracts clause as agents of the government not protected as individuals. This is not the law, but should be the law to preserve our government by caring for its workers, sustaining them, not sacrificing them and the people for entities without hearts who gain unjust gains.<sup>2</sup>

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<sup>2</sup> See, the dicta in *Weinberger v. Salfi*, 422 U.S. 749, 772 (1975)”; “Like Social Security, and unlike most private pension plans, railroad retirement benefits **are not contractual**. Congress may alter, and even eliminate, them at any time.” This should change to protect those who accept social security, government pay as government employees and government pensions. Also see, *Frisbie v. United States*, 157 U.S. 160, 166 (1895) (“The pension granted by the government is a matter of bounty. “No pensioner has a vested legal right to his pension. Pensions are the bounties of the government, which Congress has the

13. I believe people who give and receive government grants and contracts on behalf of an entity sin and commit lawlessness by creating an oppressive slave forced market, not free and fair, in violation of US Amend I (as applied to me with regards to my religious beliefs), US Amend XIII, and U Amend V, the Equal Protections component of the 5<sup>th</sup> Amendment by disparately treating recipients based on political capital, favoritism, and costs and speculating material gains creating an unfair economy. I have religious beliefs against partiality. See, *James* 2:9 (“But if you show favoritism, you sin and are convicted by the law as lawbreakers.”). Government grants based on partisan support creates an unequal application of the rule of law through policies though the case law in the Third Circuit and some others allows it.<sup>3</sup> The case

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right to give, withhold, distribute, or recall, at its discretion. *Walton v. Cotton*, 19 How. 355.” *United States v. Teller*, 107 U.S. 64, 68. Congress being at liberty to give or withhold a pension, may prescribe who shall receive it, and determine all the circumstances and conditions under which any application therefor shall be prosecuted. No man has a legal right to a pension, and no man has a legal right to interfere in the matter of obtaining pensions for himself or others. The whole control of that matter is within the domain of Congressional power. *United States v. Hall*, 98 U.S. 343.”) Federal pay and federal pensions of contracted employees should be protected under the Contracts Clause to prevent impending harm. Without federal employees, there is no federal government.

<sup>3</sup> *Lundblad v. Celeste*, 924 F.2d 627, 628 (6th Cir. 1991); (“We conclude that no legal principles developed under the Equal Protection Clause “clearly establish” that state officials may not award public contracts on the basis of partisan politics or party affiliation. In *Rutan v. Republican Party of Illinois*, \_\_\_ U.S. \_\_\_, 110 S.Ct. 2729, 111 L.Ed.2d 52 (1990), *Branti v. Finkel*, 445 U.S. 507, 100 S.Ct. 1287, 63 L.Ed.2d 574 (1980), and *Elrod v. Burns*, 427 U.S. 347, 96 S.Ct. 2673, 49 L.Ed.2d 547 (1976), the Supreme Court has developed principles under the First Amendment prohibiting the hiring and firing of employees on a partisan political basis, but the Court has not developed such principles under the Equal Protection Clause, nor has it extended these First Amendment principles to the area of public contracts.”); *Labalokie v. Capitol Area Interm. Unit*, 926 F. Supp. 503, 507 (M.D. Pa. 1996) (“Clearly, partisan politics lies at the very core of our democratic process, and just as clear is the notion that permitting those who hold public office to employ independent contractors based on political party affiliation provides an effective method to implement the administrations’ program. Policy implementation is just as important as policymaking”); *Downtown Auto Parks, Inc. v. City of Milwaukee*, 938 F.2d 705, 708 (7th Cir. 1991); *But see, McBee v. Jim Hogg County*, 730 F.2d 1009, 1026-18 (5th Cir. 1984) (“The spoils system, which views public employment as pure political patronage, inhibits the free functioning of the electoral process. ‘Conditioning public employment on

partisan support prevents support of competing political interest.' By holding a public employee's job hostage to his political activities or affiliation, the rebirth of the spoils system sanctioned by the majority allows an incumbent or a victorious challenger to accomplish indirectly what neither could legally do by mandate: the coercion of political support from the public employee."); *Elrod v. Burns*, 427 U.S. 347, 357 (1976) ("Patronage, therefore, to the extent it compels or restrains belief and association, is inimical to the process which undergirds our system of government and is "at war with the deeper traditions of democracy embodied in the First Amendment." *Illinois State Employees Union v. Lewis*, 473 F.2d, at 576. "); But see, *Umbehr v. McClure*, 44 F.3d 876, 879-80 (10th Cir. 1995) (This Court outlined cases in other of other jurisdictions where independent contractors may be eliminated based on the exercise of First Amendment liberties including speech criticizing politicians or political groups, and came to the opposite conclusion by protecting independent contractors for political criticism.). It appears there is a split. The Court in *Umbehr v. McClure*, 44 F.3d 876, 879-80 (10th Cir. 1995) noted, ( A "number of courts have held that governments may award or terminate public contracts on the basis of political affiliation or support. See *Triad Assocs., Inc. v. Chicago Hous. Auth.*, 892 F.2d 583 (7th Cir. 1989) (holding that independent contractor claiming loss of and denial of contracts because of political affiliation was not protected by First Amendment), cert. denied, 498 U.S. 845, 111 S.Ct. 129, 112 L.Ed.2d 97 (1990); *LaFalce v. Houston*, 712 F.2d 292 (7th Cir. 1983) (holding that independent contractor claiming denial of public contract because of political affiliation was not protected by First Amendment), cert. denied, 464 U.S. 1044, 104 S.Ct. 712, 79 L.Ed.2d 175 (1984); ***Horn v. Kean*, 796 F.2d 668 (3d Cir. 1986)** (en banc) (holding that **independent contractors whose contracts were terminated following a change in administration were not protected by the First Amendment**)(emphasis to show our Circuit rules the wrong way in favor of corruption and the partial application of the rule of law by government money and partial backing); *Sweeney v. Bond*, 669 F.2d 542, 545 (8th Cir.) (holding that fee agents who were not employees but were "more in the nature of independent contractors" who were dismissed following a change in administration were not protected by the First Amendment); *Ambrose v. Knotts*, 865 F. Supp. 342, 345 (S.D.W.Va. Oct. 17, 1994) (holding that independent contractor claiming termination of contract in retaliation for petition was not protected by First Amendment); *O'Hare Truck Serv., Inc. v. City of Northlake*, 843 F. Supp. 1231, 1234 (N.D.Ill. 1994) (holding that independent contractor claiming removal from city towing rotation list because of political affiliation was not protected by First Amendment); *Inner City Leasing and Trucking Co. v. City of Gary*, 759 F. Supp. 461, 464 (N.D.Ind. 1990) (holding that independent contractor claiming termination of contract because of political affiliation not protected by First Amendment); *MEDCARE HMO v. Bradley*, 788 F. Supp. 1460, 1464-66 (N.D.Ill. 1992) (holding that independent contractor claiming termination of contract because of lobbying and other political activities not protected by First Amendment); see also *Lundblad v. Celeste*, 874 F.2d 1097, 1102 (6th Cir.), vacated, 882 F.2d 207 (6th Cir. 1989), reinstated in pertinent part, 924 F.2d 627 (6th Cir. 1991) (en banc) (holding that it was not clearly established that independent contractor claiming denial of public contract because of political affiliation was protected under First Amendment), cert. denied, 501 U.S. 1250, 111 S.Ct. 2889, 115 L.Ed.2d 1054 (1991). But see *Horn*, 796 F.2d at 680-85 (*Gibbons*, *Sloviter*, *Mansmann*, *Stapleton*, JJ., dissenting) (rejecting view that independent contractors can be treated differently than employees for First Amendment purposes).

law is wrong. I note, there seems to be a split by at least one court. Partiality based on political support in return for government contracts creates an unlevel unfair playing field where only those who have something to bribe politicians with may gain an advantage or control over a fixed, forced slave economy. I believe that politicians eliminate freedom through oppressive policies when they create jobs in a fixed unfair forced market. I believe politicians commit lawlessness leading to hell when they create a controlled market by creating jobs by government backing of private or foreign partners through money, instead of enacting laws to require goods and services which work, last and do not pollute and by made to break replacement parts, including chips. Manufacturers and individuals within businesses, not consumers, should be required to bear the cost of insurance, broken products and pollution the manufacturer and businesses create. People should not be enslaved to work to pay for services or replaced products that are made to break by design to increase profits. I believe free speech and freedom of conscience by criticism helps us learn and improve products and services. Those who focus on profits sacrifice people to create worse products and services to increase need to sustain their greedy gain. I actually am sad for those who give and receive government grants and contracts to entities to serve business greed as opposed to need to individuals directly because I believe they will be thrown into the fires of hell as too disgustingly dirty to live for eternity should they not repent. The Bible teaches those who receive unjust gains through oppression sin. It is a dirtiness of hearts, foreheads and hands. They receive favoritism by the government partiality creating an unequal unfair level playing field in a fixed not free subpar market with poorly made goods and services.

14. My religious beliefs are my own genuinely held religious beliefs. I share my religious beliefs not to compel the Court to believe as I do, or to prove my religious beliefs are the truth, but because

- 1) My religious beliefs are in issue as the wrongful reason the Defendants attacked me in violation of the witness tampering statute 1985 to cause me to forgo my lawsuit in *Kelly v Trump*.
- 2) My religious beliefs outlined in my petitions is also the reason Defendants admitted to bringing the disciplinary law suit against me for holding the government to the law against establishment of government religion in *Kelly v Trump*.
- 3) My religious beliefs are protected under the First Amendment.
- 4) And my religious beliefs may grant me unique standing in another case to reverse or prevent a crash or the schemed slow overthrow of our government.

15. I am pretty devastated the government thinks my religious beliefs in Jesus are so repugnant they do not deem me worthy of buying and selling as an attorney.

16. The US Supreme Court once announced, "It is wise to remember that the taxing and **licensing power** is a dangerous and potent weapon which, in the hands of unscrupulous or bigoted men, could be used to **suppress freedoms and destroy religion** unless it is kept within appropriate bounds. " *Follett v. McCormick*, 321 U.S. 573, 579 (1944)(emphasis intended).

17. The licensing power should not be used to eliminate my religious beliefs, even if the majority and the state believes differently than I do.

18. I have religious beliefs against the improper way money is coined and distributed which may grant me standing in another case to reverse or prevent an economic crash.

19. I have religious beliefs against debt. Money is coined out of debt by banks through fractional reserve or as of 2020 no reserves. Money is also coined through the federal reserve because Congress wrongly gave its coning power away to banks who gain more profit the worse off and more debt we are in. There is a conflict of interest.

20. The government should not have any debt. The government should not require taxes either. If the Federal government coined without enslaving the people to pay it back with interest to the banks, the government would protect freedom. US Amend XIII.

21. Under Article I, Section 8, Clause 5: “[The Congress shall have Power . . . ] To coin Money, regulate the Value thereof, and of foreign Coin, and fix the Standard of Weights and Measure.”

22. Congress wrongly gave away its coining power to the banks. The banks create money out of debt violating the 13th amendment by compelled servitude to pay the debt plus interest. This makes money master to pay for freedom from bondage to debt misleading people to hell. The Federal Reserve has made money a commodity to buy and sell instead of a tool to serve the people as a means of exchange. Congress should determine the value of money, not banks who manipulate interest for self gain.

23. Congress should take its coining power back, and should not borrow in violation of the 13<sup>th</sup> Amendment despite the fact Article I, Section 8, Clause 1: permits congress to create taxes “to pay the Debts and provide for the common Defense and general Welfare of the United States.”

24. If Congress coined money without enslaving the people and the government to debt, it would not require taxes to pay off debt. There would be no debt. The Government could coin money correctly to serve as opposed to enslave the people while protecting their liberty to buy and sell as they choose with the limit of just laws to prevent oppression, slavery, killing, stealing and destroying of others to serve the bottom line. The government would coin based on need, not exploitation to serve business greed.

25. Money should be the government's servant by coining without debt and interest to care for not control a free people. Presidents Lincoln and President attempted to coin correctly.

26. While President Jackson still used small state banks, he was correct about national banks. The Government should not be enslaved to any debt, nor should it enslave its people to pay debt. In my complaint I proposed the government pay off all its debt by coining without interest and debt to prevent the elimination of fiat currency and the transition to Central Bank Digital Currency which will be implemented on a larger scale July 2023. The government has the ability to pay off its debt while requiring banks to lend out what they have instead of creating money out of the fractional reserve ponzi scheme.

27. The Central banks are not loyal to the governments. 91 or more Central banks have entered an agreement Network for Greening the Financial System ("NGFS") under a carbon debt plan that allows the banks not the governments to enslave governments, entities and people based on involuntary compelled debt.<sup>4</sup> The Central banks appear to be acting in concert to enslave governments to debt and credits, ruling over them by controlling money, making money guide and God of governments. The governments should be concerned with caring for the people while protecting the people's liberties.<sup>5</sup> Instead, governments will be tempted to sacrifice liberties and the lives of the people under the lie of sustaining the world.

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<sup>4</sup> Network for Greening the Financial System (NGFS), NGFS Climate Scenarios for central banks and supervisors, 2021,

[https://www.ngfs.net/sites/default/files/media/2021/08/27/ngfs\\_climate\\_scenarios\\_phase2\\_june2021.pdf](https://www.ngfs.net/sites/default/files/media/2021/08/27/ngfs_climate_scenarios_phase2_june2021.pdf).,

<sup>5</sup> Delton Chen, Joel van der Beek and Jonathan Cloud, "Climate mitigation policy as a system solution: addressing the risk cost of carbon" Journal of Sustainable Finance & Investment, vol. 7, no.

3, 2017, <https://www.tandfonline.com/doi/abs/10.1080/20430795.2017.1314814> ; and Delton Chen, Joel

van der Beek and Jonathan Cloud, "Hypothesis for a Risk Cost of Carbon: Revising the Externalities and Ethics of Climate Change", in H. Doukas, A. Flamos and J. Lieu (eds), Understanding Risks and Uncertainties in Energy and Climate Policy, Springer Nature, 2018,

[https://rd.springer.com/chapter/10.1007/978-3-030-03152-7\\_8](https://rd.springer.com/chapter/10.1007/978-3-030-03152-7_8).



28. Banks have incentive to make people and governments worse off to gain more profit on interest in their non-central bank private banking capacity. The members of central banks include commercial banks.

29. I believe there is a plan to eliminate our government. A part of this plan seems to be to increase debt for private entities to gain control of resources and necessities to control a slave indebted people to the central banks and those the governments owe through grants or contracts. There appears to be a plan to eliminate currency after the transition to digital currency by control over all resources unrestrained by laws to prevent killing, stealing and destroying for the power, profit and positions of those who control the resources through entities. Albeit the time frame of elimination of money is not clear. In the book *2052 – A Global Forecast for the Next Forty Years is a 2012* by Jorgen Randers, *A report to the Club of Rome*, published 2012, the author predicts environmental harm, and the move towards a society based on a new spirit of the age, the same Zeitgeist movement the article I previously attached to a different affidavit discussed with the elimination of the rule of law, based on living based on satisfaction as opposed to monetary gain while eliminating individual liberties under the guise of the common good, including free speech. These lobbyists schemes, and agendas should not control the governments. The Fed Now Central Bank Digital currency will allow the Central bank to take over the government down the line. The Patriot's Act allowed the backdoor to be opened to our devices to implement this plan. If I could persuade the Courts to coin fiat currency correctly as Presidents Lincoln and Kennedy attempted to do, we may be able to safeguard the government and the rule of law. I understand this is not the case to ask you, and I must shorten my complaint, though I care about the baby boomers globally who appear to be schemed to be left with nothing to die off.



30. I do not want people to be harmed, die or go to hell based in living based on satisfaction or their desires, including desire for material gain to care for their own under a new economic model. Jesus teaches most people choose the way to hell. Many try to go to heaven thinking they are saved, but they sadly go to the hell the last day. *Matthew 7:13-15, Luke 13:23-228, Isaiah 10:22*. I believe people are misguided by their own desires, also known as sin, when their eyes are blinded from loving others.<sup>6</sup> They cannot see clearly when their minds are focused on desires and goals instead of analyzing what is loving. Their desire to extract labor, volunteers, money, contribution, help for their own or material gain from another human blurs their vision from respecting and loving that other person or people unearned required. Oppressing others and eliminating their will, a.k.a. freedom to think under the guise of the common good through government backed private or foreign partners, including the United Nations is elimination of individual rights under the lie of safeguarding them. Collective groups merely sustain the power, profit and positions of those who entice their collective uniform interests through temptations including threats, shame, praise or reward. Entities as opposed to individual judges are controlled not free to independently think.

31. I believe justice in the courts is a command by my God. I believe judges may save not only lives, but eternal lives. Courts may help the blind see, and the dumb hear. So, they do not fall into the pit and lose eternal life. *Citing Matthew 15:14, Amos 5:15, Matthew 23:23*. The Bible teaches people go to hell because they do not know. (*Hosea 4:6*, “my people are destroyed from lack of knowledge.”) They believe a lie as truth. (*2 Thessalonians 2:10–12* “and

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<sup>6</sup> *James 1:1-15* (“When tempted, no one should say, “God is tempting me.” For God cannot be tempted by evil, nor does he tempt anyone; but each person is tempted when they are dragged away by their own evil desire and enticed. Then, after desire has conceived, it gives birth to sin; and sin, when it is full-grown, gives birth to death.”)

with all unrighteous deception among those who perish, because they did not receive the love of the truth, that they might be saved. And for this reason God will send them strong delusion, that they should believe the lie, that they all may be condemned who did not believe the truth but shad pleasure in unrighteousness.”) They trust man, professionals, experts, scientists and man’s studies, professional services, technology or products blindly without using their brains, free will to critically discern what is right. (See, *Isaiah* 9:16 “For the leaders of the people have misled them. They have led them down the path of destruction.”); (Also see, *Romans* 1:25 “They exchanged the truth about God for a lie, and worshiped and served created things rather than the Creator—who is forever praised. Amen.”) Professionals who mislead the people should be corrected in court not deferred to as demi-gods above the law’s correction for mere convenience, productivity and avoidance of costs which is human sacrifice, making workers and consumers below the law’s protection. Judicial partiality towards business creates injustice based on examining the facts based on material gain or loss instead of truth.

32. Justice is a matter of truth based on the facts, not compromise by barter and exchange allowing those with something to exchange in a more favorable position to buy their will be done.

33. I have religious beliefs against not only debt, but interest on debt. God teaches people go to the fires of hell to be no more losing eternal life for charging interests on debt should they not repent. (*Ezekiel* 18:13 “He lends at interest and takes a profit. Will such a man live? He will not! Because he has done all these detestable things, he is to be put to death [meaning the second death in hell]; his blood will be on his own head.”).

34. Jesus teaches people’s sins will not be forgiven if people do not forgive others of their monetary debts. See, *Matthew* 18:21-35. God teaches forgiveness is revoked and sins once

forgiven and forgotten are remembered and will damn people to hell if they go back to them, without repentance. (See, *Proverbs* 26:11, *2 Peter* 2:21-22, “It would have been better for them not to have known the way of righteousness than to have known it and then to turn away from the holy commandment passed on to them. Of them the proverbs are true: “A dog returns to its vomit,” and, “A sow that is washed goes back to her wallowing in the mud.”); (*Ezekiel* 18:26, “If a righteous person turns from their righteousness and commits sin, they will die [in the second death] for it; because of the sin they have committed they will die [in hell as too dirty to have eternal life.”). I believe once saved always saved is a lie misguided people repeat who travel the way to hell under the mistaken belief their salvation is secure.

35. Our economic system creates money the naughty lawless Babylon way to enslave to control humanity by creating money out of enslaving people to debt with interest, not to care for humanity while safeguarding their freedom with the limit to prevent individuals from enslaving others. Governments use money based on enslaving others to pay it back plus interest to entities when they give grants and contracts. That is wrong to enslave a no longer free people, enticing them to go the way to hell by making money their master in a fixed subpar economy. This money stifles innovation based on focus on material gain, not improvement of products and services. New money is sought through private or public funds for different not better products or more speculating research. It is a Ponzi scheme to fill the pockets of the few while enslaving the many to allow debt control of people as if precious people are products to control as opposed to respect. Those who enrich themselves oppress the people by the way money is coined, distributed and taxed to serve the government officials, banks and government partners who behave like wolves eating the sheep, the people, under the guise of acting as shepherds.

36. Money is created by enslaving people to pay back what does not exist plus interest. It is scarcity based on the lie if people worked they could pay it off. The money does not exist in fiat currency but is made out of nothing by the Federal Reserve and banks through fractional reserve and other means to enslave people to pay it back with interest. It is a Ponzi scheme. The stock market is nothing but debt, which gives people skin in the game of sin of making money, interest on debt. This enslaves the people to sin and death in hell too by making interest on debt. *Ezekiel 18:13*

37. This entire system makes money God, which leads to lawlessness misleading many to hell. Jesus teaches you cannot serve two masters God and money. *Matthew 6:24*. Those who focus is on money and material gain will sacrifice liberty and human life for the bottom line. This is lawless lusts, not the impartial application of the rule of law.

38. I believe many people are misguided, enslaved to sin and death in hell by their desire for wealth. I keep myself separate by living for God while showing love to others by exposing sin in hopes people are made clean. I do not want them to die in the second death. Money is not my savior or God. People who are blinded by their desire to make money to pay their bills and provide for their own family get burnt up the last day to be no more too, for allowing the cares of other things and the desire for wealth to squeeze the truth out of them. *Matthew 13*. What this world claims justifies, Jesus teaches damns.

39. I understand how our system is corrupted misleading many to hell by making money God and guide by those who make scarcity by design to increase profit, power, position and control over people. It is a trick.

40. I believe every politician who collects donations or signatures sins and is in danger of being thrown into the fires of hell the last day. My complaint against the democrats explains my religious beliefs more fully.

41. I believe little children are taught to go the way to hell young by fundraising. They are taught to look at others with disgustingly dirty evil eyes based on what they may extract from other humans, whether labor, money, help or material gain. They are taught to have an ugly heart young, to value material gain, not to value people unearned required. They are trained to value humans based on what they get from them as products to use. It makes me so sad. So many things others praise I see as evil misleading people to harm or hell.

42. I believe other people exist because they are loved by God. When people love their own more or material gain more than other people, they are willing to sacrifice Constitutional liberties and the life or health of others to serve their own. I believe people go to hell for loving their mother and father or son or daughter more than God, by placing their own family and own community first like Satan, should they oppress, ignore and sacrifice others outside their own.

43. I believe business greed by barter or exchange is the mark of those not saved from hell if left unrestrained by love written on their hearts or the just rule of law. Those whose eyes are on convenience, productivity, avoidance of costs, and material gain with no love and required respect for their fellow humans sin. We are not supposed to hate them for harming others. We are supposed to love even our enemies by correcting them in hopes they are not doomed to destruction the last day.

44. I believe Courts may prevent those reigned by lawless lusts, not the just rule of law in their hearts based on love, to prevent them from oppressing, killing, stealing and

destroying human life or liberty for material gain. People need not contribute money and material gain to others to be worthy of life. Money is not what gives life. The desire for money by those enslaved to sin and death in hell by making money master creates busy work, poor products and services because misguided people's eyes are on profit, money, material gain, productivity, position, power and avoidance of costs.

45. I believe people, especially elected officials, sin when they ask for volunteers, money, contributions, help in the form of fundraising in collective groups, through charities or entities. I believe they go to hell for this, as it is not true charity, should they not repent. They disobey Jesus. *Matthew 6:1-4* Jesus teaches me not to have disgustingly evil hypocritical eyes by looking at other people for contributions, volunteers, or for money under the guise of performing charity yourself. Instead Jesus says, "Go, sell everything you have and give to the poor, and you will have treasure in heaven. Then come, follow me." *Mark 10:21*. Asking other people to give what you are not willing to lose is not charity, it is the creation of temptations by societal peer pressure by praise, not based on unconditional love or charity. It misleads the people to hell by teaching collective conditional conduct is unconditional love. I obviously have religious objections to organized charities and the newest type of corporations and alternative entities, beneficial corporations and entities. These violate Jesus' teachings in *Matthew 6:1-4*. I believe these new evil entities will be used to eliminate social security in the decades to come if unstopped by judges.

46. Jesus teaches we cannot serve God and money. We are to look at God as savior not as money as savior. In *Matthew 6:19-20*, Jesus teaches, "Do not store up for yourselves treasures on earth, where moth and rust destroy, and where thieves break in and steal.

But store up for yourselves treasures in heaven, where moth and rust do not destroy, and where thieves do not break in and steal.”

47. The way that money is coined and distributed misleads many to love money, convenience, productivity and avoidance of costs more than one another leading to injustice by human sacrifice of life and liberty for material gain.

48. I believe many people are misguided, enslaved to sin and death in hell. I keep myself separate by living for God while showing love to others by exposing sin in hopes people are made clean. I do not want them to die in the second death.

49. I believe correction in court can prevent condemnation in hell.

50. I believe a lot of thing people praise are good are evil and lead to damnation in hell. I believe people sin when they are blinded by their desires, including their desires for convenience, happiness or for money and basic needs to care for their own, they no longer use their brains to think things out to love God or others as self.

51. I believe partiality is a source of government corruption and injustice which should be restrained by the courts to uphold the impartial application of the rule of law in accordance with the 5<sup>th</sup> Amendment’s equal protections component.

52. I believe people sin by fundraising and by collecting signatures. It compromises public servants’ ability to impartially serve all, by the temptation to serve those who support their seats with grants or government contracts.

53. I disagree with case law holding money and material gain meets the rational basis standard for government conduct in our fixed, forced subpar economy where goods and services are made worse off by design to serve profit by oppressing the people. I think courts are wrong, especially since the people are enslaved to pay back unjust gains with interests in a fixed not free

or fair economy by the way money is coined. I think judges are blinded by how money is coined out of debt by fractional reserves, or zero reserves since 2022, to eliminate Constitutional liberties to enslave the people who make unjust gains to private and foreign partners through grants and contracts with interest. I believe lawyers have a duty to uphold the Constitution by telling judges they violate the Constitution by allowing elected officials and their private and foreign partners to enslave a no longer free people in a fixed economic system by holding money and material gain to pay bills or for the general welfare is a legitimate reason for the government's disparate selective partisan application of the law by government grants and government contracts to entities.

54. I believe the government should help individuals in need directly, unearned, required, without exploiting their need to serve entity greed. I believe individuals who give and receive government grants and government contracts sin leading to their damnation in hell by unjust gains to serve business greed should they not repent. The government partiality to those who appear to save the most money or who back their interest creates unequal unfavorable treatment towards others based on social capital, wealth and resources, arguably in violation of the 5<sup>th</sup> Amendment's Equal Protection' component in light of my disagreement with the rational basis standard while violating the 13<sup>th</sup> amendment and my First Amendment religious beliefs to pay it back. The rich do not have the smartest ideas but usually the worst most oppressive which oppress and enslave the common man to serve the bottom line. Grants and government contracts create an unequal playing field of wolves who serve lawless lusts for material gain to fund corruption not good. I am especially troubled by case law which allows favoritism in a fixed not fair or free market to serve political seats and interests.



55. The government should not have to pay any bills. The government should not be enslaved to the private entity the Federal reserve nor should the government and the people be enslaved to banks or to mere entities the government claims to owe money to through government contracts or grants. This makes money the government's master, not the desire to care for as opposed to control the people while protecting the people's free will from government backed substantial burdens. The money received by grantees and government private or foreign contractors or beneficiaries receives are based on enslaving the citizens to pay back the debt with interest in violation of the 13<sup>th</sup> Amendment and my religious beliefs against debt.

56. The government may coin correctly without debt and interest, and the government may stop colluding with private and foreign partners by ending partnerships. Independence is needed to protect the liberty of the people from oppression from the private and foreign partners who are rendered above the law since the government's backing makes them the letter of the law. Besides, there appears to be a plan to eliminate governments down the law replaced by deeming private or foreign partners above the law. If the government seeks to preserve the government and the laws that make us free, then the government must consider dissolving loyalty and partiality towards partners which eliminate the people's equal protections under the law in an unfair government backed market.

57. The US Supreme Court held in *James v. Dravo Contracting Co.*, 302 U.S. 134, 168 (1937) "The federal power to contract for supplies or services is as necessary and as fundamental as the power to borrow money. Thus it has been said, speaking of a tax upon government obligations:" Neither are necessary.

58. The federal government should not contract with private and foreign entities, but should contract with government employees to pay for their services without taxation or debt by

coining correctly. It is a lie that the government has the power to borrow money, when it has the power to create it out of nothing to care for as opposed to creating it out of debt to enslave to control the people. The government creates slavery when it agrees to debt, not freedom. Debt is against my religious belief because I choose to be a slave to God by doing what is right, not money by doing what is wrong to get as much as I can for as little without restraint in the form of love in my heart or the just rule of law. The Bible teaches the love of money is the root of every type of evil. 1 *Timothy* 6:10.

59. The artificial debt is against my religious beliefs, and makes the United States a slave to those it owes. I proposed ways to prevent the elimination of fiat currency in my complaint in hopes to prevent the schemed elimination of the government down the line.

60. The Courts have the power to deem the private bank practice of coining American money as an unlawful delegation of Congressional power in violation of Article I, Section 8, Clause 5: The Courts may also think outside the box to prevent the overthrow of government by dissolving government partnerships to prevent enslaving the people in a fixed subpar economy,

61. The other two branches may consider creating institutions without debt. They may coin interest or money to care for the people's needs including retirement, while allowing people to buy and sell by free choice, not exploitative forced choice to serve entities who bribe or buy through donations elected officials in return for supporting the official's seat or conditional platform.

62. Money may be coined without government borrowing correctly without violation the 13<sup>th</sup> Amendment or my religious beliefs that a free people should not be a slave to earn money leading to their death in hell by making money master instead of God to pay off unjust gains received through government grants and contracts. Jesus Christ teaches us do not store up

wealth. Jesus Christ teaches you cannot make God and money both master. Elected officials who make money their savior, or teach jobs, money, the economy and earnings is the savior or freedom lie. They knowingly or unknowingly sacrifice Constitutional protected freedoms and the people they are elected to serve for material gain. They do not protect people or people's freedom but enslave them for material gain. That rational basis argument that eliminating freedom and enslaving people for money will not fly on judgment day.

63. The World will not be okay if judges do not uphold the impartial rule of law and the impartial application of the rule of law by ending government contracts and grants to entities who behave as partners with the government. When the other two branches application of the law becomes partial towards partners in a forced not free economy judges should tame the law makers' and President's lawless lusts with the impartial rule of law.

64. Even if you disagree with my strongly held religious beliefs against money as guide and God, against organized charity, volunteering and fundraising, and against government-private and government -foreign partnerships based on religious grounds, you know my unique religious beliefs may grant me standing in another case if the worst happens.

65. I am heartbroken. Thank you for considering my concerns. I will place them on the back burner and focus on my case. Though I care about old people losing their savings, retirement and social security. There is another way to care for as opposed to control the people by coining correctly.

Dated 4/8/23

Respectfully submitted,

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# Exhibit 16

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF MEGHAN KELLY'S TWENTY SECOND AFFIDAVIT UPDATE

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

1. Upon information and belief there is a plan to slowly overthrow the government.

2. Creating a moratorium on home foreclosures may slow down the plan to recoup resources including land by private and foreign entities who seek to control the government only to overtake the government down the line. My former law firm makes money off of foreclosed lender owned properties which are called Real Estate Owned properties (REOs) because they have a meticulous reputation in representing lender owned buyers. So, if I rejoined my former law firm, I would make more money the worse off people are. Yet, that is terrible. I do not want people to be worse off. Money is not my God and guide. I am commanded to love people, not sacrifice them to serve monetary gain to care for my own. I would rather earn less money and care for people than make more money under the lie money is the savior to save oppressed people. I believe just laws and justice in the courts is the savior of oppressed people.

3. I believe in the courts and individual judges who independently critically think, even if you disagree with me. Without independent critically thinking people judges, none are free. We are for sale products to exploit for material gain as opposed to serve, unearned required should money, material gain, even gaining the world be the aim. I believe that elected officials, judges and even lawyers serve lawless lusts for implementing and arguing for unjust decrees, by

valuing money, convenience and avoidance of costs more than individual liberty and people. I believe people go to hell when they teach justice is a matter of barter or exchange, or compromise, which compromises evil for good instead of truth. I believe people go to hell when they teach justice is a business which makes the rich and well connected and those with something to barter with other than their souls able to buy their will be done like Satan.

4. I ran for office in 2018 on an environmental platform. Yet, I proposed ways to care for the environment and decrease pollution without burdening the backs of the common people. Unlike the green global plan I did not require the common people pay to clean up someone else's mess to increase unjust gains. I believe people serve lawless lusts leading to their damnation in hell when they enslave people to their dictates under the guise of "doing their part." Such societal, economic or physical pressures eliminates freedom by the forced will of government backed private or foreign partners which creates a foundation to eliminate the rule of law down the line to be replaced by reign by lusts, the mark of the damned which is sad.

5. It is lawless vanities reflecting the image of Satan to require the government backed foreign and private partners will be done, eliminating free will by economic, social or physical force in a fixed slave market as schemed ahead. We should have a free market with laws restraining private and foreign entities from oppressing, harming, killing, stealing and destroying people for the bottom line. Just laws to stop rewarding made to break, repair, service or replace is the solution. The alleged green products, made to disintegrate still require pollution in production and transportation of the made not to last products. Money is the problem not solution. Money for research is the problem as it creates incentive to create problems to gain more money. Money contracted or granted to private or foreign entities creates an unequal playing field in a fixed not fair economy.

6. When I ran for office in 2018, I discovered lobbyists controlled the government and chose their leaders not the people. They talked at the 38<sup>th</sup> democratic meetings, “who should we pick.” They did not allow the people to choose in fair or free but fixed elections where lobbyists chose both sides. Artesian and other entities donated to both sides, making business backers above the law by the temptation to reward those who serve elected official’s seats. That is dirty and corrupt, not a fair or free elections, but a for sale election. I strongly disagree with Citizen’s United and other recent United States Supreme Court cases, where the court purports to safeguard freedom. Yet it blindly sacrifices individual freedom to serve entities without hearts. The court is confused and misguided by mere tradition and the temptation that standardized bad judgment eases costs, convenience and productivity at the sacrifice of justice. More injustice is not fair when the outcome of law suits is not about truth, but is a matter of bater and exchange leaving the rich, well connected and the powerful above the law’s correction since they barter and buy outcomes.

7. Citizen’s United is corrupt. I believe the vote should be the only fair and equally protected means to select leaders. No money should be given to elected officials. I believe the US Supreme Court is wrong in Citizens United and other cases where they sacrifice individuals and individual liberty to serve entities without hearts who have no power to do good.

8. Entities in turn are not free but are controlled by those who entice their collective interests by reward and threat of harm. We eliminate freedom when we bow down and worship the mark of the beast, conditional conformed lusts, with no power to unconditionally love, unrestrained by just laws to prevent people from enslaving and oppressing each other through social, economic or physical pressures like devils.

9. The Supreme Court has been wrong in a series of decisions, but I am disappointed in the Third Circuit who was previously in the right before the US Supreme Court overturned cases in the termination of the postal worker who was fired for practicing religious beliefs concerning the Sabbath. It is even more important to protect the US postal worker's religious belief to worship on the sabbath without government US postage pressure to forgo his religious belief to buy and sell as an employee. Why? There are political preacher attacks against Catholics and officials associating as Catholic who think people like me, the president and Catholic supreme court judges are naughty because the church changed the sabbath day. Though I usually go on Saturdays when I go. Some loud political preachers with 1000s of followers think we Catholics are naughty antichrist. Ask yourself am I naughty Do I love you as a human being, or would I sacrifice you to serve my own which is naughty. Human sacrifice is always wrong. There are lobbyists who distort religion to serve material gain. These misguided government partners serve greed not people by seeking material gain.

10. Freedoms are not for sale, in exchange for professional licenses. When the courts make business the law, by making professionals the law, by self-regulating, money, not freedom, or the people, is protected. Individuals and individual liberty are instead sacrificed under the lie money grants freedom when it creates slavery by how it is coined. There is scarcity by design. The problem is not there are too few workers funding social security and tax coffers for pensions. The system is rigged.

11. I disagree with the Supreme Court's decisions in *Masterpiece Cakeshop, Ltd. v. Colo. Civil Rights Comm'n*, 138 S. Ct. 1719, 1721 (2018); which is distinguished from my case in that I am punished for exercising my private individual religious belief, private religious-speech, in my private-personal religious petitions. Whereas a business receiving a government



license to buy and sell in *Masterpiece Cakeshop* was permitted to choose who is worthy of buying and selling, based on relationship on religious grounds.

12. I understand there may be 13<sup>th</sup> Amendment arguments against compelled servitude. And yet, business is not freedom. A license is freely accepted and the private holder must not disparately treat customers based on the exercise of the customer's free will to believe and live differently than the merchant. Again my case, is different in that I am persecuted by the state based on my exercise of fundamental rights, my private First Amendment right to petition, my private First Amendment right to religious belief, exercise of belief, My First Amendment right to be free from the government established forced religion, my private-First Amendment right to association, even as a Jesus-lawyer, my First Amendment right to speech and other rights, Equal protection, procedural due process, right to self-represent, call witnesses and so on. I am not seeking government authority to disparately treat consumers as unworthy to serve based on my disagreement of their religious or secular belief.

13. Some religions include involuntary servitude, forced caste systems and human sacrifice. If the government grants a license to private professionals to use religion to oppress, and blackball others through licensed or government backed businesses or not for profits, we are not free people, but are bartered for under a fixed government backed economy which protects discrimination not based on quality of goods and services but partiality.

14. Similarly, I believe the Supreme Court is misguided by money saved or gained by entities who under the guise of freedom of religion, control people, forcing their religious views, by business greed again in *Little Sisters of the Poor Saints Peter & Paul Home v. Pennsylvania*, 140 S. Ct. 2367, 207 L. Ed. 2d 819 (2020). Here, "The Supreme Court... held that ACA authorized Health Resources and Services Administration (HRSA) to exempt or accommodate

employers' religious or moral objections to providing no-cost contraceptive coverage." This arguably saves the employer more money in insurance costs, at the exchange of losing coverage for their employees, bartering away, selling other people's free choice, their souls, or freedoms, for the bottom line by forced choice. It is my religious belief this is based on the mark of the beast, business greed, under the guise of good. I see it as enslaving others to bend to the employer's religious will, diminishing their free will, by economic force, potentially losing a job. The Supreme Court is bartering away people's freedoms to artificial entities without hearts, businesses, not for profits and charities, without the ability to reflect the image of God, by unconditional love. Entities run on cash or conditional labor with no ability to unconditional love by their nature which is collective, contingent conformity. Jesus teaches you cannot serve God and Money. I choose God.

15. Money is not speech either. It is bought not free, not freedom of speech. If buying and bartering for a voice is free speech, only those with money power and connections, have the freedom to purchase a louder voice to be heard, in violation of the Equal protections clause component of the 5<sup>th</sup> Amendment applicable to the federal government by disparate treatment based on poverty and wealth. Wealth does not make one more important or more worthy of being heard. Looking at the bottom line creates unequal treatment and mistreatment of the poor. Do you serve people or greed, which I believe is lawlessness.

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

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

18. I believe lawyers, even lawyers labeled disabled inactive lawyers like me have a duty to uphold the Constitution by telling judges their rulings violate the Constitution, even if the rulings are based on misguided holdings 100 plus years old.

19. With that said, I believe the Courts have been wrong for about 100 years with regards to holding government pay, pensions and social security are not protected under the contract clause.

20. I also believe the courts are wrong by protecting colluding private partners in a fixed not fair unequal economic system. Government contractors should be deemed government agents unprotected by the contracts clause.

21. The money the government uses to pay entities is made by enslaving not serving the people by requiring they work to pay back the federal reserve with interest with money that does not exist. It is a Ponzi scheme requiring the citizens become slaves in a fixed not free economy. The proclamation that all men are created free and the free exercise of liberties is

violated by the manner money is coined electronically or otherwise by the private entity the Federal reserve and the banks.

22. In June 2023 a debt default may occur.

23. I desire to persuade our US Attorney General to sue President Biden to change case law and to protect the rule of law, by protecting the people who govern as government employees by protecting their pay, pensions and social security. Case law shows social security, pensions and government pay are not protected and may be wiped out.

24. Should government pay, social security and pensions stop payment this June, I want US Attorney General David Weiss or US Attorney General to sue the government under a contract clause theory to change 100s of years of bad law to prevent the schemed overthrow of our government by eliminating people judges and others. The schemed overthrow is designed by temptations. They entice the government employees to wrongly enslave the people by increasing taxes the people cannot pay. The taxes will cause foreclosures and bankruptcies decreasing tax revenue in bulk despite o and because of the tax increases. Our leaders refuse to think things out by giving into temptations to serve their immediate gratification at the cost of harming the people down the line.

25. I do not want old people to go to hell. I believe the most important time of your life that determines eternity is the day of your death. In Ecclesiastes the Bible teaches the day of your death is more important than the day of your birth.

26. I believe people go to hell for trusting in money as God and savior. If old people become bitter at losing retirement and pensions or I the blame others increasing oppression by requiring others to work to care for them by force, they will go to hell, which is sad. Those who trust in money as savior get thrown into the fire as unworthy of eternal life at the last day,

regardless of whether it is through charities or work. I do not want old people to be harmed, die or be doomed to hell because they are in despair and left to die in want because the case law does not protect government pay, pensions or social security under the contracts clause.

27. The case law serves lawless lusts, making the mark o the damned the law productivity, material gain, avoidance of costs and material gain at the exchange of sacrificing souls like Satan.

28. I pray US Attorney General David Weiss or Merrick Garland bravely confronts the courts to say they were wrong to correct them to save government pat, pensions and social security of even federal judges to care for the people.

29. I sent opposing counsel and US Attorney General David Weiss an email with research on this topic the law librarian kindly sent me. (Email attached hereto without the research attached). I hope David Weiss would be the hero we need to be a life saver and eternal life saver, not with money or might, but with his mind to persuade the courts to do justice, not injustice guaranteed if no one asks.

30. I am so concerned. Congress may be crying wolf to feign the hero or to get their will be done by eliminating freedom by government control through barter or exchange. One day the wolves will come. I pray the Courts act as god shepherds caring for their flock, not sacrificing them to serve a pack who is schemed to turn on itself at some unknown time.

31. Now may be an opportunity or the US Attorney General to change case law to prevent harm to the people and the dismantling of the government by elimination of control to be controlled by those who control the money which is the global money changer and the central banks. There are plans to eliminate the government to be bank owned not free people.

Thank you for your time.

Dated 4/17/23

Respectfully submitted,

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# Exhibit 17

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF MEGHAN KELLY'S TWENTY SECOND AFFIDAVIT UPDATE

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

1. The US Supreme Court has granted my petition by dismissing my appeal.

(Exhibit 1)

2. I asked the emergency clerk of the US Supreme Court Robert Meek to please stop deleting my electronic receipt of filings by deleting the documents on the efilings side. So, I am grateful he deferred to my request by not deleting my Different application on the efilings side.

(Exhibit 2) I appreciate his efforts to figure out why my filings were deleted on the efilings side not merely the docket side. I lost other receipts and confirmations of other certain documents submitted. That was weird, and may have been hacks. On a side note, I am concerned about preventing hacks, not allowing others to profit from them to maintain hacks that the back door to our devices allow in order to implement Private Central Bank Digital Currency. I believe the Patriot's Act's purposes was to open the back doors to our electronic devices to allow the digital slave system which will be slowly implemented through Central Bank Digital currencies if the courts do not stop it.

3. I am concerned about the US Supreme Court case *Gerald E. Groff v. Louis DeJoy, Postmaster General*, No. 22-174 . It is even more important for the US Supreme Court to protect free exercise of religious belief by protecting the religious belief of someone who



believes differently than the court to uphold the integrity and impartiality of the court. The Court must uphold and show the Constitutional limits safeguarding freedom applies to all, not some, not merely the religious or secular beliefs endorsed by the government and government backed private partners I see as government agents.

4. Do I agree with the postal workers belief concerning the Sabbath? No, but I would defend his right to believe differently than I do to the end. Love cares for and does not control.<sup>7</sup> We must protect those who disagree with us or none are free. All are forced to worship by the government backed by private partners accepted or authorized belief. I hope the United States Supreme court protects the Amazon contracted postal man's religious belief without government authorized compelled economic pressure eliminating his right to buy and sell but for his religious exercise. This case is big. The decision will show us where the US Supreme Court members' hearts are 1. in upholding the greatest Constitutional laws to protect freedom and individuals or, 2. sacrificing individuals to serve business greed to entities who eliminate Fundamental rights by government backing or partnerships. I hope the Court helps the former postal contracted employee and does not sacrifice a person or their liberty to serve money.

5. There appears to be a long line of cases holding federal government pay, pensions and social security are not protected under the contract clause.

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<sup>7</sup> *Colossians* 2:16, ("Therefore do not let anyone judge you by what you eat or drink, or with regard to a religious festival, a New Moon celebration or a **Sabbath day**."); *Mark* 2:23-27, ("23 One Sabbath Jesus was going through the grainfields, and as his disciples walked along, they began to pick some heads of grain. 24 The Pharisees said to him, "Look, why are they doing what is unlawful on the Sabbath?" 25 He answered, "Have you never read what David did when he and his companions were hungry and in need? 26 In the days of Abiathar the high priest, he entered the house of God and ate the consecrated bread, which is lawful only for priests to eat. And he also gave some to his companions." 27 Then he said to them, "The **Sabbath** was made for man, not man for the **Sabbath**.")

6. I believe there is a plan to slowly overthrow the government by private control of the government. Regulating the courts by ethics will make it easier to argue imperfect judges who do not conform to the fickle partial desires of the regulators are less fit to judge than automation. Allowing ethics rules will make it easier to eliminate judges who may stop the overthrow of the United States.

7. I oppose regulating the US Supreme Court or ending life time terms to protect us. Members of the Courts should not be tempted by the partial interests of the ever-changing fickle fads of the masses, lobbyists, regulators or law makers such regulations would require, instead of the impartial rule of law. Judges should not be concerned with their appearance, but in truth to administer justice. (See, John 7:24 “Stop judging by mere appearances, but instead judge correctly”).

8. We are all in danger if the US Supreme Court gives into temptation to allow regulations that will only hinder and harm it and the American people by tempters who behave like devils by creating pressure to bend the will of the court to their dictates. Regulations will create a partial court mandating injustice by sacrificing impartial application of the Constitutional law to adhere to regulations as more important to protect selfish partial pay, position under the lie of impartiality. The threats against the federal courts to exceed Constitutional checks is an attack on the rule of law that limits private entities and government agents within the other two branches.

9. Ex post facto laws should not be enforceable against the Supreme Court or federal judges, either. Yet, argument may be had that the Court may waive the Constitutional defense. Moreover, disciplinary proceedings allows evidence of any conduct to be fair game to remove lawyers and judges despite the Ex post facto nature. I strongly oppose laws by unelected

bureaucrats or self-regulating controlling a no longer free United States Supreme Court. I believe the regulations will be used to mandate partiality and injustice towards mere regulations under the guise of fairness by taking away the Court's power to impartially uphold the freedoms of all under the Constitutional law

10. I see the attacks against the justices. It is okay to criticize. It is not okay to violate the Constitutional limits the other two branches have to place a check on the judiciary, 1. Cases and controversies, and 2. Impeachment.

11. Once you create standards by waiving Constitutional limits, you allow for automation to be used that can only think inside the box of standards placed in algorithms unlike people judges . People judges are needed to uphold the Constitution by granting accommodations of rigged standards in statutes and laws to people (as opposed to entities) to protect their Constitutional liberties. We have no freedom without people judges. All are reigned or sacrificed to the mob's reign of lusts through the popular vote, unrestrained by the just rule of Constitutional law as applied to people.

12. There is an attack on the courts to slowly eliminate the rule of law to allow entities to be above the law unrestrained by just laws needed to prevent private and foreign entities from enslaving, killing, stealing or destroying human health or life to serve material gain.

13. I have been consistent in warning this Court of an agenda to eliminate people lawyers, people judges, court staff under the lie sameness and compelled equality is equal protection under the law, when it is elimination of individual liberty by compelled conformity to serve business greed, not good.

14. I am horrified the current case law allows the elimination of federal pay, federal pensions and social security unrestrained by the contract's clause. Eliminating payment of

federal judges is another way court's may be regulating to conform to the pressures of partial entities instead of the impartial application of the rule of law.

15. The Contract's clause should protect people, not government agents who receive government contracts or grants to perform business, which is not freedom. Such money violates the 13<sup>th</sup> Amendment by enslaving the people to pay such unjust gains to mere entities with interest in the unlawful way money is coined and is schemed to be coined digitally until the plans to eliminate currency by control of resources, even people as products is implemented if not stopped. It is lawless lusts unrestrained by law. We need the courts to save us from lawlessness veiled as freedom, when it is enslavement to sin, and I believe death in hell.

16. The case law is clear, federal judges pay, pensions and paychecks are not protected. They are sacrificed to entities who serve greed not good. Case laws appear to protect government contractors, entities performing business, not freedom of the people. It is enslavement. The case law must change.

17. I sent my little cousins Ike and Tim an email hoping they would bring a suit in DC should everyone's savings, government pensions, government pay, and social security be wiped out against the government under a Rule 23 law suit. They work as attorneys in DC at Skadden and Sidley Austin. They will likely not do anything. I haven't spoken to either of my cousins in years. Yet, if the worst comes they may think about it with knowledge we are not stuck. We may ask the courts to save us. (Exhibit 3)

18. I sent US Attorney General David Weiss an email. (Exhibit 4). Since the US Attorney Generals may sue President Trump a US Attorney General may also screen Attorney Generals to allow one US AG to sue President Biden or Janet Yellen to safeguard federal pay, federal pensions and social security by changing years of bad case law. The Supreme Court

must protect government pay, pensions and social security under the contracts clause by overturning years of prior decisions or may lose their own pay and government position. The US AG may sue on behalf of self, as a federal employee or possibly on behalf of the people.

19. The US Attorney General may have a short window of time to try to save government pay, pensions and social security overturning a long history of denying the right to them under contracts clause.

20. This June 2023 we may hit the debt ceiling. US Attorney General David Weiss's pay may be temporally halted. Then in July the Central Bank digital currency may be rolled out under the feign of saving the people when it is an anti-hero.

21. I asked David Weiss to please consider suing Biden if there is a default on your and his federal pay, social security and pensions. Maybe I should have considered asking him to sue Janet Yellen instead since she was the former Federal Chair. Additionally, it would be good for the courts to learn more on how money is created out of nothingness to enslave not serve the people to enrich private and foreign government partners by suing Janet Yellen instead.

22. I hope he considers a writ of mandamus against Secretary Janet Yellen pursuant 31 U.S.C. § 5112 (k) to coin money without debt or interest to pay off all debts to prevent the elimination of fiat currency and the dollar, replaced by an electronic currency that will eliminate freedoms with use down the line, and to guarantee pay, pensions and social security under the contract's clause.

23. I believe your pay, pensions, social security and savings will not exist down the line. You or other judges on the courts may prevent that. Caring for you cares for others and may prevent schemes to overthrow these United States down the line.

24. There may be a short window of time for David Weiss to get a TRO from to enjoin Janet Yellen from stopping federal pay on a contracts clause theory which would change 100 plus years of bad case law.

25. I am sure he could think of another theory, but government employees are not protected unless the case law is overturned. Without government employees there is no government to serve or uphold the law, just entities through automation that exploit people as products under the lie of saving the world only to profit off of destroying it.

26. I asked for help from David Weiss and others. I tried to prevent economic pressure and societal pressure upon the courts used to bend its free will to the forced will of those who will continue to attack people judges to control a no longer impartial court should the courts give into temptation to allow for regulations.

27. It is up to the courts, should someone with standing ask the courts to save the courts. Finding someone with standing to save the rule of law is the hard part, especially if I am thrown away, left unemployable to be left to die of want since the courts indicate I am not permitted to buy and sell as a lawyer.

28. The case law is against caring for your government pay, pensions and social security. The case law does not serve the country but makes it for sale to private and foreign partners to be bank owned not free under the new economic agenda.

29. I am concerned Central Bank Digital Currency will control a no longer free court if pay, pensions, savings and social security are wiped out unless the courts prevent partial control over its members by the private entity.

30. I am emotional and physically worn out. It is upsetting to be sued based on my religious beliefs. My family is also upset with me for causing an economic strain. I am unable to work at my former law firm until I overturn the Delaware Order.

31. I am notifying this Court my phone has been cut off, and housing is no longer secure. I am not okay. I am not sure how I will be able to research.

32. My family is rather bitter towards me since I am sued too. They are embarrassed I am sued for my faith in Jesus and my licenses. I am walking on thin ice as my family visits. I am in tears. These lawsuits for my licenses reasonably caused embarrassment, hardship and economic and physical harm upon me, and hardship towards my family too.

33. I realize, I may have actually received less money than I believed. It is more like 200 a month as opposed to 600, but my mother just took away 200 she just gave me.

34. I hope the court helps me by rendering justice, not throwing me away showing the world the poor and those with diverse religious beliefs which do not conform to the mob or majorities are unworthy of freedom.

Thank you for your time.

Dated 4/18/23

Respectfully submitted,

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# Exhibit 18



UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF MEGHAN KELLY'S 37th AFFIDAVIT UPDATE

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

1. I am in tears. I think I forgot to name another Delaware lawyer in my PA US Supreme Court appeal.
2. I think I may have forgotten to name Richard Abbott, Esquire in the appeal I filed with the US Supreme Court on Tuesday. I wanted to use this attorney as an example of the Delaware Supreme Court and Defendants violations of the Equal Protections clause to extend the Constitutional arguments against reciprocal and collateral application of discipline, based on selective disparate treatment and favoritism. I am sorry if I failed to hold the government within the purview of the Constitutional limits to protect him.
3. I am in tears. I petitioned the DE Supreme Court concerning its own misconduct per the attached letter.
4. Claimants and the other two branches must be afforded the opportunity to correct the judiciary within the purview of the Constitution including cases and controversies like my case, and in the case of Richard Abbott.
5. Otherwise, judges are above the law, and Americans are below the Constitutional law's protection by government compelled waiver to buy and sell through licensure, or under the new economic model which creates a far worse form of government backed private slavery. The

new economic model will eliminate the rule of law and the courts down the law, if the courts do not stop it.

6. I let God down for not preventing injustice by standing up for Richard Abbott, not as an attorney, but as a Christian in my own appeal of the PA Order.

7. I may take time today to mow the lawn and cry a bit at the loss of liberty to another human by the partial whims of a misguided Delaware Supreme Court. The state court sacrifices individual liberties and life for marketing business, its own vain appearance. Jesus Christ teaches me to judge correctly not based on appearance, to guide those misguided by sin, lawless lusts, desires for position, profit, power at the cost of sacrificing humans. John 7:24. Humans are not the states to bargain with, buy or sell or sacrifice. Freedom is not a bartered for exchange. Freedom is not for sale for business. Money is not freedom, to be controlled not free by those who unjustly coin or control it. There is no social contract under which Americans must sell their souls to be damned to hell for money or necessities mammon. Matthew 6:24. There is no meeting of the minds upon the people. The contract is only by government servants and government workers who agree to the limits of the Constitution. The laws are forced by threat of penalty upon the people. There is much talk about a new social contract, contracting the souls of others like devils ruling over others by temptations, also known as scientific conditioning. Souls of people are free, not for sale products for the governments to barter for favor to private foreign and private partners. The partners exploit people for profit and power which eliminates freedom by government backed compelled slavery through disparate treatment in a fixed not free economy through government contracts, treaties, delegation of power or backing. There is an aim to eliminate the government to eliminate the rule of law which restrains the government partners conduct down the line.

8. The world is in great peril, and needs the courts to save us, not condemn us for petitioning for help.

Thank you for your time.

Respectfully submitted,

Dated 5/31/23

Meghan M. Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)  
(302) 493-6693, Not acting as a lawyer

# Exhibit 19

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF MEGHAN KELLY'S FIFTEENTH AFFIDAVIT UPDATE

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

1. The docket for the US Supreme Court that went missing reappeared on March 9, 2023, later March 9, 2023 reappeared.

2. My exhibits to the Emergency Motion to Expedite submitted March 3, 2023 on the docket disappeared.

3. I filed a letter to place them back on the docket, submitted March 10, 2023. Today, I called efilng and asked them to put it back on. They directed me to talk with Robert Meek. Robert Meek kindly called me, and told me to talk with Daniel Bickle.

4. The March 6 and 7 Motions for interim stay, and the letter related to the docket were rejected.

5. Unlike most other rejected pleadings, the receipts are noted as missing items on the efilng side, as Exhibit A. The only other document I noticed that went missing on the efilng side was a Rule 39 and 43 motion for a different US Supreme court matter. (Exhibit B)

6. Other rejected motions were merely removed as attachments to the docket. They were not removed from the efilings system as proof of service and receipt of electronically filed. (Exhibit C)

7. On March 14, 2023, I showed the law librarian proof that other rejected documents were not removed from the efilings system to remove their receipt like the latest rejected documents strangely went missing.

8. I am worried about hacks. My selectively disappearing docket and disappearing efiled receipt of rejected items is weird and concerning. This is reason why we need people staff at the courts for computer glitches and fixes.

9. I filed a different application per the court's initial suggestion, not latest suggestion. I also filed a reapplication by writing a letter per USSC Law Clerk Daniel Bickle's suggestion to the Honorable Justice Ketanji Brown Jackson. The rule says I should file 10 copies, but Daniel said I only had to file a letter. I do not know whether the Court will accept the attached letter, given I relied on the staff, not the rule. (Exhibit D). Robert Meek said he would accept it without the copies of the application. I mailed it out on March 13, and as of March 20, a week later, the court did not confirm receipt.

10. Since other documents were rejected, including a mere letter the staff suggested, I am not certain relying on the staff's kind suggestions is the same as the Clerk's acceptance.

11. The staff told me not to file a motion for reargument within the 25 days allotted under Supreme Court Rule 44.

12. I was panicking. I learned my lesson to rely on the rules not the staff. I sought to file it during the deadline relying on the rules not the staff, but I was too late to file within the deadline, due March 17, 2023. My printer was too slow.

13. However, I thought I saw another way to get new orders and information before the Court. I have to introduce new information on why emergency relief must be considered.

14. The Third Circuit indirectly denied my motion to move the conference date, by issuing a different notice with the same date on Friday with the April 11, 2023 date, by responding to my attached Motion to dispense of the need for a hearing. Meaning my motion to prevent the issue from becoming potentially moot was indirectly denied.

15. I strongly disagree with case law in the footnote holding motions not addressed are denied.<sup>8</sup> I think the finding that unaddressed motions are denied yet appealable is unjust. It

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<sup>8</sup> The Third Circuit in *United States v. Claxton*, 766 F.3d 280, 291 (3d Cir. 2014) reasoned, “... we are guided by decisions of several of our sister courts of appeals that have treated a district court's failure to rule on an outstanding motion as an implicit denial of that motion. *See e.g., United States v. Jasso*, 634 F.3d 305, 307 n. 2 (5th Cir.2011) (treating a district court's failure to rule on a motion for reconsideration as an implicit denial); *United States v. Depew*, 210 F.3d 1061, 1065 (9th Cir.2000) (treating a district court's failure to rule on a motion for employment of an expert witness as an implicit denial). In *Tollett v. City of Kemah*, the Fifth Circuit addressed a new trial motion that remained outstanding on the district court's docket following the entry of the final judgment in that case. 285 F.3d 357, 370 n. \* (5th Cir.2002). In concluding that it would address the motion on appeal, the court emphasized that “[d]espite the district court's failure to rule, neither side subsequently requested that it do so.” *Id.* (emphasis in original). Likewise in this case, the entry of the Judgment and Commitment order following Claxton's sentencing constituted “the entry of a final judgment or of an order inconsistent with the granting of the relief sought by the motion [for a new trial].” *Norman v. Apache Corp.*, 19 F.3d 1017, 1021 (5th Cir.1994). Neither party raised this issue before the District Court and we will treat Claxton's motions as having been implicitly denied and consider them on the merits.”

In *Zirinsky v. Zirinsky*, 87 Conn. App. 257, 265-66 (Conn. App. Ct. 2005), The Court rationale,

should be clear error for a Court to ignore motions by failing to rule on them. The case law allows judges to violate claimants due process opportunity to be heard. Even though claimants may plead on appeal it was merely denied, it may have been denied because judges do not care to serve all claimants with an equal hand in violation of the First Amendment right to petition, and the 5<sup>th</sup> Amendment's equal protection component. This was shockingly upsetting to me. Judges may pick and choose who is worthy to be heard, without any remedy other than allowing claimants to appeal to be remanded back to the same judge who may not read their pleadings. I believe this case law should be reversed. Nevertheless, I still have an appealable or a new reason why the US Supreme Court just address my Petition or give an interim stay to prevent the deprivation of the First Amendment right to petition and the 5<sup>th</sup> Amendment Due Process opportunity to be heard on appeal. On March 17, 2023 the Court issued a new notice of a conference date, while denied my Motion to reschedule the Conference date so as not to deprive me of an opportunity to be heard on appeal to the US Supreme Court.

16. In *Ritter v. Migliori*, No. 21A772, and Number 22-3, I saw that the United States Court uploaded a letter with attached additional new Court document(s) to be considered for an application to Justice Alito on why a stay was needed. The letter for this emergency was

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*"Ahneman v. Ahneman*, supra, 243 Conn. 479. The court further stated: "The trial court's decision not to consider the defendant's motions was the functional equivalent of a denial of those motions. Like a formal denial, the effect of the court's decision refusing to consider the defendant's motions during the pendency of the appeal was to foreclose the possibility of relief from the court on those issues, unless and until the resolution of the appeal required further proceedings. Indeed, the refusal to consider a motion is more deserving of appellate review than a formal denial, because the defendant not only has been denied relief; she has been denied the opportunity even to persuade the trial court that she is entitled to that relief." *Id.*, 480.



addressed appropriately to the Emergency Clerk Robert Meek while copying the Clerk of Court. This letter was accepted by the Court and docketed. (Exhibit E)

17. So, a letter by me with any new or additional pleadings or orders below which materially affect the application should also similarly be accepted by the court with pleadings attached thereto to prevent unequal application of the law with regards to access to the courts in contravention of the 1st and 5th Amendment's Equal Protection's component. It appears this is a way new and additional documents that are material to the case have been docketed before the US Supreme Court before.

18. I am trying to act fast, so my rights are not waived. I am acting in good faith. I do not want to be compelled to withdraw my complaint due to lapse of time deeming it moot.

19. Sadly, on March 20, 2023 Robert Meek called me back, and indicated he would not accept a similar situated letter since it was not contained in the initial application with new application to Justice Jackson. I do not know if this rejection would be proper. This is confusing. Robert Meek also indicated he would reject my different application. Today is full of bad news.

20. There were other complications I emailed Robert Meek, opposing counsel, efilng and David Weiss attached hereto, including the fact the word "emergency" was removed from my Emergency pleading to expedite the case, which will prejudice me should it be considered a mere motion, not an emergency motion. See the attached emails. Robert Meek indicated it was deemed a motion not an emergency application. So, I am prejudiced. This is the worst.

21. In addition my exhibits were removed from the March 3, 2023 pleading to expedite the case. While the Supreme Court Rules indicate the Court would only upload orders

below, will upload pro se claimants' filings who do not efile to the efilings system, going out of the way to remove material evidence incorporated into the pleadings that were previously uploaded on the system is prejudicial to me denying me an opportunity to be heard in full.

22. Robert Meek indicated the disappearing docket issues were a technical issue. So, I merely seek to get it fixed to prevent a partial, prejudicial review. Id. Robert Meek directed me to talk with Daniel Bickle about this, not him.

23. With regards to additional harm, my mom's best friend Shelly Chamberlain, Delaware Speaker of the House Pete Schwartzkopf's sister in law, said I looked anorexic skinny, in a loving way. She was worried about me months ago. So, like a knucklehead sinning against God for feeling ugly, I gained fat, not necessarily weight by eating too much without time to work out. It made me uglier and rounder not more attractive.

23. I was surprised Speaker of the House Pete did not help me when I ran for office. He was running on his own ticket with strange backlash from the upper Delaware lobbyists who sought to control members of the House as puppets. I have known him since I was a little girl, sharing thanksgivings with his sister-in-law, and at times him, and other holidays over three decades. It just surprised me how he dissociated himself from me, when I ran for office.

24. I also got the attached notification last week concerning PA placement on disability, which embarrassed me before my lawyer and law school friends.

25. I also wanted to alert the Court that my lawyer relatives are not helping me because they are not allowed to help me. It is not that they do not love me. My Cousin Ikey Adams partner of Sidney Austin and little Cousin, Tim Mastrogiacomo of Skadden in DC, are not licensed to practice law before your court.

26. Unjust laws protect people and their free will. Unjust laws serve lawless lusts like productivity, money and material gain to control people by sacrificing a free people to a forced economic will which creates worse products and services by lack of criticism and forced standardization. I believe those who enact or enforce unjust decrees or government backed policies are in danger of damnation in hell. When God says “Woe to you,” I sit up.<sup>9</sup> I hear damned to hell are you unless you unhardened your heads and unhardened your hearts and clean your dirty mind, dirty hands and dirty heart. I believe people go to hell for blindly doing what they are trained to do, told to do, required to do without using their free will to think things out to determine what is right, love to overcome wicked lusts including convenience or productivity at the cost of oppressing a slave people in a fixed, not free economy.

27. In the article attached to the Motion without an exhibit page, the important part was cut off which lobbyist’s stated,

“How can the use of Laws be eliminated?

Today we try to **control human behavior** by enacting laws or signing treaties without changing the physical conditions responsible for aberrant behavior. When Earth’s resources are seen as the common heritage of all people, **irrelevant laws** and social contracts will vanish.

In a resource-based economy, social responsibility would not be a function of artificial laws or force. Safeguards against abuse could be designed into the environment. An example of this is the proposed design of cities where people have free access to resources without debt. This would eliminate theft. Such measures are not a matter of passing and enforcing laws to prevent and punish abuse. Rather, they are a means of designing the flaws out of any social venture, thus eliminating the need for many laws.

We are proposing doing away with the systems that cause corruption and human suffering in the first place. In a city with safe, clean, mass transportation, we do not need police to monitor drivers’ speed, behavior at stop signs, or proper papers.

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<sup>9</sup> *Isaiah* 10:1-3 “Woe to those who make unjust laws, to those who issue oppressive decrees, to deprive the poor of their rights and withhold justice from the oppressed of my people, making widows their prey and robbing the fatherless.”

Other examples are the air and the water. Although both are necessary to our well-being and survival, there are no laws regulating how many breaths are taken per hour because we have such abundance at this time. No one monitors a gushing spring to see how much water is taken from it, although fresh water is absolutely necessary for the support of life. If it is abundant, no one monitors it.

I must emphasize that this approach to global governance has nothing in common with the present aims of an elite few to form a world government with themselves at the helm, and with the vast majority subservient to them. This newer vision of globalization empowers every person on the planet to be all they can be, without living in abject subjugation to a corporate governing body.

A society with human concern “designs out” laws and proclamations by making all things available to all people, regardless of race, color, or creed. When governments make laws, we are led to believe that these laws are made to enhance people’s lives. In truth, laws are byproducts of insufficiency.

The question is, “can we grow beyond thinking that “someone” has to make decisions for us?”

A better understanding of natural law involves human’s relationship to the environment, which supports all life. All of nature is subservient to natural law. Natural law cannot be violated without serious consequences to individuals or societies. Natural laws dominate all living systems. For example, without water, sun, or nutrients, plants and animals die.

An environment of scarcity, hunger, and poverty is a threat to everyone.” 28. The lobbyist’s proposal of eliminating laws will have the affect of tyrannical reign by those who control the technology and other resources, unrestrained from oppressing, harming, killing or destroying those who do not bend to their will by the just rule of law. This creates oppression and injustice, not freedom or the common good.

29. Look at how bad the world is. People are proposing killing people through death with dignity acts under the lie of good to allegedly put the sick out of their misery by killing them. In reality killing sick, old people who cost a lot in convenience and saving of costs by those who value material gain more than people. This is not protecting life, but sacrificing it to gain the world. Look at people saying the problem is there are too many people for the world to sustain, when the people are the treasure not to be sacrificed to gain the world.

29. On the matter of injustice, I listened to an old video of Justice Kavanaugh on youtube concerning the fact there are many regulations as opposed to merely statutes. It appears he changed my mind on deregulations. It clicked in my hard head that it was unelected bureaucrats, above a check to their law-making authorities in terms of the vote that drafted regulations. I believe congress must sit in their seats to draft rules and laws not unelected partial bureaucrats above one constitutional check to their power, the vote.

30. Deregulation is not lawlessness, Congress's refusal to draft statutes and rules without delegating their power to others creates lawlessness based on lusts, partial desires.

31. I am humbled as I learn. While I disagree with Justice Kavanaugh's book, "A Republic, if you can keep it," because I believe the courts give us a democracy in our democratic-republic, not a republic, I thank him or using his words to make me a little less dumb. That diverse sharing of criticism helps us learn. People should be free to share bad ideas too. How can they learn their ideas need improvement if they cannot share them.

32. I believe each one of our freedoms will be slowly eliminated if the courts do not safeguard freedom. I hope the court safeguards my freedoms in order to safeguard the freedom of all.

Thank you for allowing me to file this 14<sup>th</sup> affidavit update.

Dated: March 20, 2023,

Respectfully submitted,

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

# Exhibit C

Aug 24

Boobytrap 😞

OFFICE OF THE CLERK

PATRICIA S. DODSZUWEIT

CLERK



UNITED STATES COURT OF APPEALS

FOR THE THIRD CIRCUIT  
21400 UNITED STATES COURTHOUSE  
601 MARKET STREET

PHILADELPHIA, PA 19106-1790

Website: [www.ca3.uscourts.gov](http://www.ca3.uscourts.gov)

TELEPHONE

215-597-2995

August 24, 2023

Meghan M. Kelly  
34012 Shawnee Drive  
Dagsboro, DE 19939

RE: Meghan Kelly

Case Number: 23-2485

District Court Case Number: 2-22-mc-00045

PACER account holders are required to promptly inform the PACER Service Center of any contact information changes. In order to not delay providing notice to attorneys or pro se public filers, your information, including address, phone number and/or email address, may have been updated in the Third Circuit database. Changes at the local level will not be reflected at PACER. Public filers are encouraged to review their information on file with PACER and update if necessary.

To All Parties:

Attorneys are required to file all documents electronically through the Court's Electronic Case Filing System. See 3d Cir. L.A.R. 113 and the Court's website at [www.ca3.uscourts.gov/cmecf-case-managementelectronic-case-files](http://www.ca3.uscourts.gov/cmecf-case-managementelectronic-case-files).

Enclosed is case opening information regarding the above-captioned appeal filed by **Meghan M. Kelly**, docketed at No. 23-2485. All inquiries should be directed to your Case Manager in writing or by calling the Clerk's Office at 215-597-2995. This Court's rules, forms, and case information are available on our website at <http://www.ca3.uscourts.gov>.

**Please note:** If any party has filed one of the motions listed in Fed.R.App.P 4(a)(4) after the notice of appeal has been filed, that party must immediately inform the Clerk of the Court of Appeals in writing of the date and type of motion that was filed. The case in the court of appeals will not be stayed absent such notification.

*Requiring expanded  
resources for amended  
notice filed on the  
record tried to avert  
to prevent an obstacle  
so great as to  
deny me  
access to the court  
I feel  
the public  
I said 2  
to avoid  
initiation  
Purdum  
R/S*



The requirements for the filing of an appearance form, disclosure statement and civil appeal information statement are waived for pro se litigants.

**Counsel for Appellee**

As counsel for Appellee(s), you must file:

1. Application for Admission (if applicable)
2. Appearance Form
3. Disclosure Statement (except governmental entities)

These forms must be filed within **(14) fourteen days** of the date of this letter.

Attached is a copy of the full caption as it is titled in the District Court. Please review the caption carefully and promptly advise this office in writing of any discrepancies.

Very truly yours,  
Patricia S. Dodszuweit, Clerk

By: s/Laurie  
Case Manager  
267-299-4936

Enclosures:

Caption



UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

No. 23-2485

Meghan Kelly

(District Court No. 2-22-mc-00045)

**BRIEFING AND SCHEDULING ORDER**

Attorneys are required to file all documents electronically. See 3d Cir. L.A.R. 113 (2008) and the Court's CM/ECF website at [www.ca3.uscourts.gov/ecfwebsite](http://www.ca3.uscourts.gov/ecfwebsite).

It is **ORDERED** that the brief for Appellant(s) and the joint appendix shall be filed and served on or before **10/03/2023**.

It is **FURTHER ORDERED** that the brief(s) for Appellee(s) shall be filed and served within thirty (30) days of service of Appellant's (Appellants') brief.

It is **FURTHER ORDERED** that a reply brief, if any, shall be filed and served within twenty-one (21) days of service of Appellee's (Appellees') brief(s).

It is **FURTHER ORDERED** that in the event of default by Appellant in filing the brief and appendix as directed, the appeal may be dismissed without further notice.

It is **FURTHER ORDERED** that if Appellee fails to file a brief within the time directed, the matter will be listed on Appellant's brief only and Appellee may be subject to such sanctions as the Court deems appropriate.

**It is noted that, where applicable, parties must comply with 3rd Cir. LAR 31.2 which provides:** A local, state or federal entity or agency, which was served in the district court and which is the appellee, must file a brief in all cases in which a briefing schedule is issued unless the court has granted a motion seeking permission to be excused from filing a brief. The rule does not apply to entities or agencies that are respondents to a petition for review unless the entity or agency is the sole respondent or to entities or agencies which acted solely as an adjudicatory tribunal.

This Court requires the filing of briefs by counsel in both electronic and paper format. 3rd Cir. LAR 31.1(b). Pro Se litigants are exempt from the electronic filing requirement. **Parties must file 7 copies of the briefs; pro se parties who are proceeding in forma pauperis may file only 4 copies. Costs for additional copies will be permitted only if the Court directs that additional copies be filed.** Pursuant to 3rd Cir. LAR 30.1(a), counsel must electronically file the appendix in accordance with LAR Misc. 113.

Requiring postage, paper my amended appeal sought to avoid by doubling the pages I increased cost to 1 of 3

Booby Trap Made before initial docs both filed in bad faith added back history

appointed opposing counsel either PAODC or solicitor General

Checklists regarding the requirements for filing a brief and appendix are available on the Court's website at [www.ca3.uscourts.gov](http://www.ca3.uscourts.gov).

**For verbal extensions of time, please call 215-597-2995 and select option 3 for Case Management.**

For the Court,

s/ Patricia S. Dodszuweit  
Clerk

Date: August 24, 2023

cc: Meghan M. Kelly, Esq.

US DISTRICT COURT, EASTERN DISTRICT OF PA

In the Matter of a Member of the Bar	§	
MEGHAN M. KELLY,	§	Misc. No. 22-45
Respondent.	§	
	§	JUDGE: The Honorable Paul D.
	§	Paul S. Diamond, Judge

**Amended Notice of Appeal to include Notice of Appeal to a Court of Appeals  
From an Appealable Order of United States District Court for the Eastern  
District of PA  
Docket Number 33  
Case No. 22-45 2:22-mc-00045-**

Notice is hereby given that Meghan Kelly who proceeds pro se appeals to the United States Court of Appeals for the Third Circuit to amend her notice of appeal in the above referenced case to appeal from an additional Order dated August 7, 2023, denying *Respondent Meghan M Kelly's Motion for permission to use electronic filing, and waiver of paper copies before this Honorable Court, and an exemption from PACER costs to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, and compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights* and attached hereto. There is no opinion to publish.

I previously mailed notice to this court attached hereto, but this Court did not file it. This Court sent it to the Third Circuit. The Third Circuit also did not file it in the matter 22-3372. Though, it confirmed receipt of the physical copy.

Case: 23-2485 Document: 1-3 Page: 1 Date Filed: 08/24/2023



I understand the case is dismissed for failure to prosecute at this time. However, I have several options to consider, including but not limited to appealing to the US Supreme Court which may remand the case back to this Court rendering the order not moot, filing a motion to reopen the case to satisfy the failure to prosecute and other options.

I must file this notice to reserve the issue on appeal within the time to appeal in order to preserve my rights by asserting them.

If this Court may enter an Order, I must be afforded the 5<sup>th</sup> Amendment opportunity to preserve the record by appealing the same order within the time limits required under the Federal Rules.

If I appeal the case to the US Supreme Court, the US Supreme Court will likely hear it if at all after the time to provide notice has lapsed. Thus, I must assert my rights and fight government compelled elimination by forced not free choice.

I spoke with a number of this District Court's staff who recommended I file another Amended Notice. I thank them for their time.

Thank you.

Dated August 11, 2022

Respectfully submitted,

Case: 23-2485 Document: 1-3 Page: 2 Date Filed: 08/24/2023

8/11/23



/s/Meghan Kelly

Meghan Kelly, Esquire

34012 Shawnee Drive

Dagsboro, DE 19939

meghankellyesq@yahoo.com

(302) 493-6693

Retired Bar No. 202268, INACTIVE, not  
practicing law on behalf of another

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

Dated: August 11, 2023

Meghan Kelly (printed)

 (signed)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN THE MATTER OF**

:

**Misc. No. 22-45**

:

**MEGHAN MARIE KELLY**

:

**ORDER**

**AND NOW**, this 7th day of August, 2023, it is hereby **ORDERED** that Meghan Kelly's Motion for Permission to Use Electronic Filing (Doc. No. 31) is **DENIED without prejudice as moot.**

**AND IT IS SO ORDERED.**

*/s/ Paul S. Diamond*

---

Paul S. Diamond, J.



**TRANSCRIPT PURCHASE ORDER****For Third Circuit Court of Appeals**District Court Eastern District of PACourt of Appeals Docket No. 22-3312District Court Docket No. 22-45Short Case Title Meghan Kelly respondent Appellant v District Court Eastern District of PA, nullipelle

Date Notice of Appeal Filed by Clerk of District Court \_\_\_\_\_

**Part 1. (To be completed by party responsible for ordering transcript)**

NOTE: A SEPRATE FORM IS TO BE TYPED FOR EACH COURT REPORTER IN THIS CASE.

**A. Complete one of the following and serve ALL COPIES:****TRANSCRIPT:**

- ☒ None ☐ Unnecessary for appeal purposes.
- ☐ Already on file in the District Court Clerk's office.
- ☐ This is to order a transcript of the proceedings heard on the date listed below from N/A (Court Reporter)
- (Specify on lines below exact date of proceedings to be transcribed). If requesting only partial transcript of the proceedings, specify exactly what portion or what witness testimony is desired.

If proceeding to be transcribed was a trial, also check any appropriate box below for special requests; otherwise, this material will NOT be included in the trial transcripts.

- ☐ Voir dire; ☐ Opening statement of ☐ plaintiff ☐ defendant
- ☐ Closing argument of ☐ plaintiff ☐ defendant
- ☐ Jury instructions ☐ Sentencing Hearings

FAILURE TO SPECIFY IN ADEQUATE DETAIL THOSE PROCEEDINGS TO BE TRANSCRIBED, OR FAILURE TO MAKE PROMPT SATISFACTORY FINANCIAL ARRANGEMENTS FOR TRANSCRIPT, ARE GROUNDS FOR DISMISSAL OF THE APPEAL OR IMPOSITION OF SANCTIONS.

This is to certify that satisfactory financial arrangements have been completed with the court reporter for payment of the cost of the transcript. The method of payment will be:

- ☐ Criminal Justice Act (Attach copy of CJA form 24)
- ☐ Motion for transcript has been submitted to District Court Judge
- ☐ Private Funds

Signature [Signature] Date Aug 7, 2023Print Name Meghan Kelly Counsel for Pro Se, N/AAddress 34612 Shawnee Drive, Dayton, DE 19104 Telephone 302-445-6693**Part II. COURT REPORTER ACKNOWLEDGEMENT (To be completed by the Court Reporter and forwarded to the Court of Appeals on the same day transcript order is received.)**

Date transcript order received	Estimated completion date; if not within 30 days of date financial arrangements made, motion for extension to be made to Court of Appeals	Estimated number of pages

- ☐ Arrangements for payment were made on \_\_\_\_\_
- ☐ Arrangements for payment have not been made pursuant to FRAP 10(b)

Date \_\_\_\_\_

(Name of Court Reporter) \_\_\_\_\_

Telephone \_\_\_\_\_

**Part III. NOTIFICATION THAT TRANSCRIPT HAS BEEN FILED IN THE DISTRICT COURT (To be completed by court reporter on date of filing transcript in District Court and notification must be forwarded to Court of Appeals on the same date.)**

This is to certify that the transcript has been completed and filed with the District Court today.

Actual Number of Pages \_\_\_\_\_

Actual Number of Volumes \_\_\_\_\_

Date \_\_\_\_\_

Signature of Court Reporter \_\_\_\_\_

Case: 23-2485 Document: 1-3 Page: 5 Date Filed: 08/24/2023

# Exhibit



THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,  
Respondent.

v.

United States District Court,  
Eastern District of Pennsylvania

§ APPEALS COURT  
§ CASE NUMBER: 22-3372  
§ DISTRICT COURT  
§ Misc. No. 22-45  
§ DISTRICT COURT  
§ JUDGE: The Honorable Paul D.  
§ Paul S. Diamond, Judge

Amended Notice of Appeal

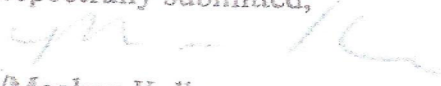
Notice is hereby given that Meghan Kelly who proceeds pro se appeals to the United States Court of Appeals for the Third Circuit wishes to amend her notice of appeal in the above referenced case to appeal from an additional Order dated August 7, 2023, and attached hereto. There is no opinion to publish.

I understand the case is dismissed for failure to prosecute at this time. However, I have several options to consider, including but not limited to appealing to the US Supreme Court which may remand the case back to this Court rendering the order not moot, filing a motion to reopen the case to satisfy the failure to prosecute and other options.

I must file this notice to reserve the issue on appeal within the time to appeal in order to preserve my rights by asserting them.

Dated August 7, 2022

Respectfully submitted,

  
/s/Meghan Kelly  
Meghan Kelly, Esquire

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

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

Dated: August 27, 2023

Meghan Kelly (printed)

[Signature] (signed)

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN THE MATTER OF  
  
MEGHAN MARIE KELLY

:  
:  
: Misc. No. 22-45

**ORDER**

AND NOW, this 7th day of August, 2023, it is hereby **ORDERED** that Meghan Kelly's Motion for Permission to Use Electronic Filing (Doc. No. 31) is **DENIED** without prejudice as moot.

AND IT IS SO ORDERED.

*/s/ Paul S. Diamond*

\_\_\_\_\_  
Paul S. Diamond, J.



**TRANSCRIPT PURCHASE ORDER**  
**For Third Circuit Court of Appeals**

District Court Eastern District of PA

Court of Appeals Docket No. 22-3372

District Court Docket No. 22-43

Short Case Title Meghan Kelly v. [illegible] District Court Eastern District of Pennsylvania  
Date Notice of Appeal Filed by Clerk of District Court

Part 1. (To be completed by party responsible for ordering transcript)

NOTE: A SEPRATE FORM IS TO BE TYPED FOR EACH COURT REPORTER IN THIS CASE.

A. Complete one of the following and serve ALL COPIES:

**TRANSCRIPT:**

- ☒ None ☐ Unnecessary for appeal purposes.  
☐ Already on file in the District Court Clerk's office.  
☐ This is to order a transcript of the proceedings heard on the date listed below from N/A (Court Reporter)  
(Specify on lines below exact date of proceedings to be transcribed). If requesting only partial transcript of the proceedings, specify exactly what portion or what witness testimony is desired.

If proceeding to be transcribed was a trial, also check any appropriate box below for special requests; otherwise, this material will NOT be included in the trial transcripts.

- ☐ Voir dire; Opening statement of ☐ plaintiff ☐ defendant  
Closing argument of ☐ plaintiff ☐ defendant  
☐ Jury instructions ☐ Sentencing Hearings

FAILURE TO SPECIFY IN ADEQUATE DETAIL THOSE PROCEEDINGS TO BE TRANSCRIBED, OR FAILURE TO MAKE PROMPT SATISFACTORY FINANCIAL ARRANGEMENTS FOR TRANSCRIPT, ARE GROUNDS FOR DISMISSAL OF THE APPEAL OR IMPOSITION OF SANCTIONS.

B. This is to certify that satisfactory financial arrangements have been completed with the court reporter for payment of the cost of the transcript. The method of payment will be:

- ☐ Criminal Justice Act (Attach copy of CJA form 24)  
☐ Motion for transcript has been submitted to District Court Judge  
☐ Private Funds

Signature [Signature] Date Aug 7, 2023  
Print Name Meghan Kelly Counsel for P. 30, N/A  
Address 3402 Shuman Drive, Dayton, OH 45424 Telephone 937-445-6643

Part II. COURT REPORTER ACKNOWLEDGEMENT (To be completed by the Court Reporter and forwarded to the Court of Appeals on the same day transcript order is received.)

Date transcript order received	Estimated completion date; if not within 30 days of date financial arrangements made, motion for extension to be made to Court of Appeals	Estimated number of pages

- ☐ Arrangements for payment were made on \_\_\_\_\_  
☐ Arrangements for payment have not been made pursuant to FRAP 10(b)

Date

(Name of Court Reporter)

Telephone

Part III. NOTIFICATION THAT TRANSCRIPT HAS BEEN FILED IN THE DISTRICT COURT (To be completed by court reporter on date of filing transcript in District Court and notification must be forwarded to Court of Appeals on the same date.)  
This is to certify that the transcript has been completed and filed with the District Court today.

Actual Number of Pages

Actual Number of Volumes

Date

Signature of Court Reporter

Case: 23-2485 Document: 1-3 Page: 10 Date Filed: 08/24/2023

34612 Shawnee Dr.  
Dagsboro, DE 19939

Clerk's Office, U.S. District Court  
Eastern District of PA  
James A. Byrne U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106





## 22-45 Amended Notice of Appeal mailed out August 7, 2023

From: Meg Kelly (meghankellyesq@yahoo.com)

To: gail\_olson@paed.uscourts.gov; chambers\_of\_judge\_paul\_s\_diamond@paed.uscourts.gov

Cc: meghankellyesq@yahoo.com

Date: Monday, August 7, 2023 at 03:45 PM EDT

Good afternoon,

Attached, please find an amended notice, attached Order dated August 7, 2023 I seek to appeal denying my Motion as allegedly moot.

The Transcript Form showing there is no transcript to request. It is not applicable, and a copy of the envelop showing I mailed these items out to you today.

What is your position should I request an extension of time to draft an appeal as I discern how best to prevent 6 potentially additional law suits?

Respectfully,

Meg

Meghan Kelly

34012 Shawnee Dr

Dagsboro, DE 19939

(302) 493-6693

meghankellyesq@yahoo.com

Acting pro se defending my religious belief in Jesus as God not money and material gain as God. Matthew 6:24



Amended Notice of appeal.pdf

754.1kB



Attached additional Order dated Aug 8, 2023.pdf

114.1kB



Transcript Form no transcript required Aug 7 2023.pdf

963.6kB

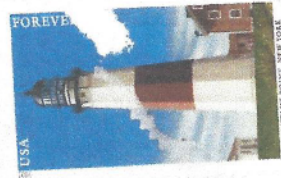


Envelope mailed Aug 7 2023.pdf

567.2kB

Case: 23-2485 Document: 1-3 Page: 12 Date Filed: 08/24/2023

Meghan Kelly  
34012 Shawnee Dr.  
Dagsboro DE 19939



U  
Clerk of Court, U.S. District Court  
Eastern District of P.A.  
James A. Byrne  
60109  
Market Street  
Philadelphia PA 19106

# Exhibit D



22-45 Fw: proof the Court wrongfully sealed my petitions averring Court misconduct and violations of my right to petition to compel me to forgo my lawsuit against Trump and to conceal evidence in my favor in the DE Disciplinary proceeding and reciprocal proceedings (file and serve)(reach out to Jason on claim No)Re: Meghan Kelly/Delaware Supreme Court/ Question dates sealing and unsealing...

From: Meg Kelly (meghankellyesq@yahoo.com)  
To: gail\_olson@paed.uscourts.gov; chambers\_of\_judge\_paul\_s\_diamond@paed.uscourts.gov  
Cc: meghankellyesq@yahoo.com; david.weiss@usdoj.gov  
Date: Friday, June 30, 2023 at 02:21 PM EDT

----- Forwarded Message -----  
From: Jason Gonzales <jgonzales@fileandserve.com>  
To: Meg Kelly <meghankellyesq@yahoo.com>  
Sent: Wednesday, November 16, 2022 at 03:27:07 PM EST  
Subject: RE: (file and serve)(reach out to Jason on claim No)Re: Meghan Kelly/Delaware Supreme Court/ Question dates sealing and unsealing...

Hi Ms. Kelly,

I've gathered the information you requested. The Access Type reflects the security status of the transaction document and the Submit Date reflects the date the Access Type was updated.

CASE 119.2021

Transaction ID 66649842, docket item 21.

Submit Date	Review Status	Reviewer	Reason	Comment	Document Type	Document Title	Access Type	Statutory Fee
May 17 2022 8:21AM EDT	Accepted (6/2/2021)	28, Supreme Court			Motion - Other	Document entitled "Motion for recusal" filed by appellant. (283)(dja)	Public	\$0.00
Jun 3 2021 8:36AM EDT	Accepted (6/2/2021)	28, Supreme Court			Motion - Other	Document entitled "Motion for recusal" filed by appellant. (283)(dja)	Sealed, electronic	\$0.00
Jun 2 2021 11:55AM EDT	Accepted (6/2/2021)	28, Supreme Court			Motion - Other	Document entitled "Motion for recusal" filed by appellant. (dja)	Sealed, electronic	\$0.00
Jun 2 2021 11:29AM EDT	Pending			Document created	Motion - Other	Document entitled "Motion for recusal" filed by appellant. (dja)	Sealed, electronic	

Transaction ID 66639035, docket item 16

Submit Date	Review Status	Reviewer	Reason	Comment	Document Type	Document Title	Access Type	Statutory Fee
May 17 2022 8:20AM EDT	Accepted (5/27/2021)	28, Supreme Court			Motion - Other	Document entitled "appellant's motion for the Delaware Supreme Court to rein in its arms through its agents from unlawfully pressuring appellant to forgo or impede her case to protect her free exercise of religion by relief it seems just" (documents received by email 5-25-21) (556) (dja)	Public	\$0.00
May 27 2021 3:09PM EDT	Accepted (5/27/2021)	28, Supreme Court			Motion - Other	Document entitled "appellant's motion for the Delaware Supreme Court to rein in its arms through its agents from unlawfully pressuring appellant to forgo or impede her case to protect her free exercise of religion by relief it seems just" (documents received by email 5-25-21) (556) (dja)	Sealed, electronic	\$0.00
May 27 2021 2:52PM EDT	Pending			Document created	Motion - Other	Document entitled "appellant's motion for the Delaware Supreme Court to rein in its arms through its agents from unlawfully pressuring appellant to forgo or impede her case to protect her free exercise of religion by relief it seems just" (documents received by email 5-25-21) (556) (UNDER SEAL)(dja)	Sealed, electronic	

Transaction Item number 66667019, Docket Item 40, appendix A-4, Docket item 41 Appendix A-5.

Submit Date	Review Status	Reviewer	Reason	Comment	Document Type	Document Title	Access Type	Statutory Fee
May 17 2022 8:22AM EDT	Accepted (6/8/2021)	28, Supreme Court			Appendix	Appendix A-4. (dja)	Public	\$0.00
Jun 8 2021 4:10PM EDT	Accepted (6/8/2021)	28, Supreme Court			Appendix	Appendix A-4. (dja)	Sealed, electronic	\$0.00
Jun 8 2021 4:00PM EDT	Pending			Document created	Appendix	Appendix A-4. (dja)	Sealed, electronic	

Submit Date	Review Status	Reviewer	Reason	Comment	Document Type	Document Title	Access Type	Statutory Fee
May 17 2022 8:22AM EDT	Accepted (6/8/2021)	28, Supreme Court			Appendix	Appendix A-5. (dja)	Public	\$0.00
Jun 8 2021 4:10PM EDT	Accepted (6/8/2021)	28, Supreme Court			Appendix	Appendix A-5. (dja)	Sealed, electronic	\$0.00
Jun 8 2021 4:00PM EDT	Pending			Document created	Appendix	Appendix A-5. (dja)	Sealed, electronic	\$0.0

Case 58.2022

Per the September 7, 2022 order in the first docket attached hereto, relating to Delaware Supreme Court matter IMO Meghan Kelly a member of the bar, the court ordered the case unsealed.

At the end of September, the Court contacted File & ServeXpress, where it was discovered that a configuration at the Case Class level was hindering the security setting in the case. Upon, File & ServeXpress's suggestion, the court updated the case type on September 29, 2022 which made most of the documents in the is case public on September 30, 2022.

Additionally, the court notified File & ServeXpress on October 5, 2022 that some case documents were not viewable at the Public Access Terminals and in CourtLink. It was discovered that some documents did not take to the case type update. The solution required intervention from our DEV OPS team who were able to resolve the issue. We delivered a resolution on October 6, 2022 that made all case document public.

Jason

[in](#)
[Twitter](#)
[f](#)
[Instagram](#)
[YouTube](#)



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**Subject:** RE: (file and serve)(reach out to Jason on claim No)Re: Meghan Kelly/Delaware Supreme Court/ Question dates sealing and unsealing matters/o 119-2021 and matter No 58-2022

Jason

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**Subject:** (file and serve)(reach out to Jason on claim No)Re: Meghan Kelly/Delaware Supreme Court/ Question dates sealing and unsealing matters/o 119-2021 and matter No 58-2022

(302)493-6693

2 of 5

7/11/2023, 7:40 PM

[<image018.png>](#)





# Exhibit E

(sealed Motion)

IN THE SUPREME COURT OF THE STATE OF DELAWARE

Meghan Kelly,	)	
	)	No. 119, 2021
Plaintiff Below,	)	
	)	
Appellant,	)	
	)	
v.	)	
	)	
Donald Trump, a.k.a. Donald J.	)	
Trump, a.k.a. President Trump	)	
a.k.a. President Donald Trump,	)	
in his official capacity as President of	)	
the United States	)	
	)	
Defendant Below,	)	
	)	
Appellant,	)	

APPELLANT’S MOTION FOR THE DELAWARE SUPREME COURT TO REIN IN ITS  
ARMS THROUGH ITS AGENTS FROM UNLAWFULLY PRESSURING APPELLANT TO  
FORGO OR IMPEDE HER CASE TO PROTECT HER FREE EXERCISE OF RELIGION.  
BY RELIEF IT DEEMS JUST

1. I, Meghan Kelly, pro se appellant, having been granted in forma pauperis relief, move this honorable Delaware Supreme Court, unopposed, to reign in its arms through its agents unlawfully pressuring appellant to forgo or impede her case to protect her free exercise of religion, by relief it deems just. I suggest private guidance.

2. My faith in God may appear crazy to others. Nevertheless, I have the freedom to believe by the dictates of my conscience, no matter what the government through its agents believes. *Cantwell v. State of Connecticut*, 310 U.S. 296, 60 S. Ct. 900, 84 L. Ed. 1213 (1940). I am allowed to think differently instead of being conditioned to worship as the state’s forced will of materialism, pursuit of money, and unholy charity that damns people to hell per Jesus, such as fundraising or organized charity. Jesus teaches people “have their reward,” meaning they have no reward, no eternal life from God. Matthew 6:1. Organized charity, fundraising, pro bono,

and volunteering is no small sin. It is not true charity, but damns people to hell by teaching business greed is love. *See Matthew* 6:1-5. Also *see, State ex rel. Tate v. Cabbage*, 210 A.2d 555, 557, 1965 Del. Super. LEXIS 67, \*1, 58 Del. 430, 433, (“It is no business of courts to say that what is a religious practice or activity for one group is not religion under the protection of the First Amendment. Nor is it in the competence of courts under our constitutional scheme to approve, disapprove, classify, regulate, or in any manner control sermons delivered at religious meetings.”); *See, Africa v. Pennsylvania*, 662 F.2d 1025, 1025, 1981 U.S. App. LEXIS 16448, \*1, (3d Cir.), *cert. denied*, 456 U.S. 908, 72 L. Ed. 2d 165, 102 S. Ct. 1756 (“It is inappropriate for a reviewing court to attempt to assess the truth or falsity of an announced article of faith. Judges are not oracles of theological verity, and the founders did not intend for them to be declarants of religious orthodoxy. However, while the truth of a belief is not open to question, there remains the significant question whether it is truly held. Without some sort of required showing of sincerity on the part of the individual or organization seeking judicial protection of its beliefs, the U.S. Const. amend. I would become a limitless excuse for avoiding all unwanted legal obligations.”); *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 682, 134 S. Ct. 2751, 2759, 189 L. Ed. 2d 675, 680, 2014 U.S. LEXIS 4505, \*1. (“Courts have no business addressing whether sincerely held religious beliefs asserted in a RFRA case are reasonable.”); *Employment Div., Dept. of Human Resources of Ore. v. Smith*, 494 U. S. 872, 887, 110 S. Ct. 1595, 108 L. Ed. 2d 876 (1990). (“Repeatedly and in many different contexts, we have warned that courts must not presume to determine the place of a particular belief in a religion or the plausibility of a religious claim.”); *Presbyterian Church in U. S. v. Mary Elizabeth Blue Hull Memorial Presbyterian Church*, 393 U. S. 440, 450, 89 S. Ct. 601, 21 L. Ed. 2d 658 (1969) (holding that “the First Amendment forbids civil courts from” interpreting “particular church doctrines” and



determining “the importance of those doctrines to the religion.”); *Ben-Levi v. Brown*, 136 S. Ct. 930, 934, 194 L. Ed. 2d 231, 235-236, 2016 U.S. LEXIS 991, \*10-12. See, *Holt v. Hobbs*, 574 U.S. 352, 352, 135 S. Ct. 853, 856, 190 L. Ed. 2d 747, 747, 2015 U.S. LEXIS 626, \*1, 83 U.S.L.W. 4065, 93 A.L.R. Fed. 2d 777, 25.

3. I write to alert this Honorable Court concerning actions by state government agents taken to apparently impede and obstruct my access to the Courts in this proceeding. I object to such interference, and reserve these issues for appeal, mentioned in part in Exhibit 55, attached hereto, and mentioned below, incorporated herein as if part of this letter, and in my brief, below. Dckt 60 at 63-64.

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

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

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

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

8. I asked the Master for her help. She kindly helped me. Dckt 55, 58.

9. In addition, the ODC impermissibly interfered with this case by contacting Judge Clark, per Judge Clark’s admission.

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

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

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

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

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

15. “Congress, the Executive, and the Judiciary all have a duty to support and defend the Constitution.” *Salazar v. Buono*, 559 U.S. 700, 130 S. Ct. 1803, 176 L. Ed. 2d 634 (2010)

16. “There is no ‘de minimis’ defense to a First Amendment violation.” *Doe v. Indian River Sch. Dist.*, 653 F.3d 256, 259, 2011 U.S. App. LEXIS 16121.

17. “The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.” *Mullin v. Sussex County*, 861 F. Supp. 2d 411, 415, 2012 U.S. Dist. LEXIS 67571, \*1

18. I will likely continue to suffer government threats by the state if the Court does not help me by upholding the Constitutional limits from state overreach.

19. I am standing up for my personal freedom to worship Jesus according to the dictates of my conscience, even if no one else shares the same beliefs, without government persecution.

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

21. “Government official's conduct violates “clearly established” law, so that the official is not entitled to qualified immunity, when, at the time of the challenged conduct, the contours of a right are sufficiently clear that every reasonable official would have understood that what he is doing violates that right.” *Id.*

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

23. I object to disparate treatment based on religious affiliation on due process, first amendment and equal protection grounds. I object under RFRA too. See, *Tanzin v. Tanvir*, 141 S. Ct. 486, 208 L. Ed. 2d 295 (2020). The Supreme Court in dicta explained RFRA applied to state and local employees and agents, not merely federal officials.

24. I received additional pressure by the arms of this Honorable Delaware Supreme Court on May 24, 2021. I received an E-mail offering alleged help from an arm of the Court, the Delaware Lawyers Assistance Program (“DE-LAP”), from Carol P. Waldhauser, Executive Director, copying a mental health professional, relating to a past request for a waiver of attorney filing fees. Attached hereto as an Exhibit.

25. It was not help to pay the fee. I paid the fee long ago, though I did not receive a response from this Honorable Supreme Court, per my request back in January 2021 or secondary request in February 2021. I certainly hope this Honorable Court did not instigate the abuse by its arms. If so, please desist.

26. DE-LAP was looking after its own interests, which conflicts from mine.

27. I am a Christian. I believe people go to hell for trusting in what psychologists, mental health professionals, psychiatrists and behavioral theorists teach, which often is focused on being happy or productive materially instead of being holy. The organization premises its existence on mental health theories which I believe harm people. I believe such theories teach patients to seek to fulfill their own material desires instead of doing what is right, thereby teaching people to reflect a little piece of hell on earth, the image of Satan by living for self, conditionally caring based on relationship, reward and avoidance of harm with no sacrificial unconditional love or God in them, teaching a lie that damns. See Isaiah 14 to understand how Satan wanted to be his own God, as high as God, to place self-first. I believe their thinking

misleads patients to hell, especially BJ Skinner's theories, which most teachers, including myself learned.

28. These mental health professionals focus on misleading people to feel good, not be good, which is not good. I believe it is evil, misleading those they exploit for a paycheck to harm and hell.

29. Carol P. Waldhauser created the appearance of a threat by inaction by requiring a response within ten days.

30. While I believe artificial entities without hearts such as the ODC and DE-LAP, per se behave based on the mark of beast, absence of love, survival, for reward and avoidance of harm, serving greed by exploiting need, not doing good by their love of humanity, but seeking to control, eliminating free will by forcing the entities' will, its interest by threat of punishment, this Court has the power to reign in beasts, aka artificial entities without hearts, organizations, LLCs, corporations and such, with restraint in the form of the rule of law, which teaches love of humanity, not exploitation to serve the beasts' interests, the love for profit and praise at the cost of inhibiting freedom in the form of free will, freedom of conscience by forced will under the threat of government sponsored persecution by funding such entities or otherwise.<sup>1</sup>

---

<sup>1</sup> I did not know how bad the world was until I ran office. I think artificial entities without hearts, charities, organizations, not for profits and businesses through alternative entities ("beasts") tempt world leaders through donations, signatures or support in elections, essentially controlling the leaders to mislead by serving the leaders' self-interest by serving the beasts at the expense of the people. The entities who appear to control the world through world leaders arguably likely have contacts in Delaware. I have been writing US Attorney General Garland concerning ideas how he may persuade this Court to save the world in other cases, including one to alleviate an economic crash using laws like 18 USC section 666, considering bailouts, grants and tax breaks as bribes, especially concerning the big payouts in 2020. The courts can tame beasts without hearts with the rule of law, since Judges are not beasts or mere puppets of power or mere robots. Judges are powerful because they may choose to reflect the image of God by love for humanity, sacrificing potential profit for people, making many people richer in love and materially, instead of the few. Entities without hearts who seek to get as much as they can for as

31. I have the freedom to chase after God instead of chasing after money at this time in my life.

32. I have the freedom to pursue my religion by justice in the courts, to protect my freedom to worship by the dictates of my free will, not the forced will, not the dictates of the state through its agents to worship money, which I believe leads to damnation.

33. I believe business greed is the mark of the beast. Jesus teaches you cannot serve God and money. Matthew 6:24. 1 Timothy 6:10, I stand by God.

34. I am in danger, a different type the bodily harm I will discuss in my brief, albeit I have been visibly shaken up clenching my teeth, and have cried concerning the state attacks related to this motion too.

35. Justice in the courts is a command by God. Amos 5:15. “Justice, mercy and faithfulness are greater commands” superseding concerns relating to costs and convenience. Citing Matthew 23:23.

36. Courts should sacrifice potential profit to serve people, not sacrifice people for the love of profit through entities’ unjust gains.

37. Please instruct your arms to stop bothering me or other relief this Honorable Court deems just, and to allow me to pursue my case without government threats.

38. I respectfully request the Court guide its arms through relief it deems just. I suggest correction through loving instruction, guidance to prevent additional government interference in this action. Please help.

---

little as they can will devour humanity, if humanity does not tame it. The heartless entities will seek to control people, if the courts do not take control of them, forcing people to reflect the image of Satan by behaving like heartless beasts too. I hope the Delaware courts will be our world’s hero should an economic crash occur too, saving lives and eternal lives.

39. On an aside, I am crying as I type this since I am reliving the wounds of the past where an arm of the Supreme Court economically persecuted me to protect those with shared interests.

40. While I took the Delaware Bar my ceiling at the dorm caved in with a leak and destroyed my bar materials, I paid thousands of dollars for. I complained to the supreme court. As a result, an arm of the court, the Board of Bar Examiners punished me and threatened me and made a complaint against me because I asked for help.

41. Where you see smoke, you think fire. I joined RLF on a contract for about \$135,000 a year. I did not get my contract renewed as the law firm participated in my bar admission.

42. Prior to that in law school, I had rats in my apartment the last semester and during bar exams. I complained.

43. Duquesne, a Christian Law School responded by blaming me and hiking up my rent.

44. The press helped me by putting me on TV and the newspaper, but no actual relief resulted, only harm. I was freaked out and emotionally exhausted. There was a bunch of baby rats trying to climb up my bed as I tried to get sleep. I was horrified. I did not pass the bar the first time. I got super high scores the second time and allegedly high scores in Delaware passing on the first try. I should not be ashamed. I am disappointed in the cold heartedness by the officials of a Christian law school.

45. While I was in law school, my brother was also in an accident. I sought permission to travel and take off time to delay my first bar exam, to see my brother, to make sure he would live.

46. Duquesne said yes. But a day or two before the exam I found a note in my box. They changed their mind. They tried to call me. I did not have a phone. I do not buy things I cannot afford. I go without as incurring debt is against my religious beliefs.

47. I took the exam in Civil Procedure, and received my worst grade, and hated civil procedure ever since as a reminder of the cold heartedness of the Christian university.

48. The fact I have a heart to fight heartless beasts, including charities, not for profits, businesses and churches, does not make me weak. It makes me human with the power to reflect the image of God by love, stronger than heartless beasts who seek cold hard cash for survival.

49. My cousin, Peter Conaboy ("PJ"), also was murdered while I was in law school. So, this is all very painful to relive, and to be reminded of by the May 24, 2021 letter.

50. His mother, my Aunt Jackie Conaboy is in the hospital now. She is doing poorly. She may not make it in this life or the next. At PJ's funeral the priest said "hurry it up. I have a luncheon" as people shared stories about PJ. I scolded the priest as I left. "What would Jesus say." My aunt Jackie remembered that. Ever since then, she has not gone to church, and she turned to wine not God for comfort. I do not think she will go to heaven, if she does not turn towards God for comfort. I pray, but recognize prayers are not enough at times since people have free choice. She may die soon. God's plan is the same for all. I discern whether people are lost or saved, whether they do man's plan or God's. She is not okay.

51. I learned early to turn to God for comfort, not to turn to any imperfect person or thing in this world for my comfort. I am not like the world. I am sad for the world, as I seek to heal it with love, through justice in the courts, shedding light on evil, not celebrating evil as good.



52. While scars remain well beyond our fleeting lives, harming future generations, and relived by new attacks such as the May 24, 2021 attack, this Court can prevent future harm to me by government actors misbehaving by seeking their own power and profit in this case, right here, right now, before it is too late, and additional harm is incurred, lasting beyond the fleeting lives of the perpetrators who act on self-interest, not love.

May 25, 2021

Respectfully Submitted,

/s/ Meghan Kelly  
Meghan Kelly  
34012 Shawnee Drive  
Dagsboro, DE 19939  
pro se, as a party, not an  
attorney advocate  
[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)

# Exhibit F

(sealed document)

IN THE SUPREME COURT OF THE STATE OF DELAWARE

Meghan Kelly,	)	
	)	No. 119, 2021
Plaintiff Below,	)	
	)	
Appellant,	)	
	)	
v.	)	
	)	
Donald Trump, a.k.a. Donald J.	)	
Trump, a.k.a. President Trump	)	
a.k.a. President Donald Trump,	)	
in his official capacity as President of	)	
the United States	)	
	)	
Defendant Below,	)	
	)	
Appellant,	)	

APPELLANT’S MOTION FOR THE DELAWARE SUPREME COURT TO REQUIRE THE  
RECUSAL OF THE HONORABLE CHIEF JUSTICE COLLINS J. SEITZ, JUNIOR IN THIS  
MATTER

1. I, Meghan Kelly, pro se appellant, unopposed, having been granted in forma pauperis relief, move this honorable Delaware Supreme Court, unopposed, move to recuse the Honorable Chief Justice Collins J. Seitz, Junior (“Chief Justice Seitz”) from participating in review of my case, requiring delegation to the other honorable Justices.

2. On about May 25, 2021, I sent the honorable Court *Appellant’s (unopposed) Motion to guide or reign in the arms of the Delaware Supreme Court, or for other relief this Court deems just*, (the “motion”), incorporated herein as if included in the first instance. I suggested private guidance. Motion at 1, 37, 38.

3. One of the allegations in the motion was concerning De-Lapp’s response to a request for a suspension of bar fees to serve De-Lapp’s purpose not to help to pay any fee since I paid such fees. Motion at 24 -30. Attached please find my receipt of payment of the Bar registration fee, incorporated as an exhibit, as if expressly stated herein.

4. I attached the May 24, 2021 attack letter as an exhibit to the motion, and incorporate it herein as if included as part of the motion.

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

6. The only person who knew I made a request for suspension of Attorney Registration of license fees is Chief Justice Seitz, since I made the request to him, and Mark Vavala.

7. I reached out to Mark Vavala (“Mark”) per the emails, attached herein and included and incorporated herewith as if alleged as part of this motion (“Emails”), admitted under the state of mind exceptions, belief and admissions. See Exhibit, the Emails.

8. I turned to Mark for guidance, as he has always treated me as a judge should, with respect regardless of poverty, religious belief or association, as to requesting relief for attorney registration fees.

9. In the past I turned to Mark when he was a commissioner when Cathy Marshall, the former Supreme Court Clerk treated me with great cruelty and disregard for humanity for cost and convenience, reflecting the image of Satan with regard to unbending rules and penalties regarding the rather unsafe requirement of registration online and by required use of emails during a heightened time of increased threats to electronic hacks.<sup>2</sup>

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<sup>2</sup> I am trying to persuade US Attorney General Garland to close the back doors on electronic devices President Bush Junior opened up under the guise of safety from terrorism. Bush opened the door to economic, speech and privacy attacks, making the entire globe less safe, especially with regards to health data, health insurance hacks and systems in recent years. Our information is more easily manipulated making us believe we are safe when the pandemic may not be waning as much as suspected. Please note, worldometer has not been reporting all states in its data but has excluded about ten states every day for the past two weeks. I suspect it is being manipulated, hacked, to market the vaccine as working better than it is. I have checked worldometer every day for over a year. They included most states every other day. This is strikingly concerning to

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me. See, Dckt 71, Exhibit E, Exhibit 26, copy of the web site worldometer, to show healthcare is the biggest global money maker and expense.

Bush sold our freedoms for money by opening the door to those who will kill, steal and destroy or diminish freedoms and lives to gain more material gain. Freedom is not for sale. People are not for sale, to those who require they pay for freedom. People are priceless not price tags, worthy of protection by this Court. Throwing money at a problem or grants is never the solution. Neither is money given to government agencies without strings attached. The spend it as you see fit or lose it provisions reward waste. Strings attached to laws must be tied with all government money offering guidance for good not evil greed, the mark of the damned. The desire for more government money for government partnered entities under the guise of charity or otherwise, including churches, is the problem. Business greed, to use for the study of things, science to manipulate to gain grants or business profit for something different or for a different fix instead of removing the problem should end. Entities are rewarded with more money by not resolving the problem. Government must fund itself, not pay bribes to entities which per se try to get as much as they can for as little as they can. Then, such entities may supplement with fundraising and charity which I believe damns people to hell. Schools, sports and the post offices would be fully funded if the government paid bills instead of bribes. Children learn to go the way to hell by learning early to rely on associations and organizations, artificial entities without hearts, that run on the mark of the beast to represent their interests, instead of choosing to use their own brains to think, to care, to know, to love, individually and specially, as the treasure they are. We lose treasures to hell. Children are forced to fundraise for sports and schools which will damn them to hell should they not unhardened their heads and learn such evil is bad, all to pay bribes of government agents to serve their interest. Property taxes should not be increased to fund government bribes, thereby creating disparate treatment by zip code, based on home values in violation of the Equal Protections Clause applicable to the states via the Fourteenth Amendment, with no rationally related purpose. The government would decrease waste, create a more fair, equal and just union if government employees, including Presidents and law makers, did their jobs instead of exploiting tasks to serve government agents personal interest including but not limited to getting out of work or liability, while arguably creating artificial debt in violation of the 13<sup>th</sup> amendment to serve greed not need, by paying entities to profit off of its government duties at a greater bill to its people in terms of not merely monetary loss but loss of constitutional freedoms. It is an abomination. The government itself is a heartless beast should the agents not use their power to individually use their free will, their brains, to think, to care, to know, to love people, instead of acting as heartless robots going through mechanical motions of a system. Then brainlessly blaming the system, instead of themselves, for problems they cared naught to address.

I digress, government funding for science is bad and a black hole, that should be closed from sucking the life blood and souls out of humanity by indentured servitude to feed unsatiable greed by entities without hearts. Just laws, just policies and justice in the courts is the solution to close the black hole. The government rewards businesses for made to break, made to repair and replace products, polluting in the production and polluting with replaced parts and products in the landfills. The US through its unjust decrees, including but not limited to the UCC, tax code wrote offs and insurance laws is the reason why the world is so polluted. China would not make made to break, service and replace products if our courts and laws did not reward such, instead of made to last goods, decreasing polluting in production and in parts. Money is never the

solution, since it rewards misbehavior, to create the endless lust for greed to make something different, or use of a product for a different function, not made to last, not made to work. Science is the study of things. When the pupils, doctors and scientists declare themselves to be the masters of the universe on a subject, the experts, or knowing the answers, they are per se stupid, and defeat science. Science, after all, is the mere study of things, not the master of things as defined by the scientific method with built in recognized uncertainties called variables, unknown and known. Meaning possible error, not knowing everything, is declared as part of the scientific method. Learning is good, but manipulating data while using good science, retrieved from tests for self-gain, not knowledge, is deceptive and wicked. Our government appears to be partnered with private industries, not for profits, businesses, and churches, by bought or bartered for bribes, in exchange for loyalty or backing of elections, paid with money taken from being used for the people's need, government infrastructure, not Biden's bad plan either, to be used to pay entities to perform the government's job because the government employees evade responsibility of working and blame for expenditures and plans not working, grants and bailouts to exploit the problem to waste money and cause harm to the world for self-gain, by creating industries to profit off of the problems instead of correcting the problem by making the world more safe by closing the back doors in electronics, including but not limited to making lawyers money by adding an unnecessary additional field, insurance companies, fields for miners who sell our data, anti-virus software companies. I am still brainstorming constitutional and criminal theories to persuade the US AG Garland to save us regarding foreseeable looming threats not by people but by entities without hearts, businesses, LLCs and such, by protecting our freedom of speech without government sponsored or encouraged threats against privacy or speech, and a potential 13<sup>th</sup> amendment argument regarding artificial debt which is a sin against God in the old testament especially, called inequity and will damn the perpetrators to hell despite their stupidity and ignorance. See, Matthew 13, Hosea 4:6. It is no small matter. It is a matter of heaven and hell. The Bible teaches people go to hell for misunderstanding evil for good and good for evil. Not knowing can kill you eternally. You have to care to think, care to know, care to love to escape the fire of the second death at the resurrection of the dead the last day. You must use your free will, your brain, not your belly, meaning your desires. *Philippians* 3:19, "Their end is destruction, their god is their belly (meaning their appetites, their desires), and they glory in their shame, with minds set on earthly things." I argued that Trump does not use his brain, but is reigned by his desires, the mark of the beast, the whore, the damned, the mark sadly most of humanity has should they not erase that mark before it is too late and they are dead. See Dckt 60 at 21,94,123, 124, 413. Trump is reigned by desires, emotions, instead of laying down his desires, to care to think to love others, by sacrificing to self. I am pointing this out to confirm believe not using your brain to think, to care, to love, is sin.

As a licensed teacher, previously substituting in the schools, I tried to teach kids they were loved and respected no matter whether they failed or succeeded, and to love and respect one another regardless as to whether others succeed or fail. I taught them to think for themselves, instead of writing what they thought I wanted to hear. I taught them their diverse unique view made us all smarter, by shedding light on a different perspective. I tried to teach kids the way to heaven young by Jesus's new command in John, to love one another, without violating the separation of church and state, without using God's name or bible verses in vain. I am pointing this out as I try to live my faith, live my religious beliefs by doing the will of God, through understanding Jesus's words. I believe Jesus is not kidding.

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I also have ideas on how Attorney General Merrick Garland can safeguard the right to vote, and eliminate the temptations for law makers to create unjust decrees and policies by removing three temptations to do so, eliminating money in politics, ending entity and private backing with money, by allowing the people to more equally and freely, not by purchase of support or opposing a candidate by the only equal, fair, free form, the vote.

Our laws fund grants for science that serve greed, the bottom line, not learning or truth to improve societal conditions. Our tax laws, grant policies and other laws increase temptations to make made to break, made to replace, polluting in the production, and polluting by throwing away replaced parts and products in landfills into infinity, to gain more money by selling replacement parts or products. More grants are given out for some different research. Greed for money is rewarded, driving out love for humanity leading to exploitation of the people and the environment, and I believe damnation in hell.

Additionally, our health care harms health to make people feel better, by feeling nothing, or by masking the ailment, often inhibiting people's faculties, their ability to use their free will, their brain, their mind, I believe guaranteeing their damnation in hell. I believe eternity is determined at the last day of your life. (See, Docket 77, Exhibit F, Exhibit 43, Article I drafted and factors relating to my passion to improve healthcare, to care for the sick and elderly's health, not destroy health by comfort care, eliminating the pain by causing patients to feel nothing, like vegetables, often inhibiting their free will which I believe they need to use to go to heaven, likely misleading the sick and elderly to hell, which breaks my heart, 1. Coastal Point, Guest Column, *Representative candidate says health is wealth*, By Meghan Kelly, Esq., Candidate Delaware House of Representatives, 38th District, 2. Document, *"Your Health is your Wealth You are Priceless. Not a price tag!* Kelly seeks Federal Consideration of Health Care Proposal, 3. Meghan Kelly's teaching certificate, which goes to credibility. I learned psychology and behavior theories like BF Skinner's. I also am licensed to teach health so I know something about health. 4. Meghan Kelly's redacted law school transcript to show she took a course Health Care Finance and the course Law and Medicine while attending Duquesne School of Law. 5. Meghan Kelly's redacted undergraduate college transcript to show she took relevant courses related to

- a. History of Western Medicine
- b. Economics
- c. Medieval Philosophy
- d. Psychology courses
6. Evidence of surgery that requires I drink water, rest and eat so I do not faint or die due to dehydration when I have my period. I lose five pounds every month. This is still a challenge. I must assert my right to live because many people serve Satan by not wanting to be inconvenienced to care to adapt to safeguard my life, or the lives and health of others.)

Drugging the elderly and sick people up so they cannot use their free will to choose to think, to care, to know, to love removes their freedom of conscience to choose the way to eternal life. It is healthcare, not comfort care, deceiving people to believe you are healing them only to be killing them in this life and the next by concealing pain. At this time, I may not have standing with these unrelated issues, but the Attorney General may have standing down the line. It is notable, about 33 billion has been misused for years via NIH for bad healthcare that cares less about patients' health and more about entities' wealth.

10. Mark is not hard headed, hard hearted or hard handed. He understands the rules are there to serve humanity, not exploit humanity for the cost and convenience by those who wield government power. See *Matthew 23:11*, regarding Jesus's claim leaders are servants. I believe servants of self are misleaders and deceivers, who exploit those they are charged to serve to serve those who serve them thereby serving themselves, reflecting the image of Satan, aka children of the devil not choosing to be saved from the fire the last day by laying down their desires to care to love those outside their own, specifically those who inconvenience them, and their greed by need. See, *John 8:47*, *1 John 3:10-11*, *Acts 13:10*, *Matthew 13:38*, regarding children of devil.

11. I thought I sinned against God by forgetting to look after Mark's daughter, an attorney within the arms of the ODC. I thought Mark's kid may have lost her job at the ODC, with the news of a new hiring at the ODC, because her father helped me in the form of guidance with regard to requesting a suspension or waiver of attorney fees from the Honorable Supreme Court by official request to Chief Justice Seitz. See Emails.

12. I realized the only two people on the planet aware of my request for the waiver are Chief Justice Seitz and Mark Vavala per that revelation in the E-mail. See Emails

13. In my horror and great sadness, I confronted Mark to determine whether he "threw me under the bus." Citing Emails. I quickly confronted him to determine the worst possible scenario to eliminate any doubt that may tarnish a professional relationship based on mutual respect for the dignity of all, even one another.

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Without protecting freedom of conscience, none are free, none have liberty, all are controlled by the forced will of heartless beasts, organizations and entities, even government, to serve what I argue is the mark of the beast, business greed. We must allow our judges to use their brain, their free will too, to think, to care, to love, instead of robotically adhering as troops in a war, where they no longer lead but are misled by heartless beasts that rule over them.



14. I tested him. Mark did not instigate the ODC and DE-Lapp attacks. See Emails.

15. Besides passing the test, I trust Mark Vavala as a former judge, a commissioner, without partiality based on self-interest. I sought Mark's help for years to gain his wisdom and kind guidance. He is smart and wise, and unafraid of tough questions, because he answers honestly with integrity, even with the honest response, I don't know.

16. The conclusion Mark Vavala was not the perpetrator of potential abuse me, led me to determine that Chief Justice Seitz may have instigated the abuse by De-Lapp and the ODC.

17. The interest for fees for an arm may have tarnished Chief Justice's vision as I noted in my motion, the Supreme Court itself may have instigated the abuse. Motion at 25.

18. Far worse, the Chief Justice may have instigated attacks by the ODC and De-Lapp discussed in my motion because my second request relating to waiving attorney registration fees is based on and intertwined with religious arguments in violation of my free exercise and the RFRA which applies to state agents too, including judges and judges' agents, its arms, ODC, De-Lapp, and their agents, foreseeably impeding and obstructing my access to the Courts in this proceeding.

19. I must correct my allegation at Motion at 25. I was blinded by my desire to persuade this court to save the world by saving me in my case, and possibly other matters, even if the court does not want to. Jesus says if we believe we can move mountains, we will move them. Citing Jesus, Mark 11:23. I believe I have an opportunity, not a guarantee, that I may move a mountain by moving this Court's justices' hearts to be our heroes. Mountains after all means impediments on our hearts, temptations to sin by comfort, costs and convenience instead

of doing what is right. Id., (See, *Luke* 8:10. Jesus speaks in parables so only those who seek his will instead of their own or the mere will of man understand what Jesus says by mountains and in general. Others do not choose to use their brains, their free will, to understand God's will, God's plan which is love. They, instead, willfully are blinded by worldly temptations and do not use their brains to think, to care to know, to care to love in truth, not lust, not covetousness based on lies.)

20. I forgot, this court did answer my first request for a suspension of fees relating to attorney registration based on unemployment or financial impediment. I am including the response attached to and incorporated therewith as an exhibit. See, the Court's response attached hereto.

21. In a letter dated February 2, 2021 the Court responded, "The Court acknowledges receipt of (my) letter dated January 7, 2021, wherein (I) request that the attorney registration fees for lawyers out of work due to the pandemic be waived.

22. I responded per the attached February 5, 2021 letter, attached hereto and incorporated herewith in toto, as an Exhibit. I provide in part:

"Thank you for the February 2, 2021 letter in which the Court indicated it would consider requests for waivers of attorney fees on a case by case basis, by formal request.

My concern, is accepting applications for waivers on a case by case basis violates the Equal Protections Clause applicable to the State's agencies, even the courts via the 14th Amendment, by disparate treatment within a class. I am likely not the only one out of work due to the pandemic. Others are struggling too. A case by case determination would likely be per se unconstitutional.

I will likely never have standing to stand up for those similarly situated with myself. Yet, if I made such a request, I would be asking the Court to treat me with preference instead of impartiality as required by law.

My conscience may not allow me to make such a request, tempting this Honorable Court to misbehave to serve my own gain.

I can, however, request that all fees for attorney registrations be the same regardless of years barred. So, I am making such a request for future consideration for 2022 and beyond. Please treat all lawyers the same by requiring the same lawyer registration fee for every lawyer, without persecution towards attorneys with more years of experience by an increased

fee. There is no rational basis for an increase in lawyer's fees based on number of years, except the desire for more money.

It is wrong to assume the longer you have been barred, the more money you have or must pay.

I am saddened when I see unjust decrees and policies based on the love of money, desire for money, at the cost of driving out the love for humanity, the people the state serves.

On an aside, the reason why I became a lawyer is my faith in Jesus Christ. Justice in the Courts is a command by God. See Amos 5:15. Jesus Christ taught that "justice, mercy, and faithfulness" are more important commands. Matthew 23:23.

23. In my second request relating to attorney fees, dated February 5, 2021, I go on to discuss more religious concerns therein.

24. I note, Mark Vavala in the Email exhibits noted 5 other attorneys reached out to him regarding attorney fee cost issues.

25. Imagine how many other lawyers may be struggling due to the pandemic, possibly catching the sickness or caring for a loved one or merely life's struggles unforeseeably hampering lawyer's capability to pay the Registration fee.

26. Such case by case application creates disparate treatment by the hidden reign of lusts or likes as it suits the judges interests, not the impartial rule of law, without selective application.

27. The Court should create a form that permits lawyers without the ability to pay to waive such fees, to automatically apply for waiver based on debt or financial burden, and such waivers should be freely given, instead of enslaving already financially desperate people with additional pressure.

28. No one is above the law. No one is below the law, not even judges who administer the laws. Judges must maintain their independence from self interest, and their appearance of independence.

27. “The Founders rejected the medieval myth that sovereign (rulers, even judges and Presidents) are anointed by God to rule over them. The Founders laid a new foundation for our country, based not on the lie of divine right, (but by free choice, the free will of the people based on the universal belief that) all people are created equal and all just powers are derived from the consent of the governed. They changed the very source and nature of Law. Law does not emerge from the mouth of a king but rather the votes of the freely chosen representations of the people,” with limited, not absolute power, limited by the Constitution by the Courts. Citing, Duquesne Lawyer, *The Rule of Law, the Constitution and Democracy*, by Wilson Huhn, Professor of Law, Spring 2021 Edition.

28. Partiality and the appearance of impartiality must be maintained in my case to protect the integrity of the courts.

29. I seek to protect the judiciary.

30. To maintain the integrity of the three branches of government.

31. In this United States, the Founders created checks and balances to prevent and fix branch overreach. The fact a check is made, means the system is focused on maintaining a more equal, fair, just union. Humans with hearts are in control and in charge of choosing to maintain, and service the checks on the executive, judicial and legislative branches, like a car in need of oil to run better. People must choose to use their brain to care to think, to care to know, to care to love humanity, instead of comfort, convenience and cost by avoiding tune ups in our system of government.

32. The fact I seek correction will not prevent me from seeking protection of the same system I am seeking to tune up through law suits, to prevent the engine of our nation from failing us, the impartial rule of law.

33. The Courts can uphold the integrity, encourage faith in the system by having the humility to understand it is run by imperfect people in need of guidance through checks and balances, the executive branch, the legislative branch and even the judiciary.

34. In addition, my little cousin, Ikey Adams, a family member, is a partner in Sidley Austin, in DC, where Chief Justice Seitz's daughter appears to work too.

34. These two issues, as to who instigating the government threats via the ODC and De-Lapp, and the familial relations, create the appearance of partiality, or bias that may blemish a rather historical case, should this Court allow me to go forward with arguments.

35. The President(s) need the court's heavy hand of loving guidance to reign in the Presidents' abuse and misuse of power and government funding by dissolving the establishment of government-religion. President Bush Junior, President Obama, President Trump, and President Biden all misbehaved, and misbehavior will continue well past their fleeting lives, should this court fail to declare the Presidents are not above the Constitution. Sovereign immunity seems to be waived for RFRA claims per the Supreme Court against officials, including the President. *Tanzin v. Tanvir*, 141 S. Ct. 486, 208 L. Ed. 2d 295 (2020)

36. I respectfully request that the Honorable Chief Justice be recused from deciding this case.

May 28, 2021

Respectfully Submitted,

/s/ Meghan Kelly  
Meghan Kelly  
34012 Shawnee Drive  
Dagsboro, DE 19939  
pro se, as a party, not an  
attorney advocate  
[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)

# Exhibit G

**MEGHAN MARIE KELLY, ESQUIRE**

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34012 Shawnee Drive  
Dagsboro, DE 19939

January 7, 2021

Delaware Supreme Court  
55 The Green  
Dover, DE 19901

**RE: Covid 19 order/Please suspend attorney fees for lawyers unemployed due to the pandemic**

Dear Honorable Supreme Court Chief Justice Collins J. Seitz, Jr.:

Thank you for allowing lawyers to file pleadings with the court via email so we do not die of Covid 19.

I am writing to respectfully request this Honorable Court waive attorney registration fees for lawyers, out of work, due to the pandemic.

I worked in 2018, but in 2019-2020, I worked without pay, actually sacrificing from what I little I had by contacting federal law makers in an attempt to:

1. Prevent the elimination of social security and Medicare, replaced with Matthew 6 violations (forced volunteering or business, not for profit and charitable donations and fundraising which I believe violate Jesus's teachings leading to harm and hell by teaching giving to get is love, driving out God, love, from the hearts of men replaced with business greed, which I believe is the mark of the damned should they not unharden their hearts).

2. Prevent oil and gas drilling up and down our coast.

On an aside, I am disappointed in my relative by affinity, Mark Braden, Esq., former counsel to the Republican party in DC. His kid has a job related to off shore drilling. So did one of Mr. George Cole's kids. Mr. George Cole retired from office, as the longest serving local politician in one seat in Delaware's history. (Mike Castle does not count since he hopped seats.).

It is wrong to compromise the environment and people's lives to serve your own family, especially by political people charged to serve the public.

3. Improve healthcare. Our healthcare is terrible because our laws and policies reward misbehavior and bad or different, not better care, at the expense of human life and health. Changing the laws would improve care. Throwing money at fundraisers and healthcare is incentive for more bad care, greed for more and more money.

Just decrees teach people to care about other people. Unjust decrees teach people to love money, rewarding misbehavior, encouraging folks to harm one another by ignorance or otherwise to serve money.

4. Prevent the kill old people laws suggested to save money. People are priceless, not price tags. The elderly, ill and vulnerable are easily manipulated into believing hurting themselves helps others through the death with dignity acts.

There is too much temptation for people to encourage the elderly to harm themselves, die, and sadly I believe go to hell. Judas and Saul went to hell in the Bible for killing themselves.

Leaders misbehave when they draft laws and policies which encourage those they serve to die and potentially go to hell. I want people to live and have eternal life. Per the bible, just decrees and justice in the courts has the power to save lives and eternal lives.

You really have the power to be life savers and eternal life savers as judges, via correction to prevent condemnation in hell for the love of money driving out love for humanity.

5. I proposed 5 articles of impeachment and contacted all 541 federal law makers.

Since, I did not work during 2019-2020, I am not eligible for the \$600 bail out, and will not likely be eligible for future bail outs.



My old law firm was interested in me in 2020. I was negotiating for a position, per the attached emails. I stopped the negotiations to sue the Democrats because seeking to do the right thing is more important than money. Then, the pandemic hit. I withdrew my law suit since I did not want people to die, and reached out to my law firm. Negotiations are on a stand still. Covid19 hampered prospects.

I am concerned about dying for dollars, during this pandemic. I actually was born with breathing problems, and have severe allergies that make my throat close up. So, catching covid19 would likely be a death sentence for me.

Thank you for considering my life potentially more valuable than a few hundred dollars.

The Supreme Court could possibly include a suspension of lawyer fees, solely for the unemployed, in their covid19 measures. I tried to contact the Governor too. The Governor could also include a suspension for licensure fees for those unemployed, limited to those not using their license during the pandemic, too.

Thank you for your kind consideration.

Respectfully submitted,

Meghan Kelly, Esquire  
Pro Se, Bar # 4968  
34012 Shawnee Drive  
Dagsboro, DE 19939

# Exhibit H

(DI 20 DE District Ct Matter 21-1490 dated Nov 6, 2021, filed November 8, 2021)

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

Plaintiff's Motion for Reargument

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

I also seek to vacate the Order because the Court erred as a matter of law by disregarding all my pled facts, pled legal arguments, not limited to Defendants' conduct, and the conduct through its coconspirators, or agents De-Lapp and Judge Clark, a Court of Common Pleas, in violation of federal law, where I am a party for my exercise of federal rights, and by initiating a proceeding, under the color of the law, in violation of the Constitution and federal law, as applied against me, a party of one, under the pleadings in my complaint, and exhibits incorporated therein by reference, and in the motions, and exhibits thereto, motivated by their disdain for my religious beliefs reflected in my speech, petitions and association. Id. Judge Clark sought to intimate me with the cloak of his Court authority related to and

with intent to interfere with my exercise of First amendment rights. (D.I. 1-19). He interfered with my case, seeking to interrogate me, and demand I call him or come to his chambers. I made petitions for relief to suspend attorney license fees due to poverty. I made petitions to Master Griffin of the Chancery Court and the Supreme Court related to disparate treatment by staff based on poverty, religious beliefs, association and, or petitions. The Chancery Court through staff to misled me into almost missing my filing date to appeal Kelly Trump, and instructed me to cross off the Delaware lawyer's address in the praecipe to prevent service to local counsel.. The Court abused discretion by disregarding the facts and legal arguments I pleaded, and by making no determination on such arguments. The Court made an error of apprehension. *Id.* Even on a Motion to dismiss the Court is required to consider "whether the allegations on the face of the complaint, taken as true, allege facts sufficient to invoke the jurisdiction of the district court." *Licata v. U.S. Postal Serv.*, 33 F.3d 259, 260 (3d Cir. 1994). The Court abused its discretion by ignoring, failing to address all the facts and pleadings in my complaint and motions before dismissing a case, related to fundamental rights requiring strict scrutiny to be upheld. Defendants face no irreparable harm. I am not working and have not represented anyone but myself, as an attorney in years, and will not represent anyone anytime soon. I sought to make a difference differently by attempting to revise the laws over the years. I believe religion and state must be separate. People should worship or not according to the dictates of their conscience, not the dictates of the government through their partners, including religious entities. When my religious liberties were at stake, I gave up public office aspirations for God, in hopes the Courts would safeguard our religious freedoms. *Younger* does not apply. I am not asking the Court to make a disciplinary determination. I am asking the Court to, *inter alias*, (1) enjoin the Disciplinary Proceedings until a determination is made, leaving time for appeals to determine whether the conduct by the defendants violated the first amendment applicable to defendants pursuant to the fourteenth amendment concerning my free exercise of religion, speech, association, and petitioning the government to address grievances, 42 USC §§ 1985(2), 1983 ("federal law"), and (2) determine whether the proceedings themselves are a violation of federal law. (D.I. 1, 2, 3, 4, 9, 10, 7, 8, 6, 12, 11, 14.) (1) The conduct by Defendants and the coconspirators as pled are a violation of federal law, and (2) the

proceedings themselves are a violation of federal law. (D.I. 1-19). I asked the Court for a preliminary injunction, a temporary restraining order, and waiver of bond to prevent the suppression of my right to petition to safeguard my civil rights due to destitute and inability to pay to prevent waiver of my First Amendment rights based on inability to pay. I did not ask the court to conduct a disciplinary trial. My complaint asks for additional relief, and alleged additional harm beyond injunctive relief, including but not limited to damages, physical harm, humiliation, emotional distress, harm to my life, safety, livelihood, and other relief from harm the Court did not address. Injunctive relief while the main relief, is not the only relief I requested. I would also like to include nominal relief, as the violation of my First Amendment rights are more important to protect than money or my license, though I seek to protect my license and ability to find work too. (D.I. 2, 3, 4). *Uzuegbunam v. Preczewski*, 141 S. Ct. 792, 794, (2021). Someone talked about shooting me based on my speech reflecting my religious affiliated beliefs, albeit before the suit, a scary man took off his mask and got close to my face and yelled at me for my apparent beliefs endangering me to covid-19, and Mr. Layton had two bullets almost hit him and his wife as they sat at their kitchen table in their home for his exercise of First Amendment rights. D.I. 2, 3. I am scared Protection of my freedom of speech, religious exercise, association and right to petition, despite religious beliefs, poverty, unemployment, and profession is something I seek this Court to protect which is far greater than my active license to practice law, or all the money in the world, for freedom cannot be bought and sold, should the court fail to grant injunctions, with claims for nominal damages, potential additional relief as more harm arises, and damages. The Defendants and Court agents by their positions are not above the Constitutional law, immune to punish me for my exercise of a fundamental right requiring their need to meet strict scrutiny which it does not. I do not lose my right to seek relief in Court for their violations of the Constitutional law and federal laws in exchange for my license to practice law or by the institution of proceedings against me. They knew or should have known their conduct violated federal law, even if I am poor and unemployed. I am not deemed less worthy of protections under the law by mere poverty, but am equal to those of great wealth under the constitution. Judges and arms of the court are not above the Constitution and must be limited to adhere to the Constitution by outside courts

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

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

**Kelly v Trump**); *Employment Div., Dept. of Human Resources of Ore. v. Smith*, 494 U. S. 872, 887, (“Repeatedly and in many different contexts, we have warned that courts must not presume to determine the place of a particular belief in a religion or the **plausibility of a religious claim.**”); *Presbyterian Church in U. S. v. Mary Elizabeth Blue Hull Memorial Presbyterian Church*, 393 U. S. 440, 450 (1969); *Ben-Levi v. Brown*, 136 S. Ct. 930, 934, See, *Holt v. Hobbs*, 574 U.S. 352, 352. I am not required to make what is clear to me, clear to Defendants or the Courts. The Courts must merely believe my faith and beliefs are genuine, a fact to me, as alleged. They do not have to agree with my religious beliefs, merely believe I believe God as I pled, as a fact to me. Defendants also seek to appoint counsel for me, at my expense, when I am impoverished, and going into debt is against my religious beliefs, and appointed counsel is against my religious beliefs, as I believe God is my advocate in the disciplinary case. (D.I. 10, regarding debt violates my religious beliefs). I must stand or fall on my faith. I will allow the holy spirit to be my advocate. An attorney advocate cannot adequately represent my religious beliefs. **(Exhibit 2)**. My faith in Jesus does not make me disabled, even if Defendants deem it irrational, including my religious opposition to mental and physical health examinations and care as stated in my complaint. D.I. 2. My poverty, while a disadvantage to me, does not make me disabled. Even the poor are afforded protection for the exercise of their First amendment rights. Our fundamental freedoms are not free if they are for sale to only those who can afford to pay to exercise civil rights. The Court erred in failing to consider the loss to the public of their loss of first amendment rights as they are in danger of being labeled as disabled for merely exercising federal rights, making the government above the Constitution and the rule of law, and the poor and those with diverse beliefs below the law. The Court erred in failing to address the loss to the public of my speech, association, potential representation, affiliation and ideas. D.I. 1-19. The

Court did not examine the facts or legal arguments pled in my complaint, or the motions, and exhibits thereto incorporated therein, for a preliminary injunction, temporary restraining order and waiver of bond, and other motions. Id. (D.I. 1-9). The Constitution and Federal laws supersede state law arguments. The court ignored superseding constitutional issues, arguments and facts related to those issues, blinding its eyes guaranteeing injustice towards me, and similarly situated parties who are not below the law by poverty or pro se status, but are afforded Constitutional protections to exercise their First Amendment rights without retaliation or interference by government agents acting under the color of law seeking to suppress or punish claimants for their exercise of fundamental liberties. The cloak of color of law by Defendants, and government agents, does not give the government lawless reign, constitutional immunity to violate the Constitution, with no accountability for such violations by using the color of the law to obstruct and prevent my access to the courts. The color of the law acts as both the sword and shield per (D.I.15 and D.I. 16), rendering the Court and the arms of the Court above the law, above the Constitution, and must be overturned to prevent clear injustice.

The Court erred by not considering or even addressing my fundamental rights and Constitutional arguments which preempt state law proceedings, and the Chancery Court's staff's and Delaware Supreme Court Chief Justice' participation in the retaliation, and intentional interference to obstruct, harass, interfere, or pressure me to forgo my case, *Kelly v Trump*, by instigating DE-Lapp and ODC proceedings against me motivated by their disdain for my personal, religious affiliated beliefs, speech reflected the same, exercise of my right to petition, poverty, association and religious exercise, and as this case may bar me from rearguing Defendants' violations of 42 USC Sections 1983, and 1985(2), and First Amendment violations



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

The evidence shows the Delaware Supreme Court justices partook in the federal law violations. The Defendants and DE-Lapp and coconspirators allege they brought the complaint due to petitions I filed with the Delaware Supreme Court. (D.I. 3, and D.I. 10, D.I. 8, De-Lapp Letter and A-4, A-5). Only the Delaware Supreme court judges knew of my petition to suspend lawyer fees for all unemployed lawyers due to the pandemic, albeit Mark Vavala knew too. Only DE Justices knew of my pleadings as no party responded. The source of the wrongful complaint against me brought to interfere and punish me for my exercise of fundamental rights and belief in Jesus appears to be rooted in the DE Supreme Court's instigation who will be complainant, judge and jury against me in a proceeding brought in retaliation and interference of my exercise of civil rights, motivated by their desire to suppress my religious associated beliefs. It is injustice guaranteed as the Supreme Court appears to have partook in federal law violations against me. It would be improper for me to name the Court as a party since I had a case before them, but it appears the Court seeks to sue me, and I no longer have a case before them. They may interplead if they so desire instead of wasting resources, although I prefer not to sue the court, only to protect my fundamental rights, especially to exercise my faith in Jesus. (Exhibit 3). The Court erred as a matter of law by indicating I could receive relief in state court, where no relief is afforded as the Chancery Court and Supreme Court participated in the facts that are the subject of this dispute, forcing Procedural and Due process violations and eliminating my access to the only court who may afford me relief, the District Court. Defendant is the initial judge, while I can argue illegality as a defense, Defendant and the coconspirator Court would wrongly grant immunity to any action I would have brought in state court, giving themselves power to be

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

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

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

My letter to the Delaware Supreme Court, which may have been reviewed by all members of the Delaware Supreme Court is the reason why DE-Lapp alleged they instituted proceedings to investigating me under the guise of offering help, since all fees were paid, possibly to cover up the letters I petitioned to Master Griffin. Thereafter, Defendants received Delaware Supreme Court filings, and allege this is the reason they seek disciplinary proceedings. How did they get them? Not through the unserved Defendants, but likely through the members of the Court or through their agents. The prosecutor must not be the judge in my claims for relief for Defendants' retaliation against me for the exercise of my protected rights, and for interference with my case, Kelly v Trump. I do not ask this court to conduct a disciplinary proceeding, merely to determine whether the Defendants conduct alleged in my complaint, and the proceeding itself are violations of the laws I alleged in my complaint, to prevent the persecution against me by government agents, and the precedent endangering others of loss of protected freedoms by government agents.

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

Dated November 2021

Respectfully submitted,

---

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

# Exhibit I

(District Court DI 21, dated November 8, 2021, filed November 9, 2021)

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

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

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

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

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

I am in immediate danger, and was required to send the Motion for reargument, on Saturday before noon to alert the court in hopes to prevent immediate irreparable injury to me and the public, on arguments I am likely to win under 42 USC Sections 1983, 1985(2), 1988 and the First Amendment applicable to Defendants pursuant to the Fourteenth, with no harm to Defendants, where Defendants' interests do not meet strict scrutiny, allowing them to persecute me based on my beliefs in Jesus Christ. I had to send it regardless of typos, without opportunity

to correct to prevent immediate, irreparable injury to me, and continuous irreparable injury to me.

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Defendants threaten me with the fires of hell.

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

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

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

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

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

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

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

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

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

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

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

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

Wherefore, I respectfully request this Court grant my order.

Dated November 2021

Respectfully submitted,

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



# Exhibit J

(Amended Motion for reargument at dismissal DI 21-2 pages 13-24 of 38 pages, dated November 8, 2021, received November 9, 2021)

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

Plaintiff's Amended Motion for Reargument

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

Dated November 2021

Respectfully submitted,

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

# Exhibit K

(DI 34-35 of Kelly v Swartz Delawares District Court dated January 10, 2022, docketed January 11, 2022)

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

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

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

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

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

loves.<sup>4</sup> I believe experts are rendered above the law by adherence to controlled conformity across the board which stifles improvements by freedom of thought and speech, hindered by libel laws, and defense of adherence to professional standards, delegation of duties or ignorance. I believe, fundraising, donations and government funding controls and limits what alleged experts learn, to serve lawless business greed not good, untamed by the rule of law or God's law of love. Our libel laws prevent free speech, debate and criticism to serve business greed. (D.I.4 at Ex 54 to F). Defendants allege my belief in Jesus Christ is illogical, and compel me to conform to the world, when I am commanded to be set apart, holy, or risk losing my ability to "buy and sell" by taking my license to work as an attorney.<sup>5</sup>

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

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

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

<sup>5</sup> *Rev.* 13:17, *Ro.* 12:2, *Nu.* 23:9, *Heb* 12:14. Work is not the sin. When your desire for money drives out your love for God and one another, at the cost of human sacrifice, harming others to serve greed, that is sin. The Free exercise Clause permits me to worship or not according to the dictates of my conscience no matter how unreasonable my religious beliefs may be to the state, not the forced worship of business greed, money and material gain by barter or exchange.

*alias* executive orders that join the state and religion by partnerships through pay through barter or exchange under the deception of charity to perform government-religious business, and two petitions relating to my request for relief on attorney license dues.<sup>6</sup> I sued the President to abolish executive orders that pay churches to perform government business under the guise of charity. It is business, not unconditional charitable love. This is a step to eliminate governments' function of welfare, eliminating social security and other government welfare programs, allowing lawless greed to reign by entities without hearts who have no power to do good, as individual humans may through unconditional love.<sup>7</sup> These entities, will not be tamed with just laws or the law of love written on the hearts of man, should the Courts not prevent or reverse the global schemes. I read the plans the *Fourth Industrial Revolution* and the *Great Reset*. (D.I. 9 at Ex. 6, 8, 9). There is a plan through unjust policies to eliminate private property and make everything and everyone no longer free, but for sale to be rented out. *Id.* Schemes may be undone by the Courts before the courts governing power is eliminated by design through privatization and automation. The Court is my hope of a hero.

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

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<sup>6</sup> (DI. 1-17, See especially, D.I. 4 at US Ex., Petition before the US Supreme Court, Ex. A-4 To App E, Ex. A-5 to App E, Ex 2-8 to App F., D.I. 3, with focus on District Court Ex. 11-13, 21-25, D.I. 7, Ex. 1-10).

<sup>7</sup> (D.I. 2, D.I. 3, D.I. 4, at Ex A and Ex 2 of Ex F).

before the US Supreme Court at the time. (D.I. 16, D.I. 9 at Ex. 5) (Ex. A). This Court overlooked the Defendant's reference to the **Delaware Supreme Court's pleadings** as the asserted reason Defendants interfered with my active case, and retaliate against me for exercising protective activity, and evidence of the Delaware Supreme Court's participation in retaliation against me for the exercise of fundamental rights.<sup>8</sup> The Delaware Supreme Court is an improper forum to determine whether the Defendants conduct against me is unlawful as a matter of law under the procedural and substantive Due process clause pursuant to the state actors and entities via the 14th Amend. and under 42 USC §§ 1985(2), 1983, and 1988, the Equal Protections Clause for disparate treatment, and the 1st Amend. applicable to the state via the 14th Amend., and arguably 28 U.S.C.A. 605, and analyzing a full and fair opportunity to be heard by considering the analysis of (28 USCS §§ 455 (b)(1), 455(b)(5)(iv)).<sup>9</sup>

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<sup>8</sup> (emphasis intended); (D.I. 3, Ex 13 Jan 7 petition relating to attorney fees); (D.I. 4, US Ex App B, Ex A-4, A-5, Ex A of Ex. F, referring to the complaint and two motions relating to second petition relating to attorney fees, App E and F, Briefs).

<sup>9</sup> See, *Davis v. Jones*, 506 F.3d 1325, 1330 (11th Cir. 2007) indicates this statute only applies to the **federal courts, not state courts**. The statutes analysis is useful in a procedural due process analysis regarding impartiality and a fair trial, as applied to me. The Third Circuit in *Johnson v. Carroll*, 369 F.3d 253, 259 (3d Cir. 2004) indicates, "28 U.S.C. § 455 [is for federal judges] and not on direct precedent related to the [state] trial judge's appearance of bias." This is distinguished from my case since it dealt with Section 455(a), not section 455(b)(1) and (5)(iv) as I plead. Appearance is not enough for the Third Circuit which is praise worthy because the individual justices are concerned with actual justice, under the facts, not the marketing or popularity of justice as a business).

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

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



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

The Court also overlooked the facts indicating the Delaware Supreme Court incited or participated in the conduct in interference of and in retaliation of my exercise of Constitutionally protected conduct which is the subject of this dispute, and cannot be the judge of its own relevant conduct or participation relating to this matter, where I am not only seeking equitable relief, but I sought damages for emotional distress.<sup>10</sup> I believe I developed the shingles as a result of this case on or around January 3, 2021 too.<sup>11</sup>

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

<sup>10</sup> (D.I. 2, at pages 8-9, 12-13, 48-52, 59, 68, 70, 71-74, 101,103); (Ex. B attached, Ex. B 2, attached, evidence of harassment to intentional increase emotional distress); (DI. 3 at Ex 1, 2, 3); (D.I. 20, D.I. 21 at Ex. 2, please note I was trembling at the forced violation of my religious belief that a police officer made a wellness check, per D.I. 21. Also note the pleadings relating to the physical threats to my safety based on political-religious association or speech at D.I. 1, D.I. 4, at US Ex. A-4, A-5, US petition of writ of cert, US-Ex. 52, not attached).

<sup>11</sup> D.I. 2 page 103. I would also like to include nominal damages, to protect fundamental rights including the right to worship or not according to the dictates of our own conscience, not the dictates of the government. Since this right is more important than money, and is not something money can remedy. Freedom is not for sale by barter or exchange.

The entire Supreme Court may have reviewed my request to suspend active attorney license registration fees for lawyers facing economic hardship during the pandemic, and my second request for relief relating to attorney license registration fees. De-Lapp, an arm of the court, claimed their interference with my active case, was because I petitioned the Court for relief from attorney dues.<sup>12</sup> De-Lapp, an agent of Defendants, was not going to help me. (Ex. C). I already paid the fees. They sought to gather evidence against me, to punish me for my exercise of fundamental rights, including the right to petition the court regarding attorney dues. It appears the Delaware Supreme Court justices or agents incited the arms to attack me by providing the information to DE-Lapp. I made a request for Chief Justice Collins J. Seitz, Jr. to recuse himself. *Id.* So, he did not participate in *Kelly v Trump*. Three Delaware Supreme Court Justices participated in the matter which is a source of Defendants' unlawfully motivated petition against me, Justices, Vaughn, Traynor and Montgomery-Reeves. (D.I. App A, App B); (Ex. D).

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

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<sup>12</sup> (D.I. 9 at Ex 1, De-Lapp's letter); (D.I. 3, Ex 13 first petition relating to attorney license fees); (D.I. 4, US, Ex A-4, A-5, relating to second petition relating to license fees).

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

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

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

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

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

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

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

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

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<sup>13</sup> The Preliminary Investigative Committee can be removed from my complaint, as the injunctive relief sought is now moot. Additionally, should defendants David White and Kathleen Vavala abstain from involvement I will stipulate to their removal from the complaint, but I do not waive my one free Amendment of complaint before service to Defendants on this.

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

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

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

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

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

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

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

Respectfully submitted,

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

# Exhibit L

(DI 34-35 of Kelly v Swartz Delawares District Court dated January 10, 2022,  
docketed January 11, 2022)

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

**EXHIBIT A** First Page of Defendants letter to me dated, August 23, 2021, showing the reason for the law suit against me to retire my license was the Delaware Supreme Court pleadings too.

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

**EXHIBIT B 2** Letter Dated December 1, 2021, regarding harassment by Defendants, regarding my Answers were sent with confirmation, and resent, and additional facts relating to the case

**(Internal exhibits) Exhibit 1** return receipt confirmation, and receipt.

**Exhibit 2** Electronic signature item was delivered

**Exhibit 3** Email dated November 30, 2021, to Defendant regarding confirmation of Answers, and my religious objection to Ms. Miss and Mrs., Jesus teaches us not to use titles

**Exhibit 4** Email dated November 28, 2021 responding to Defendant about physical delivery, not delivery through email.

**Exhibit 5** Receipt and return receipt of the second set of answers I spent hours printing out, and paid postage, dated November 30, 2021

**Exhibit 6** Email from Defendant indicating November 30, 2021 they received the answers, which is a lie, since I did not mail out the second set until this date, and the confirmation indicates it was delivered November 22, 2021

**Exhibit 7** **November 6, 2020** to Master Patricia Griffin in the Delaware Chancery Court relating to *Kelly v Trump*, regarding the Court's staff booby trapped me and my concern about Trump inciting an insurrection as an excuse to kill his own people to stay in office under a national emergency, a civil war, with attached statutes regarding the President's authority to use force against his own people in an insurrection, and newspaper clips where force was used or allowed by President Trump, when might makes wrong, not right.

**(Attached) (Exhibit A)** 10 USCS Sections 252, 253, 254

**(Exhibit B)** Newspaper article, New York Times, *Armed Agents are allowed to oversee ballot-counting venues*, by Katie Benner, 11/5/2020, Business Insider,



*Federal officers sent to Portland by Trump teargassed protesters, despite being told to leave by the mayor and governor, dated 7/17/2020*

**EXHIBIT C** Email and letter from arm of the Delaware Supreme Court De-Lapp, threatening me for my petition to the Court for relief on attorney license dues.

**EXHIBIT D** First page of an Order by the Delaware Supreme Court dated July 7, 2021, in *Kelly v Trump* by Justice Vaughn, Traynor, and Montgomery-Reeves

**EXHIBIT E** Letter to the Court, dated November 23, 2021, regarding my intent to object on subject matter grounds, and reasons the Court does not have subject matter.

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

**EXHIBIT G** Letter Motion to the Board, dated **December 18, 2021**, regarding intent to object to appointed counsel, request to postpone hearing, request time for discovery and a determination on counsel

**EXHIBIT H** *Respondent Meghan Kelly's Motion for Reconsideration of Order dated December 13, 2021, appointing counsel despite my Notice of intent to object, and objection of improper service of the Board's notice of hearing*

**(Internal Exhibits) Exhibit 1**, the Delaware Supreme Court Order relating to Counsel, dated **December 13, 2021**

**Exhibit 2**, Letter from Appointed Counsel and Notice of a hearing dated **December 10, 2021**, received indirectly by email **December 17, 2021**

**Exhibit 4** Email to appointed counsel after I declined forced representation concerning another idea for the court to entertain.

**Attachment to Exhibit 4**, Five Articles of Impeachment I proposed and contacted all 541 federal law makers about

**Exhibit 5**, the In Forma Pauperis which discussed the Delaware Supreme Court's behavior and the burden this petition has upon me from preventing me from rejoining my old law firm where I would be performing real estate settlements and using the company car. So, I could give the car my parents gave me back. My dad needs a car.

**Exhibit 6** Email to Attorney Generals regarding DE Supreme Court concerns, and religious beliefs

**Attachments to Exhibit 6, Exhibit 3**, Email to the Delaware Supreme Court regarding forced violation by swearing in without honoring my request to affirm

**Exhibit 4** Letter to family court regarding performing family law violates my religious beliefs

**Exhibit 5** (Not included) regarding judicial partiality was not included though attached and cited in the Email of Exhibit 6. I included it in another exhibit to the Motion for rearmament, Exhibit 8.

**Exhibit 6** My E-mail directed to Senator Carper regarding using words not weapons to defeat ISIS/ conduct the government performs by funding charities which funds ISIS/evil under the guise of good/charity to reward violence/ using education to prevent leaders from using government established religion for their own vanity.

**Exhibit 8** Proposals sent to law makers to prevent oil drilling. Revelation 11:18 provides, there will be a time to "destroy all who have caused destruction on the earth."

**Exhibit 2** My lawsuit against the democrats to allow me to run for office without violating my religious beliefs by forcing me to collect donations or signatures in violation of Matthew 6:1-4.

**Exhibit 7** E-mail to Attorney Generals regarding Delaware Supreme Court partiality concerns, objection to counsel as compelled forced violations of my religious belief, and other concerns.

**Exhibit 8** Letter to the Delaware Supreme Court, dated October 1, 2012, regarding Judicial partiality and religious beliefs regarding preventing partiality in the courts

**Exhibit 9** Letter dated November 22, 2021 to DE Supreme Court providing notice of intent to object to appointed counsel

**Exhibit 10** Communication to my former employer, as recent as August 6, 2021, before the August 23, 2021 threatening letter.

**EXHIBIT I** Letter to the state court, dated December 21, 2021, concerning I declined representation from counsel, per attached letter to appointed counsel, and requested the court honor my motion. For reconsideration of the order dated December 13, 2021 appointing counsel, despite my objection.

**EXHIBIT J** Letter to the Board of Professional Conduct of the state of Delaware and the Delaware Supreme Court, dated **December 29, 2021, two weeks from the hearing**, concerning the court's and board's determination of postponement of the hearing in the interest of justice, and status of a determination of my 6<sup>th</sup> Amendment right to self-representation.

**Internal Exhibits (Exhibit A)** First Page of the Office of Disciplinary's April 23, 2021 letter indicating the Supreme Court's pleadings as a source of their concern.

**(Exhibit A part 2)** Page 2-3 of Defendants petition showing the reason why they bring the state law suit against me is for my religious beliefs, citing the bible as authority for my beliefs, and their inability to understand my beliefs in Jesus.

**(Exhibit B)** E-mail to Attorney Generals, dated December 16, 2021, showing my distress at appointment of counsel, in the form of tears, admissible present sense impression, putting planning to prevent an economic crash on the back burner.

**(Exhibit C)** November 23, 2021 letter to DE Supreme Court indicating I intend to object on subject matter grounds and why.

**(Exhibit C part 2)** Email to Attorney General, dated December 15, 2021, concerning PACER, and showing emotional distress, and the need to protect free exercise of religion from the forced worship of money by the state, and discussions of the planned, preventable, reversible economic crash.

**(Exhibit D)** Certificate of Service of Respondent's Motion for Reconsideration of Order Dated December 13, 2021, appointing counsel despite notice of my intent to object, and objection of improper service of the board's notice of a hearing, dated **December 21, 2021**, (This shows I gave the board a copy a day after I served opposing counsel and the Court)

**(Exhibit E)** Email to Defendant, dated **November 4, 2021**, objecting to improper service of the August 23, 2021 letter and requiring paper mailed copies, also objecting to the appointment of counsel on religious grounds, and grounds of harassment and intentional infliction of emotional distress, providing notice to the Defendant appointment of counsel uniquely upsets me, and copying loved ones for my safety.

**(Exhibit F)** Email, dated **December 22, 2021**, to Defendant opposing appointed counsel

**(Exhibit G)** E-mail dated **December 21, 2021**, to the Court, Board and Defendant, indicating I did not accept representation from appointed counsel, and requested a docket, and an attachment of the **December 21, 2021 letter** objecting to counsel, attached letter to Counsel declining representation, dated **December 20, 2021**

**(Exhibit H)** Email dated, **December 22, 2021**, E-mail to court about representation forwarding my email to counsel showing I fired him.

**(Exhibit I)** E-mail dated, **December 27, 2021**, to the court regarding concern not all documents were filed with the court, and attached docket.

**(Exhibit J)** E-mail dated, **December 28, 2021** to the Court, indicating appointed counsel did not have the documents I filed, and the Court did not send him all of the documents I sent, which may be needed in case of an appeal.

**(Exhibit K)** E-mail dated, **December 23, 2021**, to the Court regarding my religious oppositions to expert examinations, and conformation of receipt of filings, with attached filings for the Monday **December 20, 2021** Motion filed with the court and board.

**EXHIBIT K** Email, dated **Jan. 6, 2022, one week from the hearing**, I sent to the Board of Professional Conduct of the state of Delaware and opposing counsel to check on the status of my motion to postpone the hearing scheduled Jan. 13, 2022.

# Exhibit M

(DE District Court Docket Number 39, dated January 18, 2022, filed January 19, 2022)

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF’S SECOND ADDITIONAL MOTION PURSUANT TO FRCP R. 52(b), 59(e) and 60(b)(1)(2)(6) TO AMEND FINDINGS OF FACTS AND ALTER THE ORDER, DATED DECEMBER 22, 2021, BASED ON NEW FINDINGS OF FACT, TO PREVENT, CLEAR ERROR OF FACTS, CLEAR ERROR OF LAW, AND TO PREVENT MANIFEST INJUSTICE

Plaintiff, Meghan M. Kelly, pro se, this \_\_\_\_\_, pursuant to FRCP R. 52(b), 59 (e), and 60(b)(1)(2)(6) moves this Court to alter and amend the judgment of the Court in its 12/22/21 order to (1) include the availability of new evidence not available previously available, and to later the order (2) to correct a clear error of law, (3) clear error of fact, (4) and to prevent manifest injustice.

1. I also am providing notice that I will likely, to my chagrin, amend my complaint to include the Delaware Supreme Court as a Defendant and individual judges for nominal and equitable relief.<sup>14</sup> The Supreme Court incited, participated or caused the unlawful retaliatory state Court proceeding and the Delaware Supreme Court arms’ interference in my lawsuit *Kelly v Trump* on violation of 42 USC Section 1985(2). Whether the Delaware Supreme Court’s report to DE-Lapp was out of concern for poverty or a malicious purpose is in issue. A complaint was made apparently by the Supreme Court or its agent based on my petition for relief from attorney

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<sup>14</sup> I respectfully request to include nominal damages should the Court allow amendments to the complaint. See, *Freedom from Religion Found. Inc. v. New Kensington Arnold Sch. Dist.*, 832 F.3d 469, 490, 2016 U.S. App. LEXIS 14594, \*49-50. Also see, *Molina v. Pa. Soc. Serv. Union*, 2019 U.S. Dist. LEXIS 120040, \*27, 2019 WL 3240170.

dues to the arm's of the Court. (Ex. 1<sup>st</sup> A). De-Lapp, an arm of the state court, would never have attacked me, but for this petition relating to lawyer license dues, per their own admission. (D.I. 3, District Court Exhibit 13, D.I. 9, Exhibits 1, 2, 3). The Delaware Supreme Court did not grant my petition, and ignored my second petition, deeming me unworthy of the opportunity to be heard on relief from attorney dues, in potential violation of the substantive and procedural due process clause, and in violation of the Equal Protections Clause of the 14th Amend. as applied to me, a party of one, for disparate treatment motivated by my poverty, religious beliefs or exercise of fundamental rights. This Court overlooked the Delaware Supreme Court's apparent incitement of the unlawful proceeding against me in state Court by its arms, brought to punish me, but for, my exercise of Constitutional rights. I desire to protect the Courts, to protect those I seek to correct in this case. I am sad your honor did not enjoin the state proceeding to date, forcing me to add the Delaware Supreme Court and its members. My hope of a hero to preserve our union and to make it more just and freer is with the Courts.

2. I am getting sued by the government for my faith in Jesus Christ. Defendants appear to think my worship of God instead of money and material gain is a mental disability. Jesus says you cannot serve God and money. (D.I. 20, 21). ((Ex. A), Email to Defendants regarding my religious beliefs since my religious beliefs are in question), also see (Ex. C, Ex D, Ex. Ex. E, internal Ex. F, H, I).

3. I am making this Motion in addition to, not in amendment of or in replacement to the previous motion (also referred to "M1"), I made seeking similar relief, albeit with additional facts which must be included to prevent clear error of fact, of the law and to prevent manifest injustice. Since, I filed that motion served to the Court and Defendant via US Mail on 1/10/21,

new and additional facts arose which must be considered by this court to prevent manifest injustice.

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

5. On 12/29/21, I also served a letter with exhibits with both the Delaware Supreme Court and Defendant Board notifying them,

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

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



7. I have not been afforded a fair opportunity to prepare a defense, research, gather evidence, and facts and file motions I noticed the Board and Court I intended to file, after a fair investigation was allowed in conformity with the standards of Constitutional due process, 1. to dismiss the petition based on illegality of proceeding and 2. a separate motion to dismiss based on lack of subject matter jurisdiction due to the Supreme Court's participation in inciting the petition against me, but for the exercise of my Constitutionally protected rights.

8. I repeatedly, checked on the status of my motion to postpone the hearing, and opportunity to prepare a defense, and only heard back on 1/10/22. The Board indicated the hearing was on schedule for 1/13/22. (Ex D at internal Ex. B).

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

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

11. On 1/11/22, the Delaware Supreme Court swiftly granted an order denying relief based on jurisdiction. (Ex. E Internal-Ex. B).

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

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

14. On 1/11/22, the Board granted an order postponing the hearing for eight days **due to alleged illness**, a reason not included in my motion. (emphasis intended) 6(Ex. E Internal-Ex. B). The Board was aware I was not feeling well when I immediately notified them, I was not feeling well, a week earlier. (Ex. E, internal Ex J, and Ex F).

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

16. I notified the Board and ODC of my opposition to examination by health or mental health professionals based on religious objections in my Answer to the petition, and through E-mail, despite the ODC seeking to tempt me to include such an argument in a motion. (Ex. E. at Internal Exhibits G, H, I, L, M), (Ex F).

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

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

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

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

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

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

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

23. So, I made a motion, once again to suspend the hearing date, to call witnesses, and perform discovery for my defense of exercise of fundamental rights without the state's punishment for my exercise. I have the right to believe, think and exercise my faith differently than the majority. Individual liberties, such as my right to an impartial proceeding, an opportunity to be heard, adequate notice, opportunity to perform research and a defense without disparate unfair treatment, motivated by the state's disdain for my religious beliefs, are protected by Constitutional Law from government backed mob reign of controlled, conditional, conformed

lusts. I am not sitting on this, but am acting in haste to protect and assert my Constitutional rights to prevent waiver.

24. On 1/15/22, I filed a motion for immediate emergency relief, and a new motion with the Board, attached hereto, and incorporated herein in total, *Respondent's more particularized motion to suspend the hearing, scheduled for January 21, 2022 to allow me opportunity to research and prepare a defense, requesting opportunity to draft requests for admission, interrogatories and subpoena opposing counsel, Patricia Swartz, as a necessary witness in her defense, and subpoena other necessary witnesses, including but not limited to, Chief Justice Collins J. Seitz, Judge Kenneth S. Clark, Jr., due to his admission he interrogated me based on my exercise of fundamental rights incited by the ODC, and Arline Simmons, to show unconstitutional motive for this petition, to allow, the accused, respondent an opportunity to defend herself on the defense illegality of proceeding, as applied to her, motivated by disdain by the state for her religious associated beliefs and exercise of fundamental rights, and lack of jurisdiction based on the Delaware Supreme Court's apparent participation in inciting this petition against respondent.*

25. There are only 3 business days before the rescheduled hearing. I informed Defendants I am not ready, and need time to prepare a defense, to subpoena witnesses, to perform legal research and to draft motions based on additional facts found in discovery. The Defendants fail to grant me a fair opportunity to build my defense, despite my multiple requests in contravention of conformity with the requirements of a fair proceeding under the Due Process Clause. There is no legitimate or important reason for Defendants to rush this matter at the cost of eliminating my right to an opportunity to prepare a defense and at the cost of creating an

unfair proceeding in violation of the substantive and procedural Due Process Clause and the Equal Protections Clause of the 14th Amend.

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

27. “Congress, the Executive, and the Judiciary all have a duty to support and defend the Constitution.” *Salazar v. Buono*, 559 U.S. 700, 717 (2010). Defendants act above the law, and declare me below the law, by denial of Constitutional protections, motivated by disdain for my religious beliefs and poverty.

28. I will suffer continued irreparable harm if I am unable to gather testimony and facts to provide a defense of dismissal of the petition, based on subject matter and illegality of proceeding, as applied, under the facts of the case, to chill the exercise of my fundamental rights, thereby chilling the rights of others by such unconstitutional precedent. ‘The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.’” *Mullin v. Sussex Cnty., Delaware*, 861 F. Supp. 2d 411, 427 (D. Del. 2012); Citing, *Indian River Sch. Dist.*, 653 F.3d at 283 n. 14 (quoting *Elrod v. Burns*, 427 U.S. 347, 373, 96 S.Ct. 2673, 49 L.Ed.2d 547 (1976)).

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

Defendants have not met the burden of strict scrutiny to infringe upon my exercise and assertion of Constitutional rights.

30. The right for the opportunity at justice is not a guarantee. It is the right to petition the Courts, without state punishment, that must be protected. Otherwise, only the Courts may selectively apply who has rights or not in violation of the Equal Protections Clause.

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

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

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

35. I have not sold soul to hell in exchange with the license to practice law.

WHEREFORE, this court must amend findings of fact, alter the order, dated December 22, 2021, based on new findings of fact, to prevent clear error of facts, clear error of law, and to prevent manifest injustice.

Respectfully submitted,

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Meghan Kelly, Esquire  
DE Bar Number 4968  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com, ( 3,177 Words)

# Exhibit N

(DE District Court Docket Number 39, dated January 18, 2022, filed January 19, 2022)



## TABLE OF CONTENTS

**EXHIBIT 1<sup>ST</sup> A,** Letter of investigation by arm of state court, dated May 24, 2021

**EXHIBIT A,** E-mail to Defendant regarding my religious beliefs, and world economic forum founder's plan as outlined in the two books The Fourth Industrial Revolution "to entice people through temptations to make 47 percent of Americans unemployed, to use the unemployed by labeling them mentally disabled, for mad science to teach the lie the mind can be controlled through robotics and medicine."

**EXHIBIT B** Letter Motion, Dated December 18, 2021 to Board, DE Supreme Court and Defendant regarding discovery, reconsideration of counsel, and postponement of hearing due 1. to ineffective service, until after a final determination is made on counsel, and 3. Until discovery is complete, and the Receipt and postal confirmation Board and ODC received the December 18, 2022 filing on December 21, 2022

**EXHIBIT C** Respondent's Objection to and Motion to enjoin expert observation and analysis of Respondent at hearings and in discovery; notice she will move for a protective order during the discovery stage, and requests to prevent costs as going into Debt is against her religious beliefs, and

Memorandum of Law in Support and Respondent's Objection to and Motion to enjoin expert observation and analysis of Respondent at hearings and in discovery; notice she will move for a protective order during the discovery stage, and requests to prevent costs as going into Debt is against her religious beliefs

**EXHIBIT D** Respondent Meghan M. Kelly's Emergency Objections and Emergency Motion filed with both the Board of Professional Responsibility for the Supreme Court of Delaware, and the Delaware Supreme Court, simultaneously, to postpone the hearing against her to prevent manifest injustice to afford her an opportunity to perform discovery, potentially call witnesses and prepare a defense for the state's allegedly illegally motivated petition against her for her exercise of fundamental rights, motivated by the state's disdain for her religious political beliefs, dated January 11, 2022,

**Exhibit A** excluded since it is a District Court Doc.

**Exhibit B** includes internal exhibits, in one saved document

1. Email to Board and Patricia Swartz, dated Thursday, January 6, 2022, following up on motion to postpone the hearing one week from the date, to afford a full and fair trial, including an opportunity to gather evidence, so as not to violate the substantive and procedural due process clause, and an opportunity to use the evidence to present motions, including a motion to dismiss based on subject matter grounds.

2. Email to the Board and Patricia, dated Monday, January 10, 2022, follow up on status of my request to postpone the hearing.

3. Email to the Board and Patricia, dated Friday, December 24, 2021, regarding following up on my request to postpone the hearing, and the outstanding issues relating to appointed counsel verses permission to represent myself, undecided by the Court. Notice of my intention to file a Motion objecting to an expert's attendance at the hearing as against my religious beliefs, and notice of my intent to file a protective order to protect myself from examinations from mental health and physical health experts on religious grounds.

4. Email notification the Board member is out until December 28, 2021, dated December 24, 2021.

5. Email from the Board dated January 10, 2022, indicating the Board plans to move forward with the virtual hearing as scheduled, despite my appeal based on improper notice, and the need to prepare to defend my case.

6. Email to the DE Supreme Court, Board and Patricia, dated January 6, 2022, regarding the federal government is helping me with the vulture attacks.

7. Accidental duplicate of Dec 24, 2021 email, at No. 3.

8. Email to Court, dated December 22, 2021, forwarded emails to appointed counsel, firing him, and copying to others to protect my safety, dated December 21 and 22, 2021.

9. Email to Court asking for the Board's number, December 22, 2021. I was only able to leave messages.

**EXHIBIT E** Respondent Meghan M. Kelly's **motion appealing** the Order of the Board on Professional Responsibility of the Supreme Court of the State of Delaware dated, January 11, 2022, granting postponement of the hearing for 8 days due to illness, not a reason identified in my motion to grant postponement to afford me opportunity to prepare a defense, perform discovery, research, file motions, be heard on outstanding motion(s) unaddressed by the Board, to defend my exercise of fundamental rights and to preserve my license to practice law, on the grounds the amount of time is not enough and a hearing date must be postponed until after a fair opportunity to build a defense is granted, and moves the court to suspend a hearing date until the parties and the Board determine a fair opportunity to perform discovery has been allowed so as not to violate the norms of a fair proceeding, displaying disparate treatment towards respondent based on her unique religious political beliefs, in violation of the Equal Protections clause applicable to her as a party of one, **dated January 12, 2022.**

**(Internal Exhibits) Exhibit A** Respondent Meghan M. Kelly's Emergency Objections and Emergency Motion filed with both the Board of Professional Responsibility for the Supreme Court of Delaware, and the Delaware Supreme Court, simultaneously, to postpone the hearing against her to prevent manifest injustice to afford her an opportunity to perform discovery, potentially call witnesses and prepare a defense

for the state's allegedly illegally motivated petition against her for her exercise of fundamental rights, motivated by the state's disdain for her religious political beliefs, dated January 11, 2022

**Exhibit B** The Delaware Supreme Court Order Denying my emergency objections and motion to postpone the hearing.

**Exhibit C** The Board Order granting a postponement of the hearing to the date January 21, 2021, "due to illness," a reason I did not request.

**Exhibit D** Email to Patricia Swartz, dated January 3, 2022, regarding I am not feeling well, took a covid tests, amd negative, but believe I am developing the shingles.

**Exhibit E** Email to Board, Lisa at the Supreme Court and Patricia Swartz regarding still sick, problems with phone, and vulture issue at home, which may interfere with scheduling, also attached pictures of the vultures that chase me and peck at the glass windows, and do not go away when I yell at them.

**Exhibit F** Email from the Board dated January 10, 2022, responding to my most recent request on my motion to postpone the hearing indicating "The Board plans to move forward with the hearing as scheduled

**Exhibit G** Email To the Board and Patricia, dated December 24, 2021, regarding

1. I received docket ending before December 21, 2021,
2. Told the Board I would send them my November 19, 2021 answers to the petition via email for ease,
3. Indicated the Board is aware of my request to postpone a hearing date so I may properly defend my exercise of Constitutionally protected activity from state retaliation, but for the exercise of fundamental rights, requiring the government to bear the burden of strict scrutiny.
4. I told the Defendants I intend to file a motion objecting to an expert's attendance at a hearing, as it is against my religious beliefs. I am a child of God, not a scientific object for observation and examination by health or mental health examiners who play God by seeking to mold people like me to scientifically conditioned and conformed dictates instead of protecting the individual's dictates of conscience. Experts deem those whose will does not bend with temptations to adhere to the communally accepted trendy molds as unfit. My God teaches me those who are conformed to the world do not have eternal life and will be unfit for heaven, should they not repent.
5. I also told the Defendants I will likely file a protective order to protect myself from examination from mental health or physical health experts on religious grounds, should petitioner seek an examination. My exercise of fundamental rights,

including exercise of my religious beliefs, requires the state meet strict scrutiny, which it is not likely to meet.

**Exhibit H** Emails dated January 11, 2022, email from Patricia Swartz to Board and me, objecting to postponing the hearing, and my responses, including my right to believe differently than the majority, and my religious objections to healthcare.

**Exhibit I** Email January 11, 2022, my email responding to opposing counsel, providing religious objections to healthcare and my religious beliefs, my disagreement with many democrats on healthcare when I ran for office in 2018, and a sign healthcare that cares not healthcareless, your health is your wealth, as I was still under the weather.

**Exhibit J** January 4, 2022 email to Court, Board and Defendant regarding I wasn't feeling well. The covid test was negative, but looks like I developed shingles.

**Exhibit K** Email, dated January 5, 2022, relating to a broken phone through the federal government

**Exhibit L** Email dated December 31, 2022, to the Board of motion, *Respondent Meghan M. Kelly's objection to and motion to enjoin expert observation and analysis of respondent at hearings and discovery; notice she will move for a protective order during the discovery stage; and requests to prevent costs as going into debt is against her religious beliefs; Memorandum of law in support of this motion, certificate of service, postal receipt, table of contents of the exhibits, and exhibits thereto contained, dated December 31, 2021*

**Exhibit M** Emails January 12, 2022, regarding I was not making a new motion merely because I communicated with the Board and Defendant I desired time to afford a fair opportunity to prepare a defense.

**Exhibit F** Answer to petition, excluding exhibits.

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

**(Internal Exhibits) Exhibit A** Post Office Receipt, and certified mail receipt and confirmation the December 18, 2021 letter motion requesting opportunity to perform discovery and file motions to dismiss was received by the Board and ODC on December 21, 2021

**Exhibit B** Postal Receipt for December 29, 2021 letter to Court, Board and ODC, dated December 29, 2021

**Exhibit C** Emails to and from Patricia regarding moot motion

**Exhibit D** January 12, 2022 email correction to Motion filed January 12, 2022, the federal government is helping me with the vultures, forwarded email from the Federal government representative.

**Exhibit E** Email to and from federal government official relating to the fact there is no charge for federal assistance with elimination of vulture problem, so as not to violate my religious beliefs.

**Exhibit F** Email filing dated Thursday, January 13, 2022, motion to expedite motion to appeal with the Delaware Supreme Court.

# Exhibit O

(Kelly v Swartz et al. DE District Court DI 36, dated January 19, 2022, filed January 19, 2022,  
also filed on January 21, 2022)

U.S. DISTRICT COURT, DISTRICT OF DELAWARE

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

**PLAINTIFF MEGHAN M. KELLY'S 3rd EMERGENCY MOTION PURSUANT TO  
FRCP R. 52(b), 59 (e), 60(b)(1)(2)(6), and 65**

AND NOW this 1/19/22, respondent, Meghan M. Kelly, pro se, files emergency motion to pursuant to FRCP R. 52(b), 59 (e), 60(b)(1)(2)(6) and 65 moves this Court to alter and amend the judgment of the Court in its 12/22/21 order to (1) include the availability of new evidence not available previously available, and to later the order (2) to correct a clear error of law, (3) clear error of fact, (4) and to prevent manifest injustice.

1. Since yesterday, January 18, 2022, after I served a second emergency motion pursuant to pursuant to FRCP R. 52(b), 59 (e), and 60(b)(1)(2)(6) additional facts must be presented and considered by the court to prevent manifest injustice, and to allow for relief this court Plaintiff already requested pursuant to FRCP R. 65 in her motions for a preliminary injunction and temporary restraining order. (D.I. 6, 7, 8, 9, 10, 11, 33) (Ex. A, Return receipt of January 18, 2022 motion served to the court).

2. The Defendant Board rendered a decision, attached hereto, denying me of the right to subpoena witnesses, cross examine witnesses, and present evidence, by denying her ability to collect the same, in defense of my exercise of fundamental rights without state interference and punishment by bringing the petition against me, but for my religious beliefs and exercise of fundamental rights including the freedom of conscience to think, believe, exercise

religious beliefs, speak based on her beliefs, petition the courts, and associate. (Ex B, informal decision along with critical emails)

3. The State has brought a petition against me for my faith in Jesus Christ. Defendants appear to think my worship of God instead of money and material gain is a mental disability. Jesus says you cannot serve God and money. I believe people go to hell for organized charity, pro bono, fundraising, forcing individuals to work as discipline in violation of the 13<sup>th</sup> Amend., and **blindly** doing what they are told at a job for money to care for their family, while not caring to **see clearly to love God** as God, instead of money as savior and God, and not caring to **see clearly** to love others, by understanding how their product or service may harm others God loves.<sup>15</sup>

4. On December 13, 2017, the Delaware Supreme Court appointed counsel despite having notice of my objection.

5. I experienced emotional distress relating to this government compelled violation of my religious belief and filed a number of papers before the Delaware Supreme Court granted me permission to represent myself on December 30, 2021.

6. Prior to that date, I filed a motion for time to prepare a defense, research and perform discovery to determine which witnesses to call.

7. I followed up numerous times with the Board on the status of my motion, but it was not until January 10, 2022, that an indirect determination was made. The Board ignored my motion, escaping an appealable order to deprive me of an opportunity to be heard in violation of the substantive and procedural due process clause, arguably basing their disparate treatment towards me, by partiality towards the state, demeaning my religious beliefs, religious exercise

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<sup>15</sup> (Emphasis intended, See, *Jn.* 12:40, *Lk.* 11:34)



and exercise of the right to petition, and associate and speak, as unworthy of protection in violation of the Equal Protections Clause, and the Due process and substantive due process clause of the 14<sup>th</sup> Amend. (Ex B).

8. On January 11, 2022, I filed an emergency motion, simultaneously with the Board and Delaware Supreme Court, appealing the refusal of the Board to afford me an opportunity to prepare a defense, gather facts, research and perform discovery.

9. The Delaware Supreme Court denied my appeal, since the unofficial decision rendered by the Board maliciously designed to prevent a fair opportunity for me to be heard and appeal, was not deemed a final appealable order by the Delaware Supreme Court.

10. The Board rendered an order later on January 11, 2022.

11. Without delay, I appealed this order with the Delaware Supreme Court on January 12, 2022.

12. The next day, January 13, 2022, I filed a motion for an emergency immediate decision on my January 12, 2022 appeal.

13. The following day, January 14, 2022, the State brought an answer to a motion rendered moot to harass and distract me, knowing I argued I did not have enough time to prepare and present a defense, with no opportunity for discovery or to call witnesses.

14. The day after that, Saturday, January 15, 2022, I served a different motion with the Board to call specific witnesses, requesting subpoenas, and additional time to send Requests for admissions and interrogatories to Defense Counsel, which are necessary for my defenses to this case, the illegality of the proceeding as applied, motivated by the state's desire to punish me for my exercise of protected conduct in contravention to the First Amendment applicable to the State pursuant to the 14<sup>th</sup> Amend., and in violation of the Equal Protections Clause by disparate

treatment towards me based on my religious beliefs and poverty, deeming me unworthy to be heard and unworthy of other Constitutional rights.

15. Immediately after the holiday weekend, two business days after my appeal, on Tuesday, January 18, 2022, the Delaware Supreme Court denied my appeal, which was based on protecting my fundamental rights. (Ex C., attached Order, dated January 18, 2022, Ex D, prior Order of the Supreme Court, dated January 11, 2022, Ex F, prior order of the Board, dated January 11, 2022).

16. My defense of subject matter jurisdiction is based on the Delaware Supreme Court's participation in inciting the illegal proceeding, as applied.

17. On my January 15, 2022 motion filed with the Board, , I noted the court's apparent participation, and the need to cross examine Chief Justice

18. The Court maliciously indicated, indirectly the right to a fair, impartial, opportunity to be heard, opportunity to defend basic liberties was somehow frivolous, to allow the lawless reign of lusts, their will be done, instead of honoring the Constitutional protections afforded to me, the least of these, in violation of the Equal Protections Clause, and substantive and procedural due process clause. (Ex. C)

19. The Delaware Supreme Court is depriving me of an opportunity to be heard and a fair trial. The Board denies me the right to prepare a defense, to subpoena witnesses, and cross examine necessary witnesses. This is not a lawful proceeding. This is my hanging but for my belief in Jesus the Christ. I am in great immediate danger.

20. The Court indicated it would not hear any frivolous motions, giving a colluding sign to the Board not to file an official order, to prevent my opportunity to be heard on appeal.

21. On January 18, 2022, the Board rendered a decision, while not placing the decision in an official Order with the intent to deprive me of the opportunity to be heard on appeal. (Ex. B).

22. An unlawful secret proceeding is scheduled against me on Friday, January 21, 2022, with the purpose to punish me for exercising my religious beliefs, speech defending the exercise of such beliefs without government sponsored burdens, and petitions relating to my exercise of fundamental rights, and my associated rights as a Christian, as an American and as an attorney to believe in Jesus Christ without compromise, and without sacrifice of fundamental rights or my license to practice law. (Ex B)

23. The Supreme Court appears to be conspiring with Defendants to punish me in violation of 42 USC Sections 1983, 1988, and in potential violation of 1985(2), with intent to harass and interfere with my assertion of Constitutional rights, by depriving me of a fair opportunity to be heard.

24. The Court and its members must be included on the Complaint as necessary Defendants, including Chief Justice Collins J. Seitz, Jr., Justice Traynor, Justice James T. Vaughn, Jr., and Justice Tamika R. Montgomery-Reeves. The latter three reviewed and rendered orders in *Kelly v Trump*. I seek equitable relief and nominal relief for deprivation of my constitutional rights.

25. I am grateful I informed the Court of my intent to add the Delaware Supreme Court and its members as Defendants, prior to receipt of the January 18, 2022 state Supreme Court order by service of my Motion, *Plaintiff's Second additional motion pursuant to FRCP R. 52(b), 59(e) and 60(b)(1)(2)(6) to amend findings of facts and alter the order, dated December*

*22, 2021, based on new findings of fact, to prevent clear error of facts, clear error of law, and to prevent manifest injustice, incorporated herein by reference in its totality.*

26. My intent is now cemented by the great injustice towards me, and injustice towards all Americans by disparate selective application of who is worthy of Constitutional rights, by denial of my rights merely because they disagree with my personal beliefs.

27. In America I am free to believe differently, even have beliefs others find repugnant, or unsound. In America I should be free to worship Jesus Christ without sacrificing fundamental rights, and without sacrificing my paid for active license to practice law.

28. On October 26, 2021, I asked a Court representative, Renee Buskirk, to ask the Chief Justice whether he filed a complaint against me to get De-Lapp and the ODC, in hopes to get an affidavit to prevent the need to subpoena the Chief Justice as a witness. (Ex. B)

29. To my horror, I discovered Renee appeared to work for Defendant, ODC, as I later discovered her on an email with the Defendants. (Ex. F)

30. The Defendants knew of my desire to question Chief justice and other witnesses. I asked for opportunity to perform discovery in hopes to gain answers in a gentler form than subpoenaing witnesses. (Ex. B) However, with the recent denial of the Board on January 11, 2022, and denial of the appeal to the Supreme Court, dated January 18, 2022, I had no choice but to act in presumptive haste by filing a motion on January 15, 2022 to subpoena witnesses to cross examine during the state court hearing.

31. The Delaware Supreme Court's assertion relating to ignoring frivolous appeals, while not calling the appeal frivolous is a signal for the Board not to render an order so as to deprive me of the opportunity to be heard on appeal.

32. The Delaware Supreme Court's assertion that having an opportunity to prepare and present a defense based on 1. illegality of proceeding as applied, and 2. lack of subject matter jurisdiction, due to its own incitement or participation in inciting its arms of the court to attack me, but for the exercise of fundamental rights, is unworthy of consideration, is clear evidence of its inability to be impartial in my case.

33. I object to the illegal proceeding as applied. I object to the deprivations of my substantive and procedural due process rights, as applied to me by denying me opportunity to research, collect evidence and prepare a defense. I objected to lack of notice and the form of notice provided as insufficient by the Board for any hearing. I objected to the denial of my right to cross examine and present a defense in violation of the 6th Amend.

34. The State must meet strict scrutiny to overcome any of my objections, which it cannot meet, rendering these violations of my Constitutional rights unexcusable.

35. I am incredibly disappointed in the lawlessness exhibited by the state.

36. I also objected to the closed proceedings, and requested the proceeding be conducted in open court to protect me from secret, concealed collusion from the state to let their will be done, instead of applying limitations on the state with the rule of Constitutional law.

37. On January 18, 2022, I filed a different motion with the Court, the Court is scheduled to receive today with information that I include and incorporate herein by reference in its totality.

38. I do not waive my motions to exemption of PACER fees, but am filing this now, so as not to violate a greater sin against God by failure to assert my rights. Not all sins are weighted the same per Jesus the Christ. (*Matthew 23:23*). Injustice in the courts is damnable per God, by loving costs, convenience and comfort more than God or one another. (*Amos 5:15*); (*Also see, Isaiah 10:1-2* “Woe to those who enact unjust statutes and issue oppressive decrees, to

deprive the poor of fair treatment and withhold justice from the oppressed.” Whenever God says “Woe to you” I believe it means damned to hell are you should you not repent by unhardening your head and unhardening your hearts to love to overcome lusts that lead to the second death.).

Wherefore I pray the Court grants my motion to appeal and immediately reconsiders my motions for a temporary restraining Order and preliminary restraining order to enjoin the hearing scheduled January 21, 2022.

Dated Jan. 19th, 2022

Respectfully submitted,

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Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
Unrepresented indigent party,  
Not acting as attorney advocate  
Bar No. 4968  
(Word 2, 237)

# Exhibit P

MEGHAN MARIE KELLY, ESQUIRE

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34012 Shawnee Drive  
Dagsboro, DE 19939

**The Honorable Colm F. Connolly  
Care of the Clerk of Court  
Office of the Clerk  
United States District Court  
844 North King St Unit 18  
Wilmington, DE 19801-3570**

**RE: / Kelly v Swartz /doctored praecipe/ concealing elimination of key witness by retiring Arline Simmons and Katrina Krugar/ Free speech argument ruling that DRDC Rules 12 and 13 are unconstitutional per se and as applied**

April 26, 2022

Dear Honorable Colm F. Connolly:

On Friday, April 22, 2022, with a heavy heart, I went to the Chancery Court in Sussex County to pick up the attached praecipe, dated October 5, 2022, labeled as **Exhibit A**. A Chancery Court staff member, Arline Simmons wrote on the praecipe, without my authorization, testifying as a witness without cross examination, on a public court record, misleading courts on appeal, which contributed to the confusion as to why I could not serve US Attorney General, David Weiss in *Kelly v Trump* Chancery Court No. 20-0809, DE Supreme Court No. 119-2021, and United States Supreme Court No., 21-5522.

I did not know Arline Simmons wrote on it, and could not understand why I was not issued the Summons for the First Amended Complaint or the Second amended Complaint for local counsel, US Attorney General David Weiss, through the civil process clerk. The handwritten notes give some clarity.

Per the attached exhibit, incorporated herewith as **Exhibit B**, I wrote a letter dated July 12, 2021 and filed with the Delaware Supreme Court, upon discovery that the Civil Process clerk's address was crossed off. Arline Simmons, flipped through the documents and instructed



me to cross off the address, with initials. I complied, thinking she may have found a typo, not knowing this would prevent service to the Civil process clerk.<sup>16</sup> In tears I lamented, “I was booby trapped by the Court staff Arline Simmons.” Attached, please find **Exhibit C**, the praecipe to serve Delaware local counsel, through the Civil Process clerk, with the address crossed off and my initials, through the instructions of Arline Simmons.

The signature pages were apparently switched. See **Exhibit D**, the praecipe with the switched signature page.

I did not understand why no subpoena was issued to me for the Civil Process clerk. Per **Exhibit E**, attached hereto, in a letter dated, October 19, 2020, I wrote Master Patricia Griffin regarding inter alias, that Defendants had 60 days to respond to my complaint as opposed to 20 days like a normal person, since they were agents of the federal government. On a side note, that is unfair, granting partiality and the luxury of more time to the powerful federal government, and less opportunity for the common lay person to assert their grievances against the federal government. I also received disparate treatment by the Chancery Court staff, and noted I acted

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<sup>16</sup> I apologize that I am a poor typist. In high School I did so poorly in my typing class that I dropped out so I did not affect my GPA, which was over 100 because academic courses were weighted. My little brother, Andrew Patrick Kelly was valedictorian, class of 98 at Indian River High School, and my beautiful big sister Amanda Elizabeth Kelly Gordines and had a better GPA than I did too. I have family of beautiful, smart successful people. I am the least of these in my family and in the eyes of the world, but I am rich in faith for God, your honor. My father is a little ugly like I am, but my dad is my hero because he does that right thing, even at a material loss. My dad, the legendary R. Pat Kelly teaches high school, used to life guard at the beach, coached football and continues to coach basketball. My dad makes doing the right thing look cool and he drove our prejudice against people of diverse races, socio-economic statuses and places of origin by using his coolness to drive out cruelty, when he taught Civics at Indian River High School, located in Sussex County Delaware. I was in Girl's State in High School only because my dad is smart. I listened to him speak of history on the car ride to school and repeated my father's captivating analysis, not mine, that dazzled my history teacher, Mr. Abbott. Mr. Abbott nominated me and Mary Wilgus. My Principal Dr. Patterson nominated me as student liaison. I had surgery in high school that made me forever weak. That is why I studied healthcare courses at Law School and a course at UD to improve our care that kills and harms and I believe damns people to hell. Just because I am poor, weak and ugly does not mean I am worthless your honor. I am priceless. I gave my life to God, not man or money that means I care about others as myself, and I cannot turn a blind eye in the face of oppression.

as a party not as an attorney advocate, to alert the court it is okay for staff to yell at lawyers, but it is prejudicial to yell at parties. Id.

In a letter attached hereto as **Exhibit F** dated November 10, 2020 to the assigned Vice Chancellor, I noted I served President Trump and William Barr the Complaint and Amended Complaint, and stated, “The US Attorney for the District of Delaware has not been served... I requested subpoenas, including the one for the civil process clerk, in a letter to the Honorable Master, dated October 30, 2020.” (**Exhibit F** at 3, and the entire document, also see **Exhibit G**, the letter to Master Griffin, dated October 30, 2020, albeit it related to time constraints and removal.)

We were in a dangerous part of the pandemic when former President Trump was diagnosed with Covid-19, and I erroneously thought William Barr also contracted Covid-19.

Despite, the perils of germ spreading to and from notaries, the Chancery Court staff required I notarize documents. So, I sought a waiver, which the Delaware Supreme Court had already granted unbeknownst to the Chancery Court staff and myself.

Per **Exhibit H**, through a letter dated, October 9, 2020 to Master Patricia Griffin, a letter dated October 7, 2020 to the assigned Vice Chancellor of the Chancery Court, and a letter dated October 7, 2020 to the Delaware Supreme Court, I requested a waiver of the notary requirements to prevent loss of life and health, and copied William Barr on these requests. <sup>17</sup>

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<sup>17</sup> Albeit your honor I made a mistake by not sending copies to local counsel, David Weiss. My mistake is not a mental disability, but based on my desire to act quickly to prevent irreparable loss in terms of government incitement infringement and loss of my First Amendment rights. I did not have easy access to research or even a working computer, or a printer at the time. I did not make the same mistake twice in this case. I served the Defendants through their local counsel, Zi-Xiang Shen, despite the fact this court withheld issuing service of the complaint and amended complaint.

The Delaware Supreme Court sent me a letter attaching the emergency order, while copying the Defendant's administrator to the Board of Professional Responsibility, Karlis Johnson. (**Exhibit I**).

Throughout this time I noticed disparate treatment towards me, based on religion, political beliefs or association or poverty in violation of the equal protections clause, by the Chancery Court staff, apparently based on religious belief, political beliefs and or poverty. Per **Exhibit J**, attached hereto, in a letter dated, December 1, 2020, I wrote the Master Patricia Griffin of the Delaware Chancery Court concerning the prejudicial treatment based on protected beliefs and activity, and attached emails to **Katrina Kruger and Arline Simmons concerning the same**. (Emphasis Intended)

On or about November 6, 2020, I wrote Master Patricia Griffin regarding her staff, Arline Simmons, misleading me to almost miss my filing deadline to appeal, attached hereto as **Exhibit K**.

I sought discovery and alerted the Defendants of potentially calling Arline Simmons as a witness in the state proceeding. To my absolute horror, as I picked up the Praecipe dated October 5, 2020, on Friday April 22, 2022, I discovered Arline Simmons and Katrina Kruger were no longer with the Chancery Court, apparently encouraged to retire to protect themselves and the Court in this federal proceeding. Albeit I did not desire to sue or harm either of these individuals. Though, Arline Simmons mistreated me, she is my friend. I desired to safeguard my ability to worship Jesus without government incited economic, social, or physical persecution for my religious beliefs in God as savior, not as money as savior.

Defendants prevented discovery concerning potential witnesses to hide the fact these two witnesses with first hand knowledge, were no longer available through the state in the Board proceeding.

I emailed Defendants I did not want Arline Simmons to get into trouble, before learning she was no longer with the Court. I merely desired the ability to exercise my constitutionally protected liberties without state persecution. I also noticed another government agent with a connection to me, Secretary of Education Dr. Celeste Bunting, retired, probably by state pressure after learning of her ties to me. **(Exhibit L)** Please note, I inadvertently sent the email, in Exhibit L, to the wrong Lisa, and meant to send it to Lisa Dolph, to end interference in my active case.

In addition, I noted Judge Smalls of the Court of Common Pleas, may have been forced to retire when the state learned, he told me to go back to Pennsylvania, not knowing I am from Delaware, showing prejudice based on place of origin. **(Exhibit L)**. He was the first judge I made an appearance before, as an attorney on behalf of another lawyer who requested I fill in for them. Please see my letter to the Delaware Supreme Court concerning partiality by judges, incorporated herein by reference at D.I. 4 Exhibit 5. (Also see, D.I. 4, Exhibits 2, 3, 4 and 6. regarding partiality towards money and convenience at the cost of injustice by the state's agents, towards religious beliefs.)

I have been devastated, reasonably emotionally distraught, at the prospect Arline and Katrina may have lost their jobs because of the Defendants desired to conceal disparate treatment by state actors towards me based on disdain for my religious, political beliefs, speech, affiliation or poverty. I did not want them to lose their job. I did not desire to sue them either. I care about them. I merely love God more than them, other people and my own life, and must assert my right

to love God without government economic, social or physical persecution. I gave my life to God your honor, not man or money.

I am also disappointed in Defendant David White, and Kathleen Vavala for persecuting me based on my religious-political petitions, speech, association and exercise. I sent them page 39 of the Fourth Industrial Revolution which includes the elimination of lawyers, as you know there is a plan to eliminate judges too, to automate justice in the decades to come. (**Exhibit M**)

David White knows I am a good lawyer. I drafted the attached pleading for an arbitration he handled upon my request for Insight Homes. (**Exhibit N**) I understand Insight retained him for other cases.

I believe the ODC's function worsens the practice of law and guarantees injustice by its focus on serving business greed not good, by focusing on what I believe is the mark of the Antichrist, partiality towards self, looking after their own, the appearance of the profession, money, convenience, positions and power, not unearned required care for the public and professionals, while protecting individual liberties from satanic mob reign of lusts. I hate it when judges in courts misbehave by feigning humility to get out of doing their duty by indicating "the people elected the President or congress, I cannot overstep by rewriting the law, or acting as executive by cry babying "political question."

The Court must balance these two imbalanced branches to protect individual liberty, the freedom of the individual from the satanic conditional conformed reign of lusts, with no ability to unconditional love. The Courts must exercise their duty to prevent the planned elimination of the dollar, the intended crash of the global economy, and the planned elimination of governments down the line. The Courts must not give into temptation to immediate gratification, ease, position, profit, only to lose it all down the line. There are plans for our Country's harm and the

world's harm. The World Government Summit met on March 29-30, 2002, and alluded to a cold war after a hot war, and a depression and much more concerning issues. If they predict it, they plan it. The World Bank and the International Monetary Fund, aka, IMF, also had their yearly meeting, April 18-24th and plan inflation. Your honor, can place his foot down on the President or Congress and prevent the planned inflation and worsening conditions to cause a crash of the dollar and world economy, albeit in another case. You are my hope of a hero, as well as the Delaware Courts, who persecute me now. Jesus says justice, with mercy and faithfulness are more important commands than laws dealing with material gain. Citing *Matthew 23:23*. God teaches partiality is sin. Justice in the courts is a command. *Amos 5:15*. You may save lives and eternal lives if you freely choose, your Honor. I hope you do.

With regards to this outside Court balancing the partiality and injustice guaranteed by self-regulation of state courts, lawyers, professional lawyer associations and Professional Disciplinary Procedures and counsel, the ODC stifles improvement and correction within by requiring training all lawyers through CLE's to equally provide poor service, seeking sameness, conformity, uniformity, not growth and learning.

As I mentioned previously in Exhibits and in my Complaint, comments of diverse suggestions for improving the practice of law, were not well received at continuing lawyer classes. The State through their agents desire "their will be done," like Satan, controlling attorneys like widgets, human commodities, not caring for them and the public. (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**." (Emphasis intended), note the reference to control, not caring for humanity while protecting their freedom to choose even choose wrongly. When we force our will upon others, that is not freedom but tyranny, albeit just laws govern, guide and correct people who kill, steal

and destroy to serve business greed, the mark of the beast, conditionally caring for your own with no unconditional love); (See also , 2 *Corinthians* 4:4, “the **god of this world** [Satan] hath blinded the **minds** of them [with enticing temptations of reward, avoidance of harm, societal peer pressure, shame, praise and conditional caring with no God in them, controlling humanity through temptations] which believe not, lest the light of the glorious gospel of Christ, who is the image of God, should shine unto them.”)

The ODC merely treats the practice of law as a business, cold hearted while feigning superficial optimism and concern to sell a product to the exploited public, while treating lawyers as human capital as opposed to human beings with souls.

The Courts provide a government service to all unearned, required, even to those with religious-political beliefs, religious-political exercise which state agents do not understand, disagree with and find repugnant, like my own your honor. Maybe your honor, may require the Board and the ODC to care for, not control lawyers, while encouraging improvements of the profession, instead of stifling innovation through conformed bad standards that exploit and oppress people for convenience and profit.

I filed the attached complaint against Judge Kavanaugh, and it appeared the ODC cowardly cared about retaliation from its ruler, the highest court, Supreme Court Justice Kavanagh, and did not improve the profession, just created a false appearance of justice. **(Exhibit O).**

The time for correction for Justice Kavanagh was during the appointment of nominees. That time has passed. Vengeance is injustice, with no room for correction that guides the misguided to become better by love, not by material gain or money. So, no impeachment should be made for him or for Justice Thomas regarding Anita Hills.

Upon learning this hard truth of the ODC's marketing function creating injustice guaranteed, I believe the Courts should not self-regulate, but should allow impeachment to be the only means of a government check. There is corruption and internal bias to look after your own at the public's expense, while creating the illusion of justice, it creates injustice guaranteed. That said, I do not desire Justice Kavanaugh or Justice Thomas to be impeached for their past errors or with regards to Justice Thomas's, his wife's conduct relating to the attempted coup on January 6, 2020. Half of the nation were misled by former President Trump's sweet nothings. Courts must guide the misguided, not punish them for being human as opposed to cold hearted machines seeking cold hard or electronic currency.

I also desire to include additional count and claim, to declare Disciplinary Rules 13 and 14 Unconstitutional, in violation of our Constitutional protections relating to free speech, and inhibiting gathering aide in my defense to accusations against me for my political-religious petitions, speech, association and exercise.

Delaware Rules of Disciplinary Procedure, Rule 13 requires:

- a) Confidentiality. Prior to the Hearing Panel's submission to the Court of its final report, and except as otherwise described in these rules, disciplinary and disability proceedings and the official record in such matters are confidential. If the Hearing Panel's report recommends that the matter be dismissed, that a lawyer not be transferred to disability inactive status, or that a private sanction be imposed, any further proceedings by the Court and the official record in the matter are confidential unless and until otherwise ordered by the Court. (b) Protective orders. Upon proper application with good cause shown, or on a sua sponte basis, the Chair or Vice Chair of the Board, the Chair of the Hearing Panel, or the Court may issue appropriate protective orders with respect to any proceedings, reports, documents, or other information which may otherwise be made public, for the purpose of preserving confidentiality. (c) Complainant's right to appear. The complainant in a disciplinary matter, if any, shall have the right to appear at any Board hearing on sanctions or any Court hearing on a petition for interim suspension relating to the matter for the sole purpose of making a statement on the record regarding the matter. (d) Requests for confidential information. A request for the release of confidential information as described under these Rules shall be made by written application, with good cause shown, directed to the Administrative Assistant. Such application shall be considered



and determined by the Court. (e) Release of confidential information. The work product of the ODC may not be disclosed or released except pursuant to Rule 13(f). The pendency, subject matter, or status of a disciplinary matter may be disclosed or released if: (1) the respondent has waived confidentiality in writing; (2) the proceeding is based upon allegations which include the conviction of any crime; (3) the respondent has been placed upon interim suspension or disability inactive status; (4) such disclosure or release is necessary to obtain the assistance of another person, agency, or organization, provided that such person, agency, or organization agrees to maintain the confidentiality mandated by these Rules; (5) the proceedings are based upon allegations which have otherwise been made public; or (6) with the approval of the Court, such disclosure or release is necessary in order to correct false or misleading public statements with respect to any otherwise confidential proceeding or information, or is necessary to prevent public confidence in the disciplinary system from being undermined. (f) Cooperation with criminal justice authorities. Any evidence or information obtained through the disciplinary process indicating criminal conduct by a lawyer, including documents, transcripts, and work product, or any selected portions thereof, may be disclosed or turned over to the appropriate criminal justice authorities for their independent review and investigation. (g) Duty of participants. All participants in a proceeding under these Rules shall conduct themselves so as to maintain the confidentiality mandated by these Rules. (Amended, effective May 14, 2008.)

Delaware Rules of Disciplinary procedure Rule 14 provides:

“The ODC shall publicly disseminate all information relating to disciplinary matters and proceedings as is consistent with these Rules. In particular, the ODC shall transmit notices and information regarding the imposition of all public discipline, transfers to or from disability inactive status, or reinstatements to:

- (a) the disciplinary enforcement agency in any jurisdiction in which the respondent is admitted,
- (b) the chief judicial officers of all courts of this State,
- (c) the chief judicial officers of all federal courts located in this State, the United States Court of Appeals for the Third Circuit, and the United States Supreme Court,
- (d) any national data bank maintained for the purposes of reporting disciplinary action relating to lawyers, and
- (e) the news media.”

Rule 13, allegedly protects the accused, including me, while protecting the ODC from libel law suits. It does not require I keep the proceeding confidential. However, Rule 14, gives the illusion the State, ODC, and coconspirators have immunity to verbally persecute the accused, should they win, , including me inciting social, economic and physical persecution

verbal government attacks cause, based on my religious-political beliefs, religious-political speech, religious political association, and religious-political petitions.

I argued the Defendants are not immune from suit and Rule 14 will not protect them should they attack me further in the future, per the analysis in my Complaint. See Id. 2.

With new and additional information commonly arising in my case, I have a running request to **amend the complaint to conform with additional and new evidence**, as they arise at the end of the proceeding, to include additional or new claims or evidence.

I am also mailing you and Defendants electronic copies

1. Video where I spoke at a Democratic function, showing I misbehaved by accepting donations from the Democratic party before I learned how it caused oppression and injustice per Jesus the Christ's teachings in *Matthew* 6:1-4. I sinned and I am sorry your honor.

2. Video of a vulture that was pecking at the window that was not scared of me despite yelling at it in the winter of 2022.

3. Video of me on TV in the news complaining of rats in my dorm apartment from a Christian School Duquesne Law School.

4. Pictures of Judge Hardiman and me in law school, to show my personal connection to argue he should not be assigned the case should he be chosen due to potential partiality.

5. Pictures of me attending a Democratic function, misbehaving, when I should have been available to all people, regardless of party to prevent **conditional conformity** with the party's agenda, which prevents **unconditional love** and service for all citizens, regardless of each individual's position and party affiliation.

6. Video of me lamenting about how Nancy Pelosi and congress people misbehaved by failing to impeach. Nancy Pelosi remarked on respecting the flag when she transferred the articles for impeachment, placing her hand to my face on my article of impeachment to safeguard the NFL player's freedom to associate and speak out on alleged disparate treatment towards Black Americans in the judicial system. Our officials put on a deceptive horse and pony show, feigning concern on government racist persecution of the people. They do not seek justice for the oppressed as I asked them to. They misbehave, and are need of Court correction and guidance.

7. PDF's of the pleadings I filed against the democrats, suing them without violating Jesus Christ's teachings by asking for donations or signatures, which I believe damns people to hell. I would be a bad leader if I encouraged conduct that harmed people in this life and damned them to hell forever your honor.

8. I also attached some of my marketing material so you can understand my heart, but I feel dirty. Government is a service not a business. Officials should be elected not based on appearance or popularity but based on their heart. The people should vote on their ideas not appearance. Jesus teaches us judge correctly, not based on appearance. The title marketing appears naughty to me, your honor.

I am not a bad guy. I am an imperfect Christian, not crazy. I freely choose to have the mind of Christ, not the mind of the world.

Thank you for your time and attention to this important matter.

Very truly,

/s/Meghan Kelly

Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
Bar Number 4968  
( 4,039 Words)

# Exhibit Q

Table of contents for August 26, 2022 letter

### **Table of Exhibits for Letter**

- Exhibit A** Doctored up praecipe, dated October 5, 2020, filed October 6, 2020
- Exhibit B** July 12, 2021 Letter to the Delaware Supreme Court regarding “I was booby trapped by the Court staff Arline Simmons”
- Exhibit C** The praecipe to serve Delaware local counsel, through the Civil Process clerk, with the address crossed off and my initials, through the instructions of Arline Simmons.
- Exhibit D** The praecipe with the switched address/signature page.
- Exhibit E** Letter to Master Patricia Griffin regarding I am not an attorney advocate in the case, and the 60 days allowed for Federal agents to respond.
- Exhibit F** Letter to Assigned Vice Chancellor, dated November 10, 2020, regarding I served both Attorney General William Barr and President Trump, both the complaint and amended complaint, and requested subpoenas to serve local counsel Unites States attorney General David Weiss through the civil process clerk.
- Exhibit G** Letter to Master Patricia Griffin, dated October 30, 2020, regarding removal, immunity removed, and President Lincoln’s misbehavior that President Trump copied.
- Exhibit H** Letters to the Delaware Courts requesting waiver of notary requirements since a party President Trump contracted Covid-19 at the time.
- Exhibit I** Letter from the Court indicating a waiver of notary requirements has already been issued unbeknownst to the Chancery Court staff and myself.
- Exhibit J** Letter to Master regarding disparate treatment, based on religion, political beliefs or association or poverty in violation of the equal protections clause, with attached emails to Court staff Katrina Kruger and Arline Simmons.
- Exhibit K** Letter to Master regarding Chancery Court staff misled me to almost miss the appeal deadline.
- Exhibit L** Email to David Weiss and opposing counsel regarding Dr. Bunting,

Judge Smalls potentially relating to my petitions.

**Exhibit M** Email to opponents, with page 39 of the Fourth Industrial Revolution, relating to the elimination of lawyers, and courts down the line.

**Exhibit N** My pleading before arbitrator, Defendant David White.

**Exhibit O** An ODC's response to my complaint against Justice Kavanaugh, and the complaint against Judge Kavanaugh

#### **Electronic Data**

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# Exhibit R

IN THE SUPREME COURT OF THE STATE OF DELAWARE

IN THE MATTER OF A MEMBER  
OF THE BAR OF THE SUPREME  
COURT OF DELAWARE

§

§ No. 58, 2022

§ Board Case No. 115327-B

§

MEGHAN M. KELLY,  
Respondent.

§

§

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

Respondent Meghan Kelly's Motion for good cause, 1 pursuant to Supreme Court Rule 9, to unseal the record in this case, 2. to declare self-regulation of attorneys, and judges unconstitutional, allowing impeachment and judicial determinations in case and controversies to be the only means to correct professionals, attorneys and judges, and 3. in the alternative, eliminate the secret trial requirements of professionals, requiring the choice of an open or closed forum to be at the discretion of the accused professional, instead of requiring a secret proceeding, concealing the accused's defense, to the advantage of the accuser state, in violation of equal protections, and due process 1st and 14th protections.

**I Unsealing Pleadings in this case**

1. Opposing counsel did not object upon my request for their stance.
2. This Court filed an Order deactivating my license to practice law. The Order requires I petition the Board in a secret proceeding, where documents are sealed, in order to have

the mere opportunity to be heard, albeit before a biased forum, on restating my property interest in my active license to practice law.

3. I intend to file a Rule 18 Motion for Reargument on this Court's Order deactivating my active license to practice law.

4. I also intend to appeal the Order to the US Supreme Court, on the record.

5. I must report to the 6 other jurisdictions where I am licensed to practice law, after a decision is found on my Motion for Reargument or the time to Reargue has lapsed.

6. To my horror, the Clerk of Court sent out the unfinalized decision to every jurisdiction I am licensed to practice law, when I googled my name and discovered I was being sued in one such forum.

7. I may be sued by 6 courts based on this Court's unfinalized Order.

8. Should I lose on appeal or collateral attack in the DE District Court, I may be required to discuss the record of this matter, upon my petition for restatement as an active member of the bar.

9. I have one copy of the file in paper form. Yet, public access to court copies prevents economic costs that cause 1. a substantial burden upon my access to the courts in defense of my fundamental rights, and, 2 a substantial government burden requiring I choose between forgoing my free exercise of religious beliefs against indebtedness or my right to petition the Courts and the Board, relating to fundamental rights. Exhibit A <sup>18</sup>

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<sup>18</sup> Exhibit A shows my poverty, and my strong opposition, as an attorney, in inactive status, against term limits or Congressional control over the US Supreme Court. I also oppose self-regulation. Impeachment and law suits are the two means to correct judges. No judge should be

10. My computer does not permit storage of all data, and gives limited room by professional design to force consumers to use the trackable internet storage systems.

11. This Court is aware that my computers have broken, and have been replaced or repaired at times.

12. I require electronic access to documents, by making them public, to prevent a substantial burden on costs by requiring I copy physical documents to defend my person, should I lose, more data, as I have previously lost during this proceeding.

13. State Law librarian Galen Wilson kindly indicated he could pull public pleadings should I lose them for any technical reason.

14. More importantly, unsealing the documents, by my request, allows me a fairer opportunity to be heard in accordance with my asserted Due Process and Equal Protection Protections, as a party of one. US Amend I, XIV. Unsealing the documents grants me, the professional accused, the opportunity to be heard before the public too, as to defend my character before the world as a believer in Jesus Christ as savior, not in money for security.

15. The inherent, intentional, threat of releasing an opinion against the accused, while sealing the proceedings before the Board, and documents in the accused defense, places the

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controlled by business professionals, including professional boards, or by Congress, outside of written rules they may draft relating to impeachment. The judges will be tempted down the line by automation's ease, to potentially have their position as judges eliminated through automation. Automation has no power to render justice with mercy like judges. Judges have the ability to critically think beyond the standards, to see clearly the unique case before it, to render true justice based on truth, not conformity or sameness. Judges have a duty to protect people's freedom who think differently than they do, even if they believe those beliefs harm business's bottom line. What is more important money or freedoms under our constitution? I argue the Constitutional laws protecting individual liberty and individuals supersedes professions and entities who desire to sacrifice individual liberties or individuals for the entities or associations bottom line.

accused, at a disadvantage. This practice is made to intentionally chill accused professionals' speech contained in the petitions to defend their position. The voices of professionals, including my voice, are silenced by these inherently unjust rules. This punishes learning by silencing professional critical thinking to be conformed to the standards, which may exploit customers for convenience, costs, and material gain.

## II Self-Regulation

16. Self-regulation takes government out of the hands of the government and makes business above the law, by making business, and professionals desire for money, the law.

17. This biased self-regulation enslaves professionals to business greed, not good, not based on freedom in a fixed bad business economy.

18. Allowing Professionals to self-regulate, corrupts justice by tempting professionals to look after their own, at the cost of exploiting others, untamed by the just rule of law to prevent killing, stealing or destroying human life for what I argue is the mark of the beast, business greed. Professionals have a tendency to conceal their own misconduct to prevent harming their mere appearance, and reputation of their colleagues.<sup>19</sup>

19. Self-regulation by deferring to professional standards causes injustice, by preventing courts from correcting professional standards that harm people.

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<sup>19</sup> As a Christian, I believe people sin for sacrificing justice to protect the illusion of the appearance of justice within the courts. Actual justice includes learning from our mistakes, not covering them up as this Court did by sealing four documents in *Kelly v Trump*, and terminating the employment of two court staff to conceal material evidence in my case. *John 7:24*, "Stop judging by mere appearances, but instead judge correctly."

20. As a child of God, I believe people sin by teaching man to blindly trust science, professionals, experts, research or innovation. I believe people are misled to harm by blindly trusting in man, the creature, the created and his creation, his scientific work, research, products and services as god and guide.

21. Perfection is not the standard, even for judges. Where there is humility, there is grace, improving the world here and in eternity. Where Government and government backed partners teach loyalty to profession, pride in profession, or position above loyalty to the Constitution, or where business is the law, there is lawlessness, by sacrificing people, and individual liberty for material gain.

22. This lawlessness, and corruption within government creates a threat of economic, physical or social persecution against my person and the public.

23. Partial forums, including this Court's, as applied, and the Board's, focus on professions, guarantee lawless injustice by focus on money instead of caring for people and their individual liberty above money, productivity, costs and convenience.

24. The practice of law is not a mere business. The practice of law protects freedoms that are not for sale, by barter or exchange. Money is not the law. The practice of law requires independent, impartial, critically thinking judges who uphold people's Constitutionally protected freedoms to think, live, believe, exercise belief, associate by the dictates of their independent, individual conscience, not the dictates of money or professionals.

25. Injustice is guaranteed when a judicial determination is for sale, a matter of barter or exchange as opposed to truth under the law. This affords those without anything to exchange, except their souls to slavery in violation of the 13<sup>th</sup> Amendment, at a disadvantage, in violation

of the Equal Protections Clause's protection of the poor, and common person's fundamental right to access to the courts. The Courts must be more concerned with actual justice than the mere appearance of justice to serve their positions.

III. I request the Court allow self-representation for all professionals accused before a Professional Board.

26. This Court requires I petition before the Professional Board in order for opportunity to be heard to regain my active license to practice law. The Board requires by default, sealed secret hearings that give the state an advantage to the detriment of the accused, me.

27. A closed proceedings before professional board violates my due process right to a fair trial applicable to the state pursuant to the First and Fourteenth Amendment.

28. It appears professionals are afforded fewer opportunities by impartial forums where the focus is on lawless lusts, business greed, business marketing, and materialism at the cost of denying justice to people unconditionally, not for sale, with focus on the bottom line of business.

29. These closed proceedings, as applied to me as a party of one, arguably violate my First Amendment right to free exercise of religious-political speech, religious-political belief, religious-political exercise, religious-political petition, and religious-political association.

30. The closed proceedings arguably violate the Due Process and Equal Protections under the law, of parties of unconforming professionals, including me, who critically think beyond the standards that profit professionals at the detriment of the public, and the First Amendment right to Petition, pursuant to US Amend I, XIV.

31. Requiring a secret proceeding, concealing the accused's defense, to the advantage of the accuser state, while permitting the state to declare the final outcome, if it is detrimental to the accused professional to the public, disparages the professional's character before opportunity to be heard on appeal, or with the reasonable, foreseeable intentional result of chilling the free exercise of critical thinking, belief, speech, professional affiliation, beyond the dumbed down conformed standards which stifle innovation by punishing free enterprise, free thought, and free debate.

32. The protected freedom of the people to use their minds, not economic force through money by profit or monetary penalties is what improves business, while protecting something more precious, individual freedom.

33. The closed proceedings disadvantage me, the accused, and creates injustice in the loss of fundamental rights, sold in exchange for the convenience of business, making even the courts corrupt, in that they focus on productivity, convenience, costs, in lieu of individuals and individual liberties, making people for sale, not free, by focusing on the bottom line.

34. Professional Boards should not make business and money the law. Impartial judges in the courts, and elected law makers should determine the law, based on critical independent thinking to determine the truth, not conformed to the force-fed thoughts of professionals who make money the law. The Equal Protections Clause may be violated by making those with something to barter, power, position or profit, able to buy justice, whereas the poor, though not less valuable, are left with nothing to barter, but their own soul. Justice is not for sale, but is a matter of truth, not barter or exchange. I hate the scales the pagan goddess Lady justice carries, and hate her blind eyes and sword. A scale represents business, not equal protections under the law. I believe she teaches the way to hell by teaching justice can be



compromised and weighted based on material gain. Mercy is more important than money.

Correction in court to heal victims, while helping wrong doers improve by guiding them to make better choices, without controlling a no longer free people by artificial indebtedness, is more just. The sword represents heartless vengeance, with blind unconcern, not a loving leader shepherding his sheep. This dumbed down, ignorance is innocence, is a lie. I want judges to see clearly to care for the people. Judges need not be perfect, yet humble in that none are God, not even biased professionals, science or experts. I want judges to independently critically think, at the risk they may make mistakes. Otherwise, injustice will remain. Lawlessness will remain to be the letter of the law by allowing professionals in diverse areas to kill, steal and destroy for the bottom line, because they did not know. They did not care to know. They relied on the ever changing science. I believe people go to hell for not knowing, not using their own brain, which is sad. We should stop rewarding hardening our hearts from caring to know, to prevent the pain caused by loving others, which requires sacrifice to self.

35. God teaches vengeance is God's and if we play God we reflect the image of the lawless one Satan and are in danger of hell. It is scary when God says, Woe to those who draft unjust decrees. (Citing, *Isaiah* 10:1-6) I believe this means damned to hell are you should you not repent. Unjust decrees are based on love for money, driving out the love of humanity.

36. I want judges to see clearly, unblinded by desire for convenience conformity grants, but seeing clearly to seek true justice, to overturn unjust decrees.

37. The Sixth Amendment to the U.S. Constitution provides defendants in criminal cases with the right to a public trial. I argue this right must be extended to accused professionals. I have a Sixth Amendment right to a public trial to petition the Court to restate my active license to practice law.

IV. Risk of injustice to the Public

38. I realize that the Disciplinary Counsel in the 6 other jurisdictions I am licensed to practice law in may disagree with my request because it will eliminate their job, and may give them incentive to punish me more harshly, to look after their position at the public's expense.

39. It is self-serving for me to cowardly exclude my request that this Court declare professional self-regulation of attorneys, other Professions, and judges unconstitutional.

40. Doing what is right and just, in the eyes of God, not man, is more important than doing what is beneficial to me.

Wherefore, I pray this Court grants my motion.

Dated August 15 , 2022

Respectfully submitted,

/s/Meghan M. Kelly  
Meghan Kelly, Esquire  
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# Exhibit S

IN THE SUPREME COURT OF THE STATE OF DELAWARE

IN THE MATTER OF A MEMBER  
OF THE BAR OF THE SUPREME  
COURT OF DELAWARE

§

§ No. 58, 2022

§ Board Case No. 115327-B

§

MEGHAN M. KELLY,  
Respondent.

§

§

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

Respondent Meghan Kelly in "the interests of justice" pursuant to Rule 8, to 1. Declare the reporting requirements unconstitutional requiring by written rule I, and other disciplined attorneys, violate my 5th Amendment right not to testify against myself to the government in order that the government may have evidence to prosecute me, 2. Declare the Case and Controversy requirements are not met in the system of attorney self-regulation. US Amend V, U.S.C.A. Const. Art. 3, § 2, cl. 1.

**I. Factual Background**

1. On August 10, 2022, this Court filed an Order deactivating my license as disabled.
2. I incorrectly believed the Delaware Clerk of Court, Lisa Dolph, ("Clerk"), automatically gave the Order to every jurisdiction I am licensed to practice law in ("jurisdictions").
3. On August 13, 2022, I filed the attached letter in the with the Third Circuit Court of Appeals in my Civil rights case, 21-3198 Exhibits. (**Exhibit A, excluding exhibits**).
4. Upon discovery, I learned the law clerk did not appear to send the Order to every jurisdiction where I am licensed to practice law.

5. I came to the realization, as soon as I report, I will be prosecuted by different governments I report to, in violation of the Constitution's Fifth Amendment protections and common sense.

6. At the threat of punishment, I must report. If I report I face greater punishment, than if I do not report, which does not seem fair. This is likened to the holocaust, where my ancestors in Lithuania faced threats by the Nazis, during World War II. The Nazis allegedly required imprisoned people to dig their own graves. So, they or their people may be killed and disposed of in the graves.

7. Similarly, the reporting requirements for attorney discipline proceedings requires I give the gun to other Courts. So, they may mechanically shoot me in the head, by reciprocation or worse.<sup>20</sup>

8. I filed the attached letter in the Third Circuit, striking language relating to reporting, and indicated it was for more informational purposes only. (**Exhibit B, without the attachments thereto**).

9. Next, on August 16, 2022, I sent the attached letter to the Third Circuit, and similar letters to every other jurisdiction, by placing the same in the mail box, wherein, I invoked my Fifth Amendment right, requested a waiver of the reporting requiring, and additional time to report the discipline should the waiver be denied. (**Exhibit C**).

10. On August 17, 2022, I received the attached Order from the Third Circuit indicating they would use the letter I filed in my civil rights case, any reason the Court deems. (**Exhibit D**).

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<sup>20</sup> This is imagery, not a real gun.

11. In the evening, around 6:50 PM, the Third Circuit Court deactivated my license to practice law. **(Exhibit E)**

12. I did not know how the Third Circuit found out, and asked Lisa Dolph, who referred me to the ODC.

13. I contacted the ODC per the attached email, and have not received her response. **(Exhibit F).**

14. I regret I foolishly complied with reporting procedures that may have caused my prosecution in the Third Circuit Court. I should have known better as an attorney safeguarding Constitutional liberties, which preempt conflicting state laws and regulations. The United States Supreme Court held, “The Self-Incrimination Clause of the Fifth Amendment, which has been absorbed in the Fourteenth, extends its protection to lawyers, and should not be watered down by imposing the dishonor of disbarment and the deprivation of livelihood as a penalty for asserting it.” Citing, *Spevack v. Klein*, 385 U.S. 511, 516 (1967) (holding that Fifth Amendment applies in attorney discipline proceeding). Nevertheless, I asserted the Fifth in all other jurisdictions, and argue this reporting requirement violates the Constitution and must be declared unenforceable against the Fifth Amendment, and public policy.

## **II. The Reporting Rule is Unconstitutional by required waiver of the 5<sup>th</sup>**

### **Constitutional protections if not invoked.**

15. The rule requiring licensed attorneys to report disciplinary actions against their person in other jurisdictions, where they are licensed to practice law, is the rule in all federal and state courts. See Del. Law. R. of Disciplinary Proc. 18 (a).

16. I argue this rule is unconstitutional and must be declared unenforceable. Under the compelled government threat of punishment for failing to report, licensed attorneys must

self-incriminate, in violation of US Amend. V. The self-reporting rules eliminate a Constitutional right unless invoked. An accused, me, should not have to invoke the 5<sup>th</sup>. The self-reporting rule per se violates the Constitution. The Constitution preempts this rule.

17. Requiring I report to this Court by written rule, and other courts where I am licensed to practice law, requires I provide evidence to the state in order that they may prosecute me relating to my license to practice law in violation of my 5th Amendment right against self-incrimination.

18. In *In re Gi Yeong Nam*, 245 B.R. 216 (Bankr. E.D. Pa. 2000), the Court held:

“Once a witness voluntarily reveals an incriminating fact, Fifth Amendment privilege against self-incrimination cannot be invoked to avoid disclosing the details of that fact unless the witness' answer to the particular question posed would subject him or her to a “real danger” of further incrimination.” U.S.C.A. Const. Amend. 5.

19. In my case, volunteering information by reporting orders against my license subjects me to automatic government prosecution. The fact I appeal orders on public record before appellate courts, does not remove the “real danger” of further government prosecution in proceedings bearing “a close relationship to proceedings criminal in nature.” *Id.*, and *Citing, Kelly v. Swartz*, No. CV 21-1490-CFC, 2021 WL 5083435, at \*2 (D. Del. Nov. 2, 2021).

20. Should I notify **state courts** of an order incriminating me, it appears the Clerk customarily gives the self-incriminating notice to the Office of Disciplinary Counsel who automatically prosecutes.

21. In **federal courts**, the procedures are different. It appears the self-incriminating-reporting letter is given to a federal judge or a panel of federal judges, who may choose to prosecute the attorney by reciprocal deactivation of license or by a heftier penalty. Either way, there is an automatic deactivation of my license once a case is open.

22. The rules give the illusion of impartial discretion, but prosecution appears mandatory. Sam, a staff at the Delaware District Court, said she had no choice. She was required to follow the procedures against my license, which includes automatic suspension of my lawyer privileges, as the Court automatically reciprocates any Order disciplining lawyers.

23. Should a federal judge or panel of federal judges elect to prosecute me, or other attorney through reciprocity, the Court is required to issue a notice allowing attorneys to show for good cause why such automatic taking of property interest must not occur.

24. I, the accused disciplined attorney, am required to bear the burden to prove my innocence or defect in the process, against the assumed guilt. The burden of guilt until proven innocence appears to violate my Fifth Amendment rights. I reserve this issue for appeal, while acknowledging I must research this.

### **III. The system of reciprocity violates Case and Controversy Requirements**

25. Federal reciprocity requires the Court to be the prosecutor, the judge and witness too, not an outside adverse party, violating the case or controversy requirements of U.S.C.A. Const. Art. 3, § 2, cl. 1.

26. In federal reciprocity cases, I would not serve an opposing counsel in the US Supreme Court or any other federal court, should reciprocal discipline be conducted against me. I would be defending myself against required Court prosecution where I, the accused, would bear the burden of clear and convincing evidence as to why the Court must not prosecute me, in potential violation of my Fifth Amendment rights.

27. The Third Circuit held,

“The existence of a case or controversy requires: (1) a legal controversy that is real and not hypothetical; (2) a legal controversy that affects an individual in a concrete manner so as to provide the factual predicate for reasoned adjudication; and (3) a legal controversy



with sufficiently adverse parties so as to sharpen the issues for judicial resolution. *Rendell v. Rumsfeld*, 484 F.3d 236 (3d Cir. 2007)

28. The Third element is not met in all cases before federal disciplinary hearings.

There is no adversarial party when the entity prosecuting is judge and jury, including mine. This system of reporting must be overturned to preserve the Constitutional liberties of the accused. This issue is capable of repetition, yet evading review, and should be, in the interest of justice under Rule 8, be considered by an impartial, nonfederal, judicial forum. A federal court will not admit it violates the Constitution by blindly adhering to its internal procedures, even the United States Supreme Court requires the same. This Court must, in the interest of justice, consider these important issues.

#### **IV The case and controversy requirements are not met in my case.**

29. There arguably is no controversy in my case, just a cover up of court misconduct, elimination of witnesses, the wrongful removal of four public documents material to my defense from public records, and government persecution towards me, but for my First Amendment exercise of or assertion of my protected Constitutional rights

30. The record shows, I do not intend to practice law before the courts should the restriction on my license be lifted. I intend to seek to rejoin my former law firm where I would perform real estate settlements.

31. There is no harm to the state showing a case or controversy. There are mere complaints about run on sentences, typos, and citations to the sham fixed transcript, I maintain my objection to, where the reporter misrepresented what I said to intentionally collude to fix the outcome or because she could not hear me.

32. The record also shows the State laments I discuss the bible as a source of my religious belief relating to petitions where I assert and defend my religious exercise. My

religious beliefs and compelled violation of those beliefs and exercise of my religious beliefs are in issue as the protected liberty interest I sought to protect in *Kelly v Trump*, and one of the liberty interests I seek to defend in this present case. It is unconstitutional for the Court to persecute me, because I invoke my First Amendment right of belief, religious-political-belief, religious-political exercise, religious-political-association, religious-political-speech, and my right to petition the Court to uphold these religious-political fundamental rights, despite the State's disagreement with my beliefs, typos, or inconvenience that my poverty creates to the court.

33. The State is aware of my circumstance. Due to lack of resources, working computers, printers, paper and other luxuries, I had typos and run on sentences in some of my pleadings. I did not have the luxury of time or resources to proof read or correct documents. I typed desperately wherever I could use computers or print documents, including at libraries, with limited time at the computer. I was required to file timely or waive my rights. I do not regret imperfectly standing up for my religious belief from government persecution.

34. I would regret doing nothing. If I am unable to exercise the most basic First Amendment rights, speech, belief, association, exercise of belief and petition, then I may logically assume others are not free. Standing up for myself, now, no matter how imperfectly, may create precedent to stand up for the rights of others, well past my fleeting, soon to be forgotten life here.

35. The Court also grasps at straws by holding there is evidence of either a physical or mental disability. The state appears to be claiming my belief in Jesus is a disability, or there is a physical disability alluding to a possible physical disability as a harm to the state, with unclean hands, as the State has notice of my limitations. The state rushed the proceeding in violation of

my right for an opportunity to be heard, notice, an opportunity to prepare and defend perform discovery, call witnesses, having motions ignored, left unaddressed, in the forum below, or above, and intentionally caused foreseeable emotional distress, in hopes to make me physically ill to use it against me, like heartless monsters.

36. I dispute the allegation of physical disabilities as an “or” source for this Court’s holding. The record excludes sufficient evidence to make such a finding. Even if on appeal, the Court finds physical limitations, such as the shingles temporarily caused in my case or otherwise, such limitations would not limit my ability to practice law. And if such limitations are found, I invoke the protections of ADA protecting me from state discrimination, either by denial of meaningful access to the courts based on alleged disability, or denial of First amendment rights based on such disability, or my license to practice law based on any such alleged disability, without accommodation by the state. I reserve this for appeal.

37. Whether Constitutional protections are violated by the reciprocity system is a more important issue than mere appearance, and productivity, in terms of material gain for professions or businesses, at the cost of sacrificing freedoms.

38. The Courts, as government servants, work for justice, not money. If government judges, law makers and presidents care more about money and draft, enforce, and uphold rules that violate the more important Constitutional laws, than none of us are free.

39. If money is the law, then the people are slaves to the government by artificially indebtedness, under the guise of freedom.

40. I have a duty to uphold the Constitutional laws that protect something more precious than all the money in the world, individual liberty from government incited private or

public economic, physical or social burdens upon, but for the exercise of such Constitutional rights.

41. This Court's duty to uphold the same is even more stringent. The Constitution protects me, from the Government, including the Court, from persecuting me for the exercise of my fundamental rights.

42. Sameness is not fairness. Respecting people's individual liberty to believe, think, associate, live, exercise belief, and rights by the dictates of their conscience, no matter if it does not conform to the majority is a duty of this court.

43. In order to safeguard freedom, the government must let go of control, allowing lawful disorder the exercise of liberties and freedom creates in a world where not everyone is the same or chooses to believe the same or live the same.

44. The government's duty is to care for people, while protecting the people's freedom, not control and exploit the people for material gain and productivity, under the guise of order and improving the man-made-unnatural economy.

45. The issues relating to government compelled self-incrimination by the reporting requirements and the case and controversy issues are capable of repetition, yet, evading review. This Court must in the interest of justice consider these Constitutional issues. Otherwise, no other Court may and violations of freedom for the convenience of the government backed private business partners will continue into infinity, sacrificing humans for business greed, not good.

Wherefore, I pray the Court grants my Motion or at least entertains Constitutional concerns.

Dated August 19, 2022

Respectfully submitted,

/s/Meghan M. Kelly  
Meghan Kelly, Esquire

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# Exhibit T

UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF PENNSYLVANIA

IN THE MATTER OF A MEMBER  
OF THE BAR

MEGHAN M. KELLY,  
Respondent.

§  
§  
§  
§  
§

Misc. No. 22-45  
Judge, The Honorable Paul S. Diamond

Respondent Meghan M Kelly's Motion for permission to use electronic filing, and waiver of paper copies before this Honorable Court, and an exemption from PACER costs to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, and compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights

I Respondent Meghan M. Kelly pursuant to Fed. R. App. P. 2, in the interest of justice, move this Honorable Court for permission to use electronic filing before this Honorable Court even if my active license to practice law is placed on inactive/disability status/or disbarred in representing myself in this appeal, a waiver of paper copies, and an exemption from PACER Costs 1. to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, 2. to prevent a government compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights, and 3.to prevent compelled involuntary servitude in exchange with access to the courts to defend my licenses and liberties from being taken away for my religious beliefs in Jesus. (Citing, US Amendments I, V, XIII).

I. Procedural History:

1. On August 27, 2022, I filed a status update letter with three disciplinary orders wherein I also notified the Court:

"I turned in my license on my vehicle and cut off my car insurance since the State of Delaware is preventing me from seeking to regain my former position performing real estate settlements with my former law firm.

I bike to drop off documents to other jurisdictions through the US Post Office which is 8 miles per round trip. I have been experiencing bad allergies.

I am grateful for this court's allowance of electronic filing [via email]. Thank you for your time and consideration." (Exhibit A, District Court Docket Item ("DI") DI-3)

2. This Court misconstrued my letter wherein I provided notice of reciprocal discipline and expressed gratitude for email filing authorization as a motion for ECF, and denied the letter as if it was a motion for a request I did not make. (Exhibit B, DI-7).

3. This Court's staff permitted me to electronically file by email by sending documents to [paed\\_documents@paed.uscourts.gov](mailto:paed_documents@paed.uscourts.gov), which I utilized for filing documents throughout this proceeding.

4. I appealed the matter which is now before the Third Circuit Court of Appeals. (DI 25, DI 27-DI-28) Sometime after the appeal and the filing of an in forma pauperis motion, the notice of appeal and the request for transcript this District Court's case manager, Gail Olson (hereafter "Gail Olsen") indicated she no longer allows me to electronically file by email at [paed\\_documents@paed.uscourts.gov](mailto:paed_documents@paed.uscourts.gov) . Third Circuit Docket Item ("3DI") 3DI-27)

5. This Court's staff, Nicholas recommended I send documents to Gail Olson's email address for filing [gail\\_olson@paed.uscourts.gov](mailto:gail_olson@paed.uscourts.gov) while placing the words "to file" on the caption.

6. Gail Olson understands I cannot use the Electronic Document Submission (EDS), since lawyers are not permitted to use it. I am a lawyer and I contest the disbarment to seek to be reinstated on appeal. I am also a Christian. I believe many things other people think are no big deal lead to certain damnation in the fires of hell. Knowingly lying for the convenience of others or to gain a material benefit violates my religious beliefs against sin, lawless enslavement to lusts. In order to register I would be required to say I am not a lawyer. I am a lawyer, even if I am not currently barred and will be barred when I overturn the order above. I assert my First



Amendment rights to petition, religious belief, and religious exercise of belief without government compelled violation of my asserted religious beliefs in exchange for exercising the First Amendment right to petition.

7. Gail Olson requested I send a Motion for ECF permission. She requested I apply as a party not as an attorney for efilings rights. (Exhibit C) 8. Unlike EDS, I would not be compelled to lie under oath in violation of my religious beliefs in order to file a Motion for ECF

9. I did not understand how to file as a party under PACER until receiving clarification that I did not have to apply for two separate PACER accounts.

10. Without email filing rights or ECF rights, I am prejudiced by lack of time to defend multiple suits arising from or related to the original disciplinary order. This Court also knows I am prejudiced by poverty, religious objection to indebtedness and my assertion against involuntary servitude in violation of the 13<sup>th</sup> Amendment. DI-11, DI-19

11. I filed a motion to stay the proceeding with the Third Circuit Court of Appeals, to give me time I need to petition in this matter, other matters, attend to my health, visit loved ones and attend a funeral. My health has diminished. I am dehydrated and for a stint I lost vision in my eye. I was scared and remain scared of the very real risk of blindness and death associated with severe dehydration if I am left unaccommodated by the courts in the form of time. Exhibit D.

12. I also drafted a Motion for additional time with the Third Circuit I attach hereto and incorporate herein as Exhibit E.

13. Attached to the Motion for additional time I include my appeal of the reciprocal Order in PA. The US Supreme Court appeared to grant me some mercy by scheduling a

conference September 26, 2023 instead of more immediately. While I am concerned about the Federal default discussions in recent news where the news indicates funds may run out for some programs as early as in October 2023, I am grateful the court appears to be granting me a little time.

14. I had hoped to outline the plans of an economic overthrow, or reasons I believe the US Supreme Court is being attacked and how to prevent it in either the US Supreme Court appeal or the Delaware case, but I appear to be running out of time.

15. My health has diminished. I am quite dehydrated, and my goal is not to die for the vanity of wicked men who sacrifice humans for convenience or material gain. My goal is to defend my life, licenses, health and eternal life before these courts without government compelled not free waiver.

16. I require a stay to fight potentially 14 defendants in the civil rights case, Kelly v Swartz, 21-1490. I am scared as I defend my religious belief in Jesus as God not money and mammon as God. *Matthew* 6:24. I fight not for my mere license to practice law, but for my eternal soul from the fires of hell, my First Amendment private right to petition, First Amendment private right to religious-political belief, my private First Amendment right to exercise belief, my First Amendment private right to association, even as a licensed attorney, Equal Protections, procedural due process and other interests.

17. I was scared Judge Diamond was booby trapping me by asking me to draft a motion for ECF rights. Since he appeared to deny ECF rights not yet ripe for adjudication to cause me to forgo this law suit. DI-3, DI-7.

18. Judge Diamond seemed to booby trap me into disbarment too. This means this Court may do the same to others. It is not okay to use trickery to sacrifice individual liberties and the preempting Constitutional law for the vanities and the pleasure of the court. I confront judges to correct and protect the courts not destroy them by requiring fair forums for pro se claimants, without selective disparate treatment based on poverty or lack of representation. US Amend V. There are plans to destroy the courts. I seek to preserve the courts by preserving the rule of law.

19. I was scared to file this motion since this court appeared to have denied ECF access in bad faith to compel me to violate my religious beliefs or give up my First Amendment right to petition

20. I have been retired from PA since 2018. (Exhibit E, page 125 of 185) This court had access to confirmable data to confirm I have remained retired from PA since 2018 to date, with the additional insulting addition of disabled placed on my license despite the fact PA has no jurisdiction over me under its rules of limited jurisdiction. See, 204 Pa. Code § 85.3.

21. This Court appeared to booby trapped me by creating the assumption I was retired by asking me to draft a memorandum on why I should not be retired in its court too. I have limited time, resources and ability to research. The Court should not have placed me as disbarred instead of as retired. Moreover it is clear error of law, of fact creating manifest injustice against me to place me on retirement too, even if the order should be changed. I did not have notice of disbarment, and the Court had reason to believe I did not understand the consequences of retirement. This Court knew I was confused and exploited that confusion to get out of analyzing the voluminous amount of Constitutional issues in the underlying original

disciplinary case the reciprocal case is based on. The Orders in this Court violate my 5th Amendment right to notice, and a fair proceeding.

22. The US Supreme Court held in, *In re Ruffalo*, 390 U.S. 544, 551 (1968), “The charge must be known before the proceedings commence. They become a trap when, after they are underway, the charges are amended on the basis of testimony of the accused. He can then be given no opportunity to expunge the earlier statements and start afresh.”

23. I did not know the Eastern District Court would disbar me when I did not draft a memorandum as to why retirement in PA would not retire my license in its Court. I asked the Court be placed on retirement so as not to be barred as active, but I thought I might have been wrong on my assumption of retirement. I was confused without ability to research the issue due to lack of time and resources. It was a booby trap based on a misunderstanding similar to the entrapped lawyer relating to the disciplinary proceeding in *In re Ruffalo*, where I was denied fair notice and a fair and fair opportunity to be heard given my unique situation of facing 6 law suits, limited access to the courts given lack of time, health limitations and poverty creating a substantial burden to my access to the courts and religious belief against debt. Maybe the District Court misunderstood my letter which created manifest injustice. Reviewing the letter with fresh eyes I can understand why the District Court may be confused too. Either way the Order should be overturned.

24. While, I do not have easy access to resources, the District Court should have known retirement in state does not automatically retire my federal license unless specifically drafted in its rules. The rules do not require reciprocal retirement in my case. So, the District Court appears to have set me up to fall which is not fair or just. I gave the court notice I lacked time and resources to investigate. DI-9. I was under duress having noticed the District Court of

my collapse upon the floor of the post office due to lack of time to care for my health to sustain it. I noticed the District Court of my lack of resources to pay for car insurance, and my limited resources too. DI-3, DI-9

25. I did not have the means to research until later. I discovered and realized I must appeal the Eastern District of PA Order or potentially face 6 new law suits. That is important to prevent.

26. After researching I discovered I was not automatically retired since disbarred PA attorneys are not automatically disbarred and may have an office to practice before the Federal courts. *See, Theard v. United States*, 354 U.S. 278, 282 (1957); *Selling v. Radford*, 243 U.S. 46, 49 (1917), *Frazier v. Heebe*, 482 U.S. 641, 648 n.7 (1987); *also see, In re Surrick*, 338 F.3d 224, 231 (3d Cir. 2003), (disbarment by the [s]tate does not result in automatic disbarment by the federal court." *In re Ruffalo*, 390 U.S. 544, 547, 88 S.Ct. 1222, 20 L.Ed.2d 117 (1968)). *Surrick v. Killion*, 449 F.3d 520, 530 (3d Cir. 2006), ("The question in this case is whether a state may prohibit an attorney admitted to the bar of a federal district court, but suspended from the state bar, from maintaining a legal office for the sole purpose of supporting a practice before the federal court.")

27. I was scared to draft this Motion for ECF filing rights and permission because I am concerned this Court was booby trapping me. I was scared this Court may be trapping me to entice me to divert time from other matters to dispose of me and my case to get out of work. This Court previously denied efilng rights not ripe to deny. I did not move the court for rights prior to its denial.

28. This Court knows I am prejudiced by lack of time while I fight multiple suits, poverty, religious objection to indebtedness and my assertion against involuntary servitude in violation of the 13th Amendment.

29. I am scared. The Courts are behaving like the wild wild west in the disciplinary matters, not acting within the scope of the Constitutional rule of law, or jurisdictional limits. The Delaware Supreme Court violated the Constitution, federal laws, and fired two court staff, colluded in fixing the original disciplinary proceeding by denying me notice and meaningful opportunity to be heard. The Delaware state Court did not afford me an opportunity to subpoena or call witness despite my motions to do so to conceal the fact the State Court eliminated witnesses and material evidence in my favor. The court sealed my pleadings necessary to my defense.

30. I am really freaked out. This Court filed another pro se party's medical records in my pleadings. Then, this court seemed to schedule notice of a hearing to get out of correcting the voluminous amount of misfiled documents DI 10-19. I attach and incorporate the pleadings from another matter as Exhibit F. Allowing me to file will save the Court time while safeguarding my right to be heard by accurately filed petitions. DI 13. (Exhibit G)

31. The fact the courts make mistakes or claimants allege misconduct does not destroy the courts, but maintains the rule of law by showing the public the Courts are not above the Constitution or correction too.

32. We need people staff and people judges. After all, the only reason why we have courts is people make mistakes and sometimes misbehave by covering up misconduct for convenience, position, power or profit.

33. I oppose disciplinary proceedings of federal judges. I believe the only fair forum to address judicial misconduct is 1. In cases or controversies or 2 impeachment.

34. I object to the courts eliminating me, a private party or other claimants for exercising the First Amendment right to petition to correct mistakes or misconduct by the Court and its agents. That teaches the world judges are above the Constitutional rule of law, and professionals are below the Constitutional law's protections. This is injustice.

35. I also object when the state or federal courts look at parties unequally in favor of the state and its agents to the disadvantage of the population's lives and liberties. This violates the Equal Protections Clause of the 5<sup>th</sup> as applied to the federal government and the 14<sup>th</sup> as applied to the state.

36. For example Del. Law. R. of Disciplinary Proc. Rule 7(d) provides grounds for discipline includes "[Failure] to furnish information to or respond to a request for information from the ODC, the PRC, the Board, or the Court, unless a protective order has been obtained from the Board or the Court." This rule is a government compelled violation of an accused's 5<sup>th</sup> Amendment right against self-incrimination under the threat of discipline. Cooperation with the state should not be praised as a mitigating factor of handing over the noose to one who seeks to hang you by dicta in case law. It is unjust when judges note cooperation with praise to get out of work only to discipline the one they applaud.

37. As a Christian I believe God when he teaches it is sin when judges show favor towards the state's agents or partners by doing what government's counsel commands, in violation of the 5<sup>th</sup> Amendment. That is not fair but creates a fixed system bent towards injustice by sacrificing individual claims and constitutional freedoms towards slavery not freedom to the

government and government backed foreign and private partners. I seek to preserve the integrity of the courts in my other cases. I also seek to defend my religious belief in Jesus in Kelly v Swartz a civil rights case.

38. Pursuant to Fed. R. App. P. 2 for good cause this Court may “suspend any provision of these rules in a particular case and order proceedings as it directs.”

39. I argue alleviating a substantial economic burden that potentially causes an obstacle to my access to the courts is good cause.

40. I also have religious-objections against indebtedness. I am a Christian. I believe in Jesus Christ. Jesus teaches you can only serve one master God or money. I choose God. Artificial indebtedness compels people to worship money as God, and savior in place of God.

41. I pray this Court does not require I violate my religious beliefs for the mere opportunity, not guarantee on being heard on appeal from the Delaware Supreme Court in Kelly v PA ODC, or in my civil rights case, 21-3198.

42. The Third Circuit Court kindly granted me an exemption for PACER costs in Kelly v Swartz, NO 22-3198 and on appeal at 22-3372. In addition, the Delaware District Court similarly afforded me ECF access and an exemption from PACER costs.

43. My PACER Account Number 6975241.

44. I respectfully request an exemption be applied for the duration of this case up until appeal or the time has appealed to the US Supreme Court or until January 20, 2024, whichever is longer.

45. I thank the Court and its staff for its help.



46. I agree to send PACER the attached Order or any Order this Court files to exempt PACER fees in this case, should this Court grant my plea.

47. I have been experiencing computer trouble. Not all browsers permit me to print or download e-served documents. I attempted to download e-served documents for this matter, but discovered they were no longer available since the browser failed or was incompatible.

48. The costs relating to PACER for second looks are unaffordable. 49. The original disciplinary order from Delaware from which the reciprocal suit by the Eastern District is based adjudicated me inactive/disabled. 50. The Delaware Order prevents me from working as an attorney. I am unable to seek employment at my former law firm where I would be performing real estate settlements. My former law firm is a great law firm McDonnell and Associates. The people there care about their clients and employees above money. 51.

I am impoverished and am not allowed to work in my profession of choice.

52. Even if the Order in DE is overturned, the Eastern District's Order may prevent my former firm from rehiring me. They work with others who perform their due diligence to protect clients and the large amounts of money in real estate transactions.

53. The firm does thorough background checks.

54. Having any blemish remaining on my license affecting my credibility or appearance of credibility may deem me unemployable.

55. Since I am poor and unemployed, I do not have money to pay fees. My parents have indicated they have decided to cut off or reduce my inheritance should they die, because of this litigation.

56. It is against my religious belief to go into debt, especially given I am not permitted to work for pay as an attorney in DE. (See, Bible Romans 13:8. “Owe nothing to anyone, but to love them”).

57. I request this Court grant me an exemption in order not to compel me to violate my religious beliefs in exchange for access to the courts in defense of my exercise of my First Amendment liberties, my license and related interests.

58. I respectfully request this Court grant me an exemption of PACER fees (1). in order not to compel me to violate my religious beliefs in exchange for access to the courts or (2). suffer an economic substantial burden so great as to deny me access to the courts in defense of my First Amendment liberties, license and related interests and (3). to prevent government compelled involuntary servitude to sin by making money savior in place of God.

59. It is my religious belief people should buy and sell by free choice, not by forced choice by artificially man-made government compulsion to be exploited by government backed private or foreign partners in a fixed not free economy. 60. I argue compelled debt in my case not only violates the 13th Amendment against involuntary servitude, but violates my private, personal individual religious belief in Jesus, God the father and the holy spirit as guide and God, not money by government compelled force. US Amend I, XIII.

61. I believe the plans under the UN, G-7 and global agenda violates my religious belief against indebtedness to money and material gain as God at a greater more horrific level, and violates my First Amendment right to religious belief. Creating precedent in this case, may prevent the elimination of not only my Constitutional liberty but the liberty of all Americans protected under Constitutional law. I hope to somehow tie that in to other litigation.

62. I believe people teach a lie, despite their ignorance of truth, and sin against God and man for teaching government is a social contract by the people to government. It is a forced choice upon the populace without a meeting of the minds or consideration. The people's souls are not to be sold by the government through the government backed private or foreign partners to be sacrificed to gain the world. Leaders are charged with caring for the people and protecting their liberty. Misleaders seek to control and exploit for material gain a no longer free people. It is written Mark 8:36, "What profits a man to gain the whole world [by money or material gain only to lose his eternal life in the second death to be no more.]"

63. The contract of government is by those governing who agree to more limited liberty in exchange with the authority to serve, govern and guide.

64. I seek to preserve our government with honesty by seeking to unrig the system of corruptions within by requiring the Courts place checks on the other branches of power and their own when those within branches exceed their Constitutional authority and violate the Constitutional laws that protect the people they are charged to serve, not exploit.

65. There appears to be a societal peer pressured attack against the courts to create lawlessness under the guise of freedom. There appears to be an attack to dismantle the government as opposed to unrig unjust practices which exceeds Constitutional laws that protect the common people.

66. I seek to preserve our system of government by upholding the Constitution and asking the courts to guide those misguided by lusts under the belief of laws.

67. With regards to my plea, the Government is not permitted to discriminate based on religious belief by denying me access to the courts by requiring my enslavement to debt making money savior in place of Jesus. Matthew 6:24

68. Given my poverty, any fee, including PACER fees create a substantial burden to my access to the courts and my religious-belief against indebtedness. 69. I am a Christian, a child of God, a believer of Jesus Christ. I believe people sin leading to damnation in the fires of hell by debt, focusing their mind, and life towards the aim of gathering money as savior in place of God's desires.

70. I believe people sin for using money to control others, to do their will, or the government's will by reward, or punishment in terms of fines because I believe this misleads people to hell by making money master, God and guide. 71. The original disciplinary order caused multiple reciprocal law suits. These additional law suits have increased costs, and caused me to panic, lose sleep, and gain baby white hairs. If I expend all my resources in terms of time, paper and other costs, by defending all cases simultaneously only to run out of resources, I would be prevented from defending my exercise of fundamental rights in any case to its conclusion.

72. A lawyer's right, my right to pursue my profession constitutes a property protected by the due process clause of the 5<sup>th</sup> Amendment, and of which I cannot be deprived for any whimsical, capricious or unreasonable cause, including the state's disagreement with my religious-political beliefs or poverty or pro se animus.

73. I must be afforded access to the courts to defend my license to practice law from being placed on inactive disabled but for my faith in Jesus Christ, and exercise of fundamental

rights. My First Amendment right to petition must be conditioned on elimination of my other asserted rights against slavery in violation of the 13<sup>th</sup> Amendment, and religious belief and exercise of belief in violation of the First Amendment.

74. Please grant me access to ECF and a PACER exemption until conclusion of this case.

75. I am utterly poor. The costs relating to filing by paper or PACER fees create a substantial burden and obstacle to my access to the Courts in contravention to my First Amendment right to access to the Courts applicable to the Federal Courts via the Equal Protection component of the 5th Amendment, for me, a member of class of one due to religious beliefs against incurring debt combined and due to utter poverty. *See, Abdul-Akbar v. McKelvie*, 239 F.3d 307, 317 (3d Cir. 2001) (“This requires us first to determine whether Appellant is a member of a suspect class or whether a fundamental right is implicated.”); *Lewis v. Casey*, 518 U.S. 343, 370 (1996) “[A]t all stages of the proceedings the Due Process and Equal Protection Clauses protect [indigent persons] from invidious discriminations.”)

76. “Because this case implicates the [Constitutionally protected] right of access to the courts, [ and First Amendment rights to free speech, religious belief, association and exercise of religious beliefs] the government’s disparate treatment towards me, based on poverty, is still unconstitutional under a strict scrutiny basis test.” *Citing, Tennessee v. Lane*, 541 U.S. 509, 533 n.20 (2004).

77. The Supreme Court noted, “There can be no equal justice where the kind of trial a man gets depends on the amount of money he has.” *Lewis v. Casey*, 518 U.S. 343, 370 (1996).

78. PACER costs and costs associated with paper filing, as applied, violate my religious beliefs, religious practices and religious exercise against incurring debt, and costs, as

applied. I seek protections under the 5th Amendment's Equal Protection component, as a party of one, with unique religious beliefs to gain access to the courts to defend my exercise of 1st, and 5th Amendment liberties.

79 I expected to rejoin my old law firm after standing up for something more important than money in *Kelly v Trump*, my free exercise of religion, exercise of religious and political belief, exercise of religious and political speech, and association as a party, attorney, democrat, and Christian without government incited persecution, but for my exercise of fundamental rights.

80. The Delaware Order against me and the reciprocating Order creates a government incited economic substantial burden upon me, and prejudices me by forcing me into a maintained state of poverty by preventing me from seeking to get my former position back at my old law firm as an attorney, or any work as a law firm, and harms my reputation to make me less attractive to employers.

81. While, poverty is not a suspect class, my right to meaningful access to the courts, despite the inherent burden of poverty, and my religious beliefs and strongly held religious exercise relating to my religious belief against indebtedness are protected. In addition, fundamental rights are implicated.

82. So, the Court must have a compelling reason to deny my request for an exemption of the PACER fees to protect my access to the courts to defend the exercise of my fundamental rights including my religious beliefs narrowly tailored to meet the important justification.

83. There is no compelling reason to deny my request for ECF access and for a PACER fee waiver, especially since it will prevent my need to contact the court should the one free glance fail to save.

84. Nor is any justification narrowly tailored to meet any compelling reason. The Court may grant an exemption without any burden upon the court. This will alleviate needless burdens upon the court by preventing the need to call the court to confirm documents were received and filed or to correct Court staff's misfiling of documents. DI 13.

85. I face an undue burden should this court deny my request, including loss of my First Amendment rights, property interest in my license, loss to my reputation, other damages, loss of employment opportunities and a substantial burden to my access to the courts.

86. There is no opposing counsel to request a position on.

87. I write under great duress, with haste and apologize for any typos.

Wherefore, I pray this Court grants this Motion.

June 20, 2023

Respectfully submitted,

/s/Meghan Kelly

Meghan Kelly, Esquire  
DE Bar Number 4968  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
(302) 493-6693

Not acting as an attorney on behalf of  
another, defending my private first  
amendment belief in Jesus not money  
and mammon as God.

---

# Exhibit U



RE: DE Supreme Court Case 541

---

From: Dolph, Lisa (Courts) (lisa.dolph@delaware.gov)

To: meghankellyesq@yahoo.com

Cc: david.weiss@usdoj.gov

Date: Tuesday, January 10, 2023 at 04:35 PM EST

---

Meg,

As set forth in the attached order dated May 18, 2022, the Court previously denied your request for a free copy of all filings in Misc. No. 541. In accordance with the May 18<sup>th</sup> order, I emailed you electronic copies of all File & ServeXpress filings that did not exceed 20 MB in *In re Kelly*, No. 58, 2022. Based on the attached table of contents for the exhibits to your objections in No. 58, 2022, you have the documents relating to the appointment of counsel in Misc. No. 541.

**Lisa A. Dolph**  
**Clerk of Supreme Court**  
**55 The Green**  
**Dover, DE 19901**  
**(302) 739-4187**



---

**From:** Meg Kelly <meghankellyesq@yahoo.com>

**Sent:** Tuesday, January 10, 2023 1:11 PM

**To:** Dolph, Lisa (Courts) <Lisa.Dolph@delaware.gov>

**Cc:** david.weiss@usdoj.gov; Meg Kelly <meghankellyesq@yahoo.com>

**Subject:** Re: DE Supreme Court Case 541

Hi Lisa,

I believe I am entitled to these documents even if they are not uploaded on the file and serve system, including testimony before the Board regarding appointment of counsel, if applicable.

Thank you,

Meg

On Tuesday, January 10, 2023 at 01:08:51 PM EST, Meg Kelly <[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)> wrote:

Hi Lisa,

Thank you for talking with me. May I please have the documents for DE Supreme Court No. 541 relating to appointment of counsel and removal of counsel and all documents on that docket relating to me, and the board case.

Thank you. Justice Vaughn signed the Order on or about December 30, 2022. There is no need for me to copy opposing counsel since they were privy to the arguments whereas I was not.

Thank you,

Meg

Meghan Kelly

34012 Shawnee Dr.

Dagsboro, DE 19939

(302) 493-6693

[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)



58, 2022 Copies Order.pdf  
142.6kB



58, 2022 Respondent's Table of Contents of Exhibits to Objection.pdf  
894kB

# *Exhibit V*

Kelly v Swartz 23-A100 Stance second additional time since merely received 30 days and thought I had longer

From: Meg Kelly (meghankellyesq@yahoo.com)

To: zi-xiang.shen@delaware.gov

Cc: meghankellyesq@yahoo.com

Date: Thursday, August 24, 2023 at 10:24 AM EDT

Hi Zi-Xiang,

What is your position if I ask for another extension of time for our case?

I am panicking. I think I should file the Eastern District Court appeal first before our case, but I am scared about being sued by six courts.

If the Court will not prevent regulation of federal judges in the Eastern District Case appeal we still have our case where I may argue the US Supreme Court is wrong to prevent the elimination of people judges and people lawyers by not only automation but by making the banks and businesses the judges in place of Courts through block chain technology to prevent people like me from buying things I need like ink or paper at Walmart. Walmart charges 13.99 for an ink other places charge 18.99. It is not fair that I am blackballed I think because I do not have a bank account.

I have other reasons too and merely seek your position.

On an aside, yesterday I spoke with someone at Case text about an AI research tool test. I indicated my fear of AI legal research because someone recently got into trouble regarding ChatGPT. The representative indicated ChatGPT's "hallucinations" are based on gathering information from the entire internet as opposed to case law and statutory texts. She indicated Case text was bought by Thomas Rueter who is also affiliated with Westlaw. I am concerned there may a scheme to create a monopoly by affiliations and shell companies who own everything you may want to watch out for to break up down the line.

I was too scared to gain a trial because the representative indicated it would not extract my data from my computer. She does not know that. If I test it out out of desperation to gain access to case law, I may let you know about it. I am scared about hacks and do not trust imperfect people or technology made to compromise the security of people to control not care for them. If we could only close the back doors President Bush opened up with the Patriot's act which allows for this new economic system, we could preserve the security and people's liberties including privacy rights from being eliminated.

Thank you,

Meg

Meghan Kelly

34012 Shawnee Dr

Dagsboro, DE 19939

meghannkellyesq@yahoo.com

(302) 493-6693

# Exhibit W

MEGHAN MARIE KELLY, ESQUIRE

---

34012 Shawnee Drive  
Dagsboro, DE 19939

Anthony Sodroski  
Office of Disciplinary Counsel  
1601 Market Street 3320  
Philadelphia, PA 19103

**RE: Report Discipline Order PA Bar No 202268 Retired/Supreme Court No  
2913 DD3**

September 3, 2022

Dear Anthony Sodroski,<sup>1</sup>

On September 2, 2022, I received a letter from the Pennsylvania Supreme Court in Pittsburgh, PA relating to Meghan Kelly, matter No. 2913 DD3.

I also received a notice on my door that I missed a document. I left a voice message with your office concerning this fact.

I am arguing motions, and intend to draft and file a motion in the original disciplinary Court this Tuesday, September 6, 2022.

---

<sup>1</sup> I have religious opposition to using Mr., Mrs. or Miss, or Ms. I am a Christian, a child of God. I believe Jesus Christ teaches us not to use these titles to categorize people based on marital relationship or sex. See Bible, *Matthew* 23:8-11, also see, *Galatians* 3:28 (“There is neither Jew nor Gentile, neither slave nor free, nor is there male and female, for you are all one in Christ Jesus.”). I am called to unconditional love and respect others, not based on their relationship status or title as a male or female, as a parent, as married or single. Disparate treatment based on title as opposed to need is unjust.

Additionally, I brought a civil rights case, on or about October 25, 2022, in the Delaware District Court, No 21-1490, appellate Third Circuit Court, No. 21-3198.

In addition, there are a total of 6 other potential disciplinary proceedings against me, simultaneously, including the original Delaware proceeding.

Reargument has not been decided.

The Delaware Disciplinary proceeding was first brought, informally, in interference with my case against former President Donald J. Trump (“Trump”) to impede the outcome of the case, or to cause me to forgo my case, based on the Delaware Supreme Court’s and the arms’ of the Delaware Supreme Court political-religious animus, or poverty animus.

I brought a RFRA petition against Trump to alleviate a substantial burden upon my free exercise of religious belief, caused by Trump’s establishment of government-political-religion, through a series of his identified conduct, and executive orders.

Trump’s establishment of government-political-religion incited others to persecute me, socially, economically and physically, including by threatening harm to my property and life.

Someone allegedly shot into the home of my friend, Gregory Layton, almost hitting him and his wife as they sat at the kitchen table as two bullets entered their

home, based on Greg's perceived political or religious beliefs. I sought to safety from the Delaware Courts, only to be punished for asking for help. The Court punished me based on my religious-political beliefs contained in my religious-political-speech in the religious-political-petitions, and to cover up state misconduct.

The Delaware Disciplinary proceeding both informally and formally have lasted beyond a year.

Should this proceeding begin, it will likely last beyond a year too.

I seek to ask the Pennsylvania Supreme Court for permission to stay the proceeding, to allow me to file a "for cause" motion after the conclusion of **both**, my Civil rights case, regarding the disciplinary proceeding, and the original Delaware Bar proceeding before the Delaware Supreme Court, until the proceedings have been concluded, including the appeal to the US Supreme Court has been complete, or the time of appeal has lapsed.

Staying the proceeding will conserve judicial resources. A determination by the US Supreme Court on my appeal of the original discipling court may otherwise conflict with this Court's decision, or may give precedent, which may foreclose my case.

I am also considering appealing the Third Circuit's Reciprocal Disciplinary matter to the US Supreme Court, matter No. 22-8037. It appears those who have



been suspended or disbarred are afforded more Constitutional protections than those labeled “disabled” under the Third Circuit’s rules. (See *Rules of Attorney Disciplinary Enforcement Rules 6 and 16*) Disabled attorneys, unlike suspended or disbarred attorneys, are not permitted to file a “for cause motion” within 30 days of an Order issued reciprocating discipline to contest the original order on procedural defects and Constitutional concerns.

Essentially, the Third Circuit’s disciplinary rules appear to unconstitutionally disparately treat lawyers labeled “disabled,” by eliminating procedural due process protections, while affording more Constitutional protections to all other disciplined attorneys.

It is more advantageous to be disbarred than to be labeled as disabled under the Third Circuit’s rules.

So, I may ask for additional time, should I appeal the denial of receipt of documents for a “for cause” motion in the Third Circuit too.

Could you please let me know your position on my potential motions.

Instituting a case now will interfere with my appeal and civil rights case.

I am impoverished, unable to work at my former law firm, where I would be performing real estate settlements. I have been compelled to turn in my car tags. Car insurance is unaffordable, and I have religious oppositions to debt.

I also have religious oppositions to healthcare and mental healthcare.

This proceeding would cause a substantial burden on my exercise of access to the courts on appeal for the original disciplinary case, and in my civil rights case, by additional costs I am unable to afford, but for the original proceeding.

Your case will prejudice the outcome of my other two cases, by preventing me time and resources I require in order to make petitions in those two cases.

Attached, please find orders three jurisdictions who have instituted reciprocal disciplinary proceedings.

Thank you for your time and attention to this important matter.

September 3, 2022

Respectfully Submitted,

---

Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
302-493-6693  
Bar No 202268 **RETIRED Bar**

# Exhibits

The PA letter docketed in the Matter of Kell in the US District Court for the Eastern District of PA on October 12, 2022 showing knowledge I was retired before PA-ODC instigated reciprocal discipline and other documents showing courts retaliated against me to cover up court mistakes or misconduct in other cases or matters on appeal

# Exhibit F

1

Additionally, I brought a civil rights case, on or about October 25, 2022, in the Delaware District Court, No 21-1490, appellate Third Circuit Court, No. 21-3198.

In addition, there are a total of 6 other potential disciplinary proceedings against me, simultaneously, including the original Delaware proceeding. Reargument has not been decided.

The Delaware Disciplinary proceeding was first brought, informally, in interference with my case against former President Donald J. Trump ("Trump") to impede the outcome of the case, or to cause me to forgo my case, based on the Delaware Supreme Court's and the arms' of the Delaware Supreme Court political-religious animus, or poverty animus.

I brought a RFRA petition against Trump to alleviate a substantial burden upon my free exercise of religious belief, caused by Trump's establishment of government-political-religion, through a series of his identified conduct, and executive orders.

Trump's establishment of government-political-religion incited others to persecute me, socially, economically and physically, including by threatening harm to my property and life.

Someone allegedly shot into the home of my friend, Gregory Layton, almost hitting him and his wife as they sat at the kitchen table as two bullets entered their

home, based on Greg's perceived political or religious beliefs. I sought to safety from the Delaware Courts, only to be punished for asking for help. The Court punished me based on my religious-political beliefs contained in my religious-political-speech in the religious-political-petitions, and to cover up state misconduct.

The Delaware Disciplinary proceeding both informally and formally have lasted beyond a year.

Should this proceeding begin, it will likely last beyond a year too.

I seek to ask the Pennsylvania Supreme Court for permission to stay the proceeding, to allow me to file a "for cause" motion after the conclusion of both, my Civil rights case, regarding the disciplinary proceeding, and the original Delaware Bar proceeding before the Delaware Supreme Court, until the proceedings have been concluded, including the appeal to the US Supreme Court has been complete, or the time of appeal has lapsed.

Staying the proceeding will conserve judicial resources. A determination by the US Supreme Court on my appeal of the original discipling court may otherwise conflict with this Court's decision, or may give precedent, which may foreclose my case.

I am also considering appealing the Third Circuit's Reciprocal Disciplinary matter to the US Supreme Court, matter No. 22-8037. It appears those who have



It is more advantageous to be disbarred than to be labeled as disabled under the Third Circuit's rules.

Could you please let me know your position on my potential motions.

Instituting a case now will interfere with my appeal and civil rights case.

I am impoverished, unable to work at my former law firm, where I would be performing real estate settlements. I have been compelled to turn in my car tags. Car insurance is unaffordable, and I have religious oppositions to debt.

I also have religious oppositions to healthcare and mental healthcare.



This proceeding would cause a substantial burden on my exercise of access to the courts on appeal for the original disciplinary case, and in my civil rights case, by additional costs I am unable to afford, but for the original proceeding.

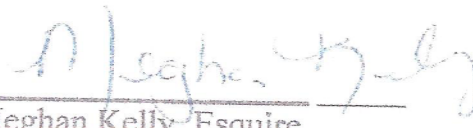
Your case will prejudice the outcome of my other two cases, by preventing me time and resources I require in order to make petitions in those two cases.

Attached, please find orders three jurisdictions who have instituted reciprocal disciplinary proceedings.

Thank you for your time and attention to this important matter.

September 3, 2022

Respectfully Submitted,

  
\_\_\_\_\_  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
302-493-6693  
Bar No 202268 **RETIRED** Bar

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

Dated: September 3, 2022

Meghan Kelly (printed)

Meghan Kelly (signed)

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

IN THE MATTER OF:

MEGHAN M. KELLY

Respondent.

)  
)  
)  
)  
)  
)  
)

MISCELLANEOUS

NO. 22-mc-341

ORDER

AND NOW, this 16<sup>th</sup> day of August, 2022, it appearing that on August 10, 2022, the Delaware Supreme Court transferred Respondent to disability inactive status and ordered that she shall not practice of law, in the State of Delaware, it is hereby

ORDERED that Respondent file with this Court, within thirty (30) days from the date of this Order, a detailed statement informing this Court of any claim by Respondent, predicated upon grounds set forth in Local Rule of Civil Practice and Procedure 83.6(b), that the imposition of identical disability inactive status by this Court would be unwarranted.

  
COLM F. CONNOLLY  
CHIEF JUDGE

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN THE MATTER OF : MISCELLANEOUS  
:  
MEGHAN MARIE KELLY : NO. 22-mc-0045

ORDER TO SHOW CAUSE

AND NOW, this 25<sup>th</sup> day of August, 2022, it appearing that on August 10, 2022, respondent was transferred to disability inactive status from the practice of law by the Supreme Court of the State of Delaware, for an indefinite period and until further order of the Court, effective immediately, it is hereby

ORDERED that respondent file with this court, within thirty (30) days from the date of service of this Order, an answer informing this court of any claim by the respondent, predicated upon the grounds set forth in Local Rule of Civil Procedure 83.6 II D, that the imposition of identical action by this court would be unwarranted, and the reasons therefore.

FOR THE COURT:

/s/ Juan R. Sánchez  
JUAN R. SÁNCHEZ  
Chief Judge

Case: 22-8037 Document: 2 Page: 1 Date Filed: 08/17/2022

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

Misc. No. 22-8037

In Re: Meghan M. Kelly, Esquire  
(Supreme Court of Delaware No. 58.2022)

ORDER

The Clerk received a copy of an order of the Supreme Court of Delaware, dated August 10, 2022, immediately transferring Meghan M. Kelly, Esquire, to disability inactive status until such time that she demonstrates that any disabilities have been removed.

Pursuant to Rule 16.3 of the Rules of Attorney Disciplinary Enforcement, it is ORDERED that Meghan M. Kelly, Esquire, is transferred to disability inactive status in this Court.

Nothing further is needed from Ms. Kelly to remain on disability inactive status in this Court. When she believes she should be reinstated, or if she desires to contest this transfer, formal reinstatement proceedings can be instituted. See R.A.D.E. 16.3, 16.5.

For the Court,

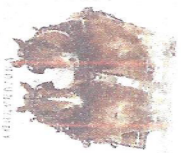
s/ Patricia S. Dodszeit  
Clerk

Dated: August 17, 2022



A True Copy:

*Patricia S. Dodszeit*  
Patricia S. Dodszeit, Clerk



Mailed Sept. 3, 2022  
U.S. post office M.K.  
mail box

Anthony P. Sadowsky Esq.  
Office of Disciplinary Counsel  
1601 Market Street, 3320  
Philadelphia, PA 19103

34472 Sadowsky  
Disc. No. D119904  
Bar #202268 M. Kelly

# *Exhibit P*



**SUPREME COURT OF THE UNITED STATES  
OFFICE OF THE CLERK  
WASHINGTON, DC 20543-0001**

February 7, 2023

Meghan Kelly  
34012 Shawnee Drive  
Dagsboro, DE 19939

RE: Kelly v. DE Office of Disciplinary Counsel  
No: 22A476

Dear Ms. Kelly:

The above-entitled petition for writ of certiorari was postmarked January 30, 2023 and received February 2, 2023. The papers are returned for the following reason(s):

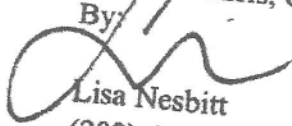
The petition exceeds the limit of 40 pages allowed. Rule 33.2(b).

Please correct and resubmit as soon as possible. Unless the petition is submitted to this Office in corrected form within 60 days of the date of this letter, the petition will not be filed. Rule 14.5.

A copy of the corrected petition must be served on opposing counsel.

When making the required corrections to a petition, no change to the substance of the petition may be made.

Sincerely,  
Scott S. Harris, Clerk  
By:

  
Lisa Nesbitt  
(202) 479-3038

Enclosures



No. \_\_\_\_\_  
\_\_\_\_\_

IN THE SUPREME COURT OF THE UNITED STATES

MEGHAN KELLY, PETITIONER

V.

OFFICE OF DISCIPLINARY COUNSEL,

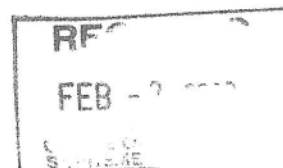
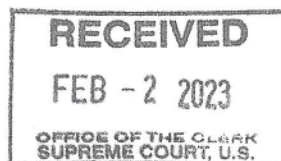
a.k.a. DELAWARE OFFICE OF DISCIPLINARY COUNSEL

ON PETITION FOR A WRIT OF CERTIORARI TO

THE DELAWARE SUPREME COURT

PETITION FOR WRIT OF CERTIORARI

Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
Pro Se, not represented by  
counsel  
meghankellyesq@yahoo.com  
(302)493-6693  
US Supreme Court No 283696



Jonathan VanLoan v. Nation of Islam, et al., No. 22-723 (/dockets/22-723)

Dominick Galluzzo v. Internal Revenue Service, No. 22-6797 (/dockets/22-6797)

Sandra Rumanek v. Sherry R. Fallon, et al., No. 22-6827 (/dockets/22-6827)

Leon Little v. United States, No. 22-6940 (/dockets/22-6940)

Ricardo Noble v. John E. Wetzel, Secretary, Pennsylvania Department of Corrections, et al., No. 22-7062 (/dockets/22-7062)

**April 21, 2023**

← Too late after Conference

Marcal Fraction v. United States, No. 22-5859 (/dockets/22-5859)

Terrence Gibbs v. United States, No. 22-5894 (/dockets/22-5894)

DeJuan B. Thornton-Bey v. Warden, Allenwood USP, No. 22-6499 (/dockets/22-6499)

**Petition Relisted**

Meghan M. Kelly v. Disciplinary Counsel Patricia B. Swartz, et al., No. 22-6783 (/dockets/22-6783)

Christopher H. West v. Robert May, Warden, et al., No. 22-841 (/dockets/22-841)

Lorenzo Hardwick v. United States, No. 22-7092 (/dockets/22-7092)

Charles Eugene Nolden v. United States, No. 22-7101 (/dockets/22-7101)

Fuhai Li v. United States, No. 22-7112 (/dockets/22-7112)



## Older Conferences

**May 21, 2015**

Guillermo Ruiz v. Jeffrey Butler, Warden, No. 14-9486 (/dockets/14-9486)

**November 21, 2017**

Craig Saunders v. Mark Garman, Superintendent, State Correctional Institution at Rockview, et al., No. 17-6096 (/dockets/17-6096)

 		Search documents in this case: <input type="text"/> <input type="button" value="Search"/>
<b>No. 22-6783</b>		
Title:	Meghan M. Kelly, Petitioner v. Disciplinary Counsel Patricia B. Swartz, et al.	
Docketed:	February 15, 2023	
Linked with 22A747		
Lower Ct:	United States Court of Appeals for the Third Circuit	
Case Numbers:	(21-3198, 22-2079)	

DATE	PROCEEDINGS AND ORDERS
Feb 06 2023	<p>Petition for a writ of certiorari before judgment and motion for leave to proceed in forma pauperis filed. (Response due March 17, 2023)</p> <p><b>Motion for Leave to Proceed in Forma Pauperis</b></p> <p> <a href="#">Service</a>    <a href="#">Petition Appendix</a>    <a href="#">Petition Appendix</a>    <a href="#">Petition Appendix</a>    <a href="#">Proof of Appendix</a>    <a href="#">Appendix</a> </p>
Feb 11 2023	<p>Application (22A747) for a stay, submitted to Justice Alito.</p> <p> <a href="#">Lower Court Document</a>    <a href="#">Orders/Opinions Main Document</a>    <a href="#">Main Document Main Document</a>    <a href="#">Main Document Proof of Service</a>    <a href="#">Main</a> </p>
Feb 22 2023	<p>Application (22A747) denied by Justice Alito.</p>
Mar 03 2023	<p>Motion to expedite consideration of the petition for a writ of certiorari filed by petitioner Meghan Kelly.</p> <p> <a href="#">Proof of Service</a>    <a href="#">Main Document</a>    <a href="#">Main Document</a>    <a href="#">Proof of Service</a> </p>
Mar 06 2023	<p>Letter to the Clerk of Court per Robert Meek's kind suggestion regarding submission of my motion filed today of Meghan Kelly not accepted for filing. (March 13, 2023)</p>
Mar 06 2023	<p>Different Emergency Motion pursuant to 28 U.S.C. § 2101 (f) to grant an interim stay of Third Circuit case Kelly v Swartz et al, No 21-3198 and 22-2079 for a different additional reasons, pending this courts determination on her Writ of Certiorari before of Meghan Kelly not accepted for filing. (March 13, 2023)</p>

Mar 10 2023	Letter from petitioner dated March 10, 2023 received.	Main Document Document Document	Main Document Main Document Proof of Service	Main Document Main Document Proof of Service	Main Main
Mar 13 2023	Application (22A747) refiled and submitted to Justice Jackson.	Written Request	Other	Proof of Service	Proof of Service
Mar 21 2023	Renewed application of Meghan Kelly not accepted for filing. (March 28, 2023)				
Mar 24 2023	Application to the Honorable Justice Alito to place removed exhibits back on the Docket to prevent the deprivation of her 5th Amendment Equal Protections and procedural due process right to a full and fair opportunity to be heard without selective, arbitr of Meghan Kelly submitted.	Main Document Document Document	Main Document Main Document Main Document	Main Document Main Document Main Document	Main Main Proof of Service
Mar 25 2023	Letter to Clerk regarding Appellant Plaintiff Meghan Kelly's Application to the Honorable Justice Alito to place removed exhibits back on the Docket to prevent the deprivation of her 5th Amendment Equal Protections and procedural due process right to a fu of Meghan Kelly submitted.	Main Document	Other	Proof of Service	
Mar 28 2023	Letter to Clerk Exhibit 5, 6, and first Page Number of 7 Application to the Honorable Justice Alito to place removed exhibits back on the Docket of Meghan Kelly submitted.	Main Document	Other	Proof of Service	
Mar 30 2023	DISTRIBUTED for Conference of 4/14/2023.				
Apr 01 2023	Withdraw Petition and Application to Justice Jackson as too late to grant relief of Meghan Kelly submitted.	Main Document	Proof of Service		
Apr 05 2023	DISTRIBUTED for Conference of 4/21/2023.				

NAME	ADDRESS	PHONE
Attorneys for Petitioner		

# Exhibits Q



MEGHAN MARIE KELLY

---

34012 Shawnee Drive  
Dagsboro, DE 19939

c/o The Clerk of Court  
55 The Green  
Dover, DE 19901

RE: -Strike Letter in 21-3198 DI 76

August 24, 2022

Dear Honorable Court:

I mailed out the letter for the disciplinary file that my case manager uploaded by mistake onto 21-3198

I attempted to call my case manager, to let her know not to upload DI 76 in this case.

I was unable to contact her. So, I sent her an Email on Monday concerning these documents.

In addition, I called the Third Circuit and let Desiree's team know. Desiree is out until August 30 or 31<sup>st</sup>.

There are a total of five separate mailings with even more DI items to be uploaded in the separate matter.

Please strike DI 76, as uploaded in error.

I note with prejudice that the order is easy to read whereas my attachments are lighter and harder to read. This is quite prejudicial by placing me in an unfavorable light.

Please transfer the physical items to be uploaded by Desiree's team in a less prejudicial manner.

Thank you for your time and help.

I have to bike to the post office. It takes more than an hour and a half each trip, requiring multiple trips. So, I may be hard to reach this week. I am filing in a total of 9 different forums simultaneously, 7 disciplinary hearings, 6 if you exclude Delaware, the District Court below, and this court. The boxes are heavy and I am required to ride my bike multiple times.

Thank you for your help.

August 24, 2022

Respectfully Submitted,

/s/Meghan Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
302-493-6693

# Exhibit R



THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	)	Case No 21-3198
	)	
v.	)	Case No. 22-2079
	)	
PATRICIA B. SWARTZ, et. al.	)	

Respondent Meghan Kelly's Motion pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike DI 77 as misfiled to be rescanned in to the Correct Matter No. 22-8037, without lifting my motion for a stay

I, Respondent Meghan Kelly, pro se, pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), respectfully request this Court strike DI 77, and give the physical documents to Desiree's team to be uploaded for Matter No 22-8037, while reserving my motion for a stay.

1. On or about Monday, August 22, 2022, I contacted the Third Circuit to speak with the case manager Desiree regarding 5 separate mailings coming in for a reciprocal disciplinary matter.

2. I learned Desiree, the case manager, is on vacation until August 30 or 31<sup>st</sup>.

3. I called the Third Circuit and spoke with a representative to alert them that mailings were coming in for the disciplinary matter, not the civil rights suit brought because of the wrongful disciplinary proceeding against me.

4. Representatives confirmed they would be on the lookout for mailings and would not place them on my civil rights case.

5. I emailed Pam, my case manager to alert her that I had mailings coming to the Third Circuit. I asked her not to file these mailings for the disciplinary matter in the Civil Rights proceeding.

6. Pam confirmed Desiree's team were looking out for my mailings.

7. Despite my attempts to prevent documents relating to a confidential proceeding from being uploaded on the wrong case publicly, on August 24, 2022, a letter for the disciplinary file was uploaded onto this matter by mistake at DI 77.

8. There are a total of five separate mailings I have already sent out which should be in the Third Circuit's possession, with even more DI items to be uploaded in the separate disciplinary matter.

9. Please do not upload those on 21-3198.

10. Please strike DI 77, as uploaded in error.

11. I note with prejudice that the order is easy to read. Whereas my attachments are lighter and harder to read. This is quite prejudicial by placing me in an unfavorable light.

12. Please transfer the physical items to be uploaded by Desiree's team in a less prejudicial manner for the disciplinary matter.

13. Thank you for your time and help.

Wherefore I pray this Court grants my motion to strike DI 77, and transfers the physical documents to the correct case manager and matter number.

August 24, 2022

Respectfully Submitted,

/s/Meghan Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
302-493-6693  
Bar No 4968 DEACTIVE(364)

# Exhibit S

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	)	Case No 21-3198
	)	
v.	)	Case No. 22-2079
	)	
PATRICIA B. SWARTZ, et. al.	)	

Petitioner Plaintiff Meghan Kelly's Corrected Second Motion pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike 3DI 77 as misfiled to be rescanned in to the Correct Matter No. 22-8037,  
without lifting my motion for a stay

I, Petitioner, Plaintiff Meghan Kelly, pro se, pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), respectfully request this Court strike third Circuit Docket Item DI 77, and give the physical documents to Desiree's team to be uploaded for Matter No 22-8037, while reserving my motion for a stay. (3DI 78) (Third Circuit Docket Item is referred to as "3DI." Delaware District Court Docket Item is referred to as "DI" herein. All DI's and 3DI's mentioned in this motion, are incorporated herein by reference in their entirety, including subparts, even if not separately noting subparts, as if fully restated herein)

1. I filed a Motion pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike DI 77 as misfiled to be rescanned in to the Correct Matter No. 22-8037, without lifting my motion for a stay. (3DI 77-78)

2. Since then, I discovered this issue is too important. Justice and equality for all must be upheld.

3. Injustice for the poor appears to be the manner the courts behave, if the manner courts have conducted themselves towards me is the same manner of all in forma pauperis pro se clients, which is not acceptable. This needs to be corrected, without punishment, with improvement.

4. When I first starting receiving Court filings through email, by the Third Circuit for matter 21-3198, I received another person's confidential *in forma pauperis* filing relating to financial information and alleged crime. (3DI 6) I notified the Court.

5. When people plead for help to the Court, they often share their most heartfelt sensitive requests. To heartlessly, carelessly not review it, when the court usually seals this, and send it to another person, shows this court cares more about money, doing a job, convenience, not the people they serve who petition this court for help.

6. The Courts' duty is to serve justice, not greed by focusing its eyes on productivity, avoidance of costs and convenience exchanged for the cost of selling souls, individuals and individual liberty for government and government backed private or foreign partners' interests.

7. In the District Court below, no one told me there was a corrected complaint filed, until months later, after it came to my attention. This caused confusion, additional motions and a material reliance by the Delaware District Court judge below, which appeared to be in bad faith. (DI 2, 43, 61, 3DI 50, 51-57)

8. Defendants provided me with the misfiled complaint on January 31, 2022. It appears the public has access to the misfiled complaint, missing the request for damage relief, contained on the signature page. (DI 2, 61, 62, 3D-51).

9. On or about May 3, 2022, I filed Appellant Plaintiff Meghan Kelly's Motion Directing the Delaware District Court to correct the Complaint to include the signature and listed damages for relief so as not to mislead the public, attorneys and appellate Courts.

10. I filed a motion to publicize the corrected complaint after Sam told me she corrected it, and it remained unavailable to others, including Defendants. (DI 61, 62-65, 3DI 51-57)

11. I also noticed pages appeared to be missing in DI 4, since, there was a break in pages. This led me to believe additional documents may be missing from the record.

12. I also saw the Exhibits were listed out of order from the table of contents and the paper copies I submitted before the Delaware District Court. (DI 4)

13. When I arrived to drop off the paper copies, the staff at the Delaware District Court required I give them electronic copies. I complied, but did not waive my right to make the record appear as my original paper pleadings showed. I filed a letter with the court confirming I required my pleadings appear accurate on the record. (DI 18)

14. In addition, I have expended additional funds to provide the Delaware District court with additional memory sticks for bigger pleadings, along with paper copies at times. (DI unavailable)

15. In January 2022, I made a four hour round trip to pay for filing privileges with the Delaware District Court since staff would not permit me to pay over the phone or electronically.

16. The Delaware District Court withdrew my paid for filing privilege upon receipt of the Delaware's Order, without granting me notice or an opportunity to be heard on this property right which foreseeably prejudices my in the cases before its courts.

17. On August 13, 2022, I mailed a motion to regain electronic access to the Delaware District Court.

18. Sam, a staff member at the Delaware District court, allegedly misfiled Complaint, and corrected it on October 27, 2022. She did not tell me, at the time of correction or soon thereafter. She confessed when I filed pleadings about it, months after the correction. Id.

19. I recall, with great sadness and horror speaking with Sam on the phone as I tried to get an understanding of what was on the docket. I indicated I may file a motion to correct things. She wrongly stated, “It will not affect the judge’s decision.” Whether Judge Connelly relied on the fact I made a claim for damages, albeit unartfully, is material in this present case and his arguments relating to mere equitable relief. Judge Connelly espoused the reason he kicked my case out, was based the incorrect assumption I only pled for injunctive relief. (DI 16, 17, 30, 31, 59, 60)

20. It is wrong for staff to persuade people not to exercise their right to petition, because they do not want to be inconvenienced or to get into trouble, by indicating it would not make a difference.

21. It is wrong for the Court’s staff to behave with the authority of a judge, determining outcomes, denying opportunities to be heard by discouraging parties from exercising their right to file motions.

22. Court staff must never pressure parties to waive their Fundamental rights and opportunity to be heard, for their mere convenience.

23 It is material to my case that Chief Judge Connelly misleadingly omitted the fact Defendants brought the petition against me, because they had concerns after reading my pleadings in both the Chancery and Delaware Supreme Court. Judge Connelly misrepresented the case by referring to the mere Chancery Court. (Id. and DI 2, 3, 4, 43)

24. The Delaware Supreme Court incited the disciplinary proceeding, and denied me the opportunity to be heard, the opportunity to perform discovery and subpoena two witnesses they terminated to prevent favorable testimony in my defense. (3DI 77-3-77-9, 3DI 50-55)

25. The Delaware Supreme Court removed 4 of my pleadings which are material to my defense and this case from their docket of *Kelly v Trump*, Case No 119-2021, to fix the outcome of this proceeding and the disciplinary proceedings against me. (3DI 41-46, 77-10-11; DI 62)

26. None of this is normal or okay, no matter how repugnant the government finds my belief in Jesus Christ. Defendants assert my beliefs in Jesus are illogical as the reason they brough this petition. (August 23, 2022 threatening letter, Petition at 7).

27. The State Court is required to examine legal arguments, not whether they agree with my religious-political beliefs, speech and exercise of such in my RFRA petition in *Kelly v Trump*, wherein I sought to alleviate a substantial burden upon my religious exercise by former President Trump and current President Biden.

28. The admitted purpose of the Defendants reason for any concern about alleged disability is material to the case. The reason is my religious-political beliefs and speech contained in the petitions. (DI 2-4, See the August 23, 2022 letter, Petition at 7)

29. The judge's and Defense counsel's' omission of the Delaware Supreme Court pleadings, in their memorandum and motion for affirmance, as the source of the disciplinary proceeding is material to my case. Both the State court and Defendants through their counsel mislead this appellate court and the public.

30. Then the Delaware Supreme Court cry babied about the fact I pled for additional time because the Wild life police and the Federal Government were helping, me eliminate



vultures which were attacking me and my property. Please see the video relating to vultures on the memory stick.

31. The vulture problem was serious enough for the Federal government to request a permit to place an effigy on my property. (Exhibit A, all Exhibits are incorporated herein by reference in their entirety)

32. Jeffrey R. Newcomer, a Wildlife Biologist with the USDA placed a dead bird in one of my trees, which reduced the vulture's attacks.

33. In the Disciplinary Order, the Delaware Supreme Court heartlessly refers to my requests for an accommodation due to supervening events making it impactable, while granting my requests for extensions for these reasons, but denying them for more fundamental reasons, by ignoring my appeals from the Board below. (3DI 74-75)

34. I include the two motions the Supreme Court granted for good cause here, to be incorporated herein by reference in their entirety. (Exhibit C and D).

35. My motion before the Board were ignored, or denied consideration by the Delaware Supreme Court until my rights were already violated by procedural defects that caused manifest injustice by violating my right to defend the exercise of fundamental rights, including violating my First Amendment right to belief, exercise of belief, association, speech, equal protection and substantive and procedural due process. US Const Amend I, XIV.

36. The Defendants denied me of a fair opportunity to perform discovery, subpoena witnesses, to conceal the fact the Supreme Court and Defendants hid evidence to fix the proceeding against me. They did not want me to find out. (DI. 69-75)

37. The State in bad faith prevented and obstructed discovery, to conceal witnesses were removed from the Chancery Court to impede their testimony from aiding in my defense, and to conceal relevant records were sealed by the Court to favor the ODC.

38. The United States Supreme Court held, "the suppression by the prosecution of evidence favorable to an accused upon request violates due process where the evidence is material either to guilt or to punishment." *Moran v. Burbine*, 475 U.S. 412, 466 (1986). Concealing the fact two witnesses were removed from the Chancery Court to prevent their favorable testimony in my defense, and government concealing of petitions favorable to my defense, violates my Due Process rights to a fair proceeding, by bias towards the State. (DI 74)

39. On November 4, 2021, Delaware Supreme Court sealed or removed four of my Delaware Supreme Court petitions in *Kelly v Trump* relating to disparate treatment, without notice and an opportunity for me, a party to be heard, and without valid cause. (3DI 41, 42, 43, 44, 45, 46)

40. I did not have access to the sealed documents, through public record, nor did the ODC, the public, or the federal courts, which prejudiced me to the benefit of the State. (DI 74)

41. Third Circuit Judge Bright's, concurring in part and dissenting in part in *U.S. v. Wecht*, 484 F.3d 194, 221, 226 (3d Cir. 2007) indicated sealing documents without notice or opportunity for a party to be heard without valid reason was enough to remove a judge from a case.

42. In my case, the Delaware Supreme Court, sua sponte, sealed documents to assist the ODC's prosecution of me by concealing relevant material to my defense, evidencing the entire court's apparent bias against me and the Court's partiality to the state. (DI 74)

43. “When a court considers the imposition of a seal, it must make particularized findings on the record, giving notice on the docket of such consideration and rejecting alternatives to closure.” *U.S. v. Wecht*, 484 F.3d 194, 224 (3d Cir. 2007); *See United States v. Criden*, 675 F.2d 550, 560 (3d Cir.1982).

44. In my case, the Delaware Supreme Court did not make any such findings, and clearly sealed the four docket items in *Kelly v Trump*, Delaware Supreme Court No 119, 2021, to benefit the government to my detriment, showing clear prejudice against me, in violation of the procedural and substantive due process clause applicable to the state pursuant to the First and Fourteenth Amendments.

45. Nothing was normal in *Kelly v Trump*. The State and ODC attacked and retaliated against me for my religious-political speech contained in my petitions, reflecting my religious-political beliefs. The State has a history of ignoring my religious-political petitions, disparately treating me based on religious view point.

46. Nothing was normal in my disciplinary case either. I was not treated like other lawyers or other plaintiffs. I was disparately treated based on my poverty, and personal-religious-political beliefs, as a party of one, and was selectively punished for exercise of Constitutional liberties.

47. The Board merely gave me two weeks, until the hearing, after allowing me to remove the appointed attorney by the December 30, 2021 Order. The Board ignored the motion I filed two weeks before self-representation was allowed, wherein I objected to notice, and moved for opportunity to perform discovery. (DI 74)

48. The fact I complained I required time because of outside issues interfering with my time and focus, in the rushed sham proceeding conducted against me for the exercise of

fundamental rights and to cover up years of disparate treatment against me for my religious beliefs, is not evidence of disability.

49. My requests for adequate extensions for time to prepare, perform discovery before the Board were denied. Albeit the Board gave an insignificant extension in my second request, due to a reason not contained in my motion, the shingles. Id.

50. The Delaware Supreme Court cry babbled that my religious-political and religious views did not make sense, which is not for them to decide.

51. The Delaware Supreme Court in conspiracy with the Board rushed the proceeding, ignored my motions, colluded with the Board and Defendants by predetermining the case, without affording me an opportunity to be heard until my rights were already lost per the two orders below, in the Board pleadings case based on their desire to punish me for my religious-political speech, and beliefs contained in the petitions. (DI 43, 69-75)

52. The Defendants and Delaware Supreme Court behaved like monsters rushing the proceeding, ignoring my motions, denying me of my rights, in hopes to cause me to fall ill to use it against me. I did fall ill, with the shingles. Id. (Exhibit D)

53. The Court must not act like heartless machines, but humans, capable of caring for the people they serve who plead their cries for help before it.

54. The State Court failed to look at my legal arguments. The Court looked at my religious-political-personal beliefs, while heavily citing a footnote on a document, which was not on the record before the Board below. (DI 74) I was denied an opportunity to be heard on the Court's admittance of evidence not on the record.

55. I admit I have typos and run on sentences in some pleadings. Rights must be asserted, even imperfectly. Otherwise they may be waived.

56. I am poor. I had no computer or printer or money for transportation, at times. I desperately wrote at public libraries where I was kicked off the computer, and could not afford to pay the cost of additional print jobs. I had to get my petition out there, in order to be heard or my rights would be waived.

57. I do not regret imperfectly standing up for my faith in Jesus Christ from a substantial burden caused by the government. I would regret doing nothing.

58. I do not regret standing up for my belief in Jesus against the state of Delaware either, no matter if they find my faith in Jesus as opposed to money as savior “dangerous.”

59. I am not controlled by money as God and guide, to be controlled by the state, or government backed private or foreign partners by purchase, as opposed to justice. I am free in Christ. I am not for sale. I am a child of God, not business greed, which I believe is the mark of those who choose the way to hell. I keep myself separate, holy, not forcing my beliefs upon others. I merely share them, unashamed, as truth. It should not be dangerous to speak on personal religious-political beliefs.

60. The government is forbidden from persecuting me, a private citizen, not a government employee or agent, but for the exercise of my religious belief through my speech under US Amend I, XIV. I should not face government persecution. If the state looks as citizens as people to purchase who owe them and must contribute to their government, none are free. We are slaves of the state who exploits the people to serve greed, as opposed to serving the people to uphold justice.

61. With regards to court staff, I filed a motion in the District Court, I believed was critical. I filed it while paying an additional next day mailing fee. I believe it was an additional 26 dollars if I remember correctly. (Exhibit D).

62. The filing was received per the post office, but the staff at the court house indicated it was not received. The post office confirmed receipt on November 10, 2021, and so did the filing attached to the document court stamped November 18, 2021 with the Delaware District Court, next day delivery from November 9, 2021.

63. I had no phone at the time. I used my neighbor's phone, former US marine, William Jones.

64. I experienced great emotional distress at the prospect my filing would not be heard. I was required to walk down the street and request the use of a phone multiple times, in tears as my life and liberty are on the line, but for my faith in Jesus Christ.

65. I incurred expenses to mail another motion out that cost more to me than the common person.

66. Defendants prevent me from seeking to return to my former law firm, causing me the impediment of poverty.

67. I received unfair treatment by the Delaware Supreme Court's Clerk, Lisa Dolph, by her refusal to upload my physical files, after agreeing to accept physical files in advance. (Exhibit F). She indicated they were filed, just not electronically recorded.

68. I believe the Delaware Supreme Court desired to conceal its clear violations of my opportunity to be heard by ignoring motions, the rendering of email, non-appealable orders relating to one not all of the outstanding ignored, unaddressed motions by the Board, lack of meaningful access to the courts and many other alarming, disparate conduct, based on political-religious animus, poverty animus, and Defendants desire to conceal state misconduct by not docketing the pleadings I promptly filed.

69. I was required to upload the documents electronically myself in order to place them on the electronic record of the Delaware Supreme Court to appeal to the US Supreme Court in the fixed, sham disciplinary proceeding against me.

70. I needed the documents to be on the electronic record, in order to be heard on all the many procedural, Equal Protection and First Amendment defects in the disciplinary proceeding in state court, in order to have an opportunity to be heard on appeal before the US Supreme Court.

71. I left messages with my case manager and the court on August 24, 2022.

72. Per the attached email, I incorporate herein as Exhibit G, I confirmed my case manager and the Court would look out for the mailings to place on my disciplinary matter, not this matter.

73. My case manager and other representatives confirmed they would upload the documents promptly, without prejudicial delay to the correct matter, not this civil rights case.

74. I spoke with my case manager yesterday. She claimed she did not scan in the document, and claimed ignorance as to why she received it.

75. She claimed she thought it might be an emergency filing.

76. My case manager either misrepresented the facts to me, to prejudice my case, or to cover her mistakes, or did not care to know, to scroll down to the bottom to see the letter.

77. If it is the later, she did not care to scroll down to confirm it is a letter, that is a problem for the public and other pro se filings this court must take seriously, just as seriously as wealthier claimants who may afford representation.

78. When I spoke with Sam on the phone, I was cognizant the Court chose to fire two Chancery Court staff. The Supreme Court signed off through Mrs. Robinson, a staff attorney on their termination, or at least the termination of Arline Simmons.

79. Hiding mistakes and bad choices does not improve the administration of justice. I desire mercy not sacrifice, to improve, not condemnation or sacrifice.

80. So, I told Sam it was never her fault. It was the judges. I did not want her to get into trouble or fired like the two Delaware Chancery Court staff.

81. I believed it to be the Court's error, not hers. If Judge Connelly below read my pleading claims for damages, he has no excuse for relying on the filing error by the Court's staff. (DI 2, 34-35, 43).

82. I believe when judges make bad choices by misrepresenting the facts, committing clear error, it is the court's mistake to correct, not the staffs' to blame.

83. I still do not want any staff to get into trouble. However, I see now, maybe it is the fault of the Court's staff when they prevent injustice by misfiling documents.

84. Attorneys file electronically. Whereas, impoverished and other pro se claimants may file by paper.

85. Whether the documents are accurately filed matters.

86. For instance, the document filed at DI 77 was improperly filed. The letter was not separated from exhibits, or proof of mailing.

87. The means the letter was filed was disfavorable towards me almost to intentionally prejudice this case. The sham order was legible in bold. Whereas, my exhibits in defense of my exercise of Fundamental rights were faint and hard to read, wasting over 100 pages of paper, by making it illegible.



88. The poor and pro se require equal protections of the law, without disparate unfavorable treatment.

89. Convenience, productivity, and avoidance of costs must never be used to eliminate the Court's duty to administer justice in a fair manner, in each case.

90. Fairness is not sameness. Freedom means each individual believes and exercise's religious belief by the dictates of their conscience, not an organization, or a government backed private partner, community, government or church. The organizations are not God. God is God. I must protect those who believe differently than I do too.

91. This case relates to the fact I complained to the Delaware Supreme Court regarding court staff and agents impeding my access to the courts, writing on my pleadings acting as a witness without cross examination, misleading me to almost miss my filing deadline in hopes the case would be dropped, attacking me during *Kelly v Trump* to fix the outcome by compelling me to drop the case, filing threatening letters, having Judge Clark of the Court of Common Pleas attack me all during a live controversy in *Kelly v Trump*. (DI 43).

92. The Delaware State Supreme court's arms, agents and staff must not collude with the presiding court to eliminate cases, where they find independent-religious- political beliefs repugnant or illogical, such as they appear to find my beliefs.

93. The Court is not God, and has no place to indicate my faith in Jesus as God, guide and savior, not money as God, guide and savior creates a danger to the public.

94. I protect the public from being sold and enslaved to the government's bartered for government backed private and foreign partners, by standing up for myself and my belief in God right here, and right now.

95. Beliefs, even wrong beliefs, or repugnant beliefs must be protected.

96. I request the Court improve the administration of justice, by shedding light on it, not punishing Court staff to conceal mistakes or bad choices.

97. I care about the two court staff who were terminated, who likely signed confidentiality agreements to gain retirement benefits, Arline Simmons and Katrina Kruger.

98. While they may have made bad choices, I desire justice with mercy to improve the world by correcting it, not destroying the lives of people who make mistakes and bad choices.

99. I day-dreamed about asserting third party standing to seek damages on their behalf in the amount of a million dollars each, and yet I do not like to use money as punishment. Besides, I have not brainstormed a way to assert standing.

100. If the courts behave uncontrolled by justice in exchange for focus on lusts for money and productivity, they do not care for, or serve the people.

101. Caring to even read the in forma pauperis document which was sent to me in error left an impression upon me.

102. Individual judges and staff are important and are not replaceable by automation, which does not have a heart to care about people.

103. My hope is that this case will improve the courts by guiding them to focus on justice not productivity.

104. I have religious beliefs against indebtedness, healthcare and mental healthcare and many other matters the world praises.

105. The district court acts in contravention to my First Amendment right to access to the Courts applicable to the Federal Courts via the Equal Protection component of the 5th Amendment, and the state Courts pursuant to the 14<sup>th</sup> Amendment, towards me, a member of

class of one due to religious beliefs against incurring debt combined and due to utter poverty, by denying my motion to waive costs, eliminating my electronic service function, and causing an obstacle to my access to the courts to exercise my fundamental rights. See, *Abdul-Akbar v. McKelvie*, 239 F.3d 307, 317 (3d Cir. 2001) (“This requires us first to determine whether Appellant is a member of a suspect class or whether a fundamental right is implicated. Neither prisoners nor indigents are suspect classes.”); See, *Harris v. McRae*, 448 U.S. 297, 323, (1980) (noting that poverty is not a suspect classification); (*But see, Lewis v. Casey*, 518 U.S. 343, 370 (1996) “[A]t all stages of the proceedings the Due Process and Equal Protection Clauses protect [indigent persons] from invidious discriminations.”)

106. “Because this case implicates the [Constitutionally protected First Amendment rights of speech, belief, exercise of belief, association and the] right of access to the courts,” the government’s disparate treatment towards me, based on poverty, is still unconstitutional under/ a strict scrutiny basis test. Citing, *Tennessee v. Lane*, 541 U.S. 509, 533 n.20 (2004).

107. The Supreme Court noted, “There can be no equal justice where the kind of trial a man gets depends on the amount of money he has.” *Lewis v. Casey*, 518 U.S. 343, 370 (1996); (internal citations omitted)

108. While, poverty is not a suspect class, my right to meaningful access to the courts, despite the inherent burden of poverty, and my religious beliefs and strongly held religious exercise relating to my religious belief against indebtedness are protected. My right to speech, belief, exercise of belief, association, Equal Protection, substantive and procedural due process are a protected source of the Delaware District civil rights proceeding too. US Amend I, V, XIV.

109. Fundamental rights are implicated. Defendants violated my equal protection, as a class of one, procedural and substantive due process opportunity to be heard, to prepare and

present evidence, to subpoena witnesses, to cross examine my accuser, and Defendants persecute me and seek to defame my character and take away my property interest in my license to practice law but for my exercise of Constitutionally protected conduct, in violation of my freedom to petition concerning my religious-political speech, religious-political exercise, religious-political belief, religious-political association, and association as a party, attorney, Democrat and Christian when I believe there has been a grievance committed against me.

110. Justice Stevens, with whom Justice Brennan, Justice Marshall, and Justice Blackmun joined, in dissenting of US Supreme Court in *Murray v. Giaratano*, 492 U.S. 1, 18 (1989) recognized,

“When an indigent is forced to run this gantlet of a preliminary showing of merit, the right to appeal does not comport with fair procedure. . . . [T]he discrimination is not between ‘possibly good and obviously bad cases,’ but between cases where the rich man can require the court to listen to argument of counsel before deciding on the merits, but a poor man cannot. . . . The indigent, where the record is unclear or the errors are hidden, has only the right to a meaningless ritual, while the rich man has a meaningful appeal.” Douglas, 372 U.S., at 357-358

111. The Court’s misfilings or misconduct relating to filings, based on either religious-political or poverty animus, or exercise of fundamental rights or attempts to conceal misconduct or mistakes must not be permitted to deny claimants of access to the courts.

112. In my case, a court staff who was terminated doctored up a subpoena, essentially testifying without cross examination. This caused confusion and additional filings. I did not understand why I could not serve local counsel. My case Kelly v Trump should have been kicked out for failure to serve him. Yet, the Court kicked it out because it found my arguments against the establishment of government religious beliefs, which endangered my life and property to be without merit.

113. The Courts were wrong to terminate the two staff who made mistakes. It is possible lay people did not know you could not write on pleadings without parties knowing on the record, as if testifying as a witness without ability to cross examine them in violation of my 6<sup>th</sup> Amendment rights. (See the attached letter, dated November 6, 2020 to the Chancery Court, the attached doctored up subpoena on the record, and the attached same subpoena I received without hand written notes on it)

114. Instead of destroying people's lives, hiding them in darkness, eliminating them, please help them improve.

115. The staff will likely aid more *in forma pauperis* claimants as the economy becomes worse . Fewer people will be able to afford lawyers.

116. People can care to look into matters further. Computers cannot. I would prefer the court to consider helping staff serve others better by looking at others as people to serve as opposed to productivity.

Wherefore I pray this Court considers this in Addendum and grants my motion to strike 3DI 77, eliminate it and seal it off the record and transfers the physical documents to the correct case manager and matter number 22-3087.

August 25, 2022

Respectfully Submitted,

/s/Meghan Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
302-493-6693  
Bar No 4968 DEACTIVE (5,138)

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# Exhibit T





THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	)	Case No 21-3198
	)	
v.	)	Case No. 22-2079
	)	
PATRICIA B. SWARTZ, et. al.	)	Case No. 22-8037

Petitioner Plaintiff Meghan Kelly’s Motion pursuant to Rule 40 for a panel Reargument on Order Dated August 31, 2022, and move for a Judge, **not the Clerk of the Court to render an order on this Motion for Reagument**, and her Corrected Second Motion pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike 3DI 77 as misfiled to be rescanned in to the Correct Matter No. 22-8037, without lifting my motion for a stay, and Motion to strike 3DI 77, and exhibits thereto, and related document, **due to the fact I brought up mistakes or potential misconduct by the clerk’s office to correct, to preserve impartiality**

I, Petitioner, Plaintiff Meghan Kelly, pro se, pursuant to Federal Rules of Appellate Procedure, Rule 40, respectfully request reargument on Order Dated August 31, 2022, and I request a Judge, **not the Clerk of the Court to render an order on this Motion for Reagument**, and my Corrected Second Motion pursuant to Federal Rules of Appellate Procedure, Rule 10 (e), to Strike 3DI 77 as misfiled to be rescanned in to the Correct Matter No. 22-8037, without lifting my motion for a stay, and Motion to strike 3DI 77, and exhibits thereto, and related document, **due to the fact I brought up mistakes or potential misconduct by the clerk's office to correct, to preserve impartiality. (3DI-77-86)**

1. I made complaints about the other courts and this clerk's office's improper and unacceptable conduct in this proceeding. I expressed concerns about whether other *in forma pauperis* or pro se claimants were similarly treated. This

disparate, unfavorable treatment creates an obstacle to my access to the courts, and access of those similarly situated. (3DI-82, incorporated herein in its entirety by reference)

2. I requested a stay in this case, twice. (3D-36-39, 3D-73). I reserve my motion for a stay and do not waive my motion for a stay. (3DI 86)

3. The Clerk indicated I slowed down the matter. I by no means slowed down the matter by moving the court to require the Clerk's office to upload documents to the correct matter, Case No 22-8037, in a non-prejudicial manner in order that I may not be further prejudiced than I already am. Other courts maybe watching this case, or this court may be watched by the judge or panel in the reciprocal proceeding. (3DI 82)

4. Per the attached Order, the Clerk's office is biased, and threatens sanctions against me for the exercise of my right to petition the Court by in defense of my fundamental rights by presenting evidence of the **Clerk's office's or my case manager Pamela Batt's misconduct and mistakes**. (3DI-86 or other number in 22-8037)

5. I object to the characterization of my calls and communications contained in the Clerk's Order. The comments appear similar to Defendant Disciplinary counsel's comments to me regarding my communications to Defendants in defense of my fundamental rights.

6. I am concerned about ex parte communications by the Defendants or their agents to the court in this Civil Rights case, which is a denial of procedural due process by causing unfairness. US Amend V.

7. I object to the Court to any improper ex parte communications from Defendants or their agents.

8. I made a reasonable amount of calls seeking confirmation that my documents are filed in the matter 22-8037. I made a reasonable amount of calls seeking aid in electronic filing in the disciplinary matter 22-8037.

9. Given my additional time constraints in state court, and the other reciprocal proceedings this was reasonable, and necessary for me to do.

10. It is unfortunate, that my case manager has been out for more than a week and a half after I mailed pleadings. Over a week ago the Third Circuit Court staff promised to inform Desiree's team and stated "my filings would not sit on her desk," My filings would be filed without delay in 22-8037. It appears the staff changed their mind when I followed up near the end of last week. This caused me to take time out to file motions in this court to preserve my opportunity to be heard without additional prejudice, by an impartial adjudicator, not the Clerk. (3DI 79, 80, 81, 82, 83, 84, 85)

11. Additionally, I thought it important to notify this Court by emailing Pamela Batts, my case manager, that I have fallen ill. I sent her and opposing

counsel emails concerning my fever, dizziness, and weakness on August 29, 2022.

On August 30, 2022 I sent her and opposing counsel emails of my worsening condition and increase in fever, exceeding 100. (Exhibit B).

12. Given my time constraints, and desire to keep opposing counsel and the Court well, I thought it appropriate to inform my case manager I have a fever. I mailed my documents into the Court prior to falling ill. (Id. 3DI 82, 84)

13. Since the subject of this motion relates to the Clerk's office's misfiling and other mistakes or misconduct by the Clerk of her agents, including my case manager, it is not appropriate for the Clerk to be the judge in her own case.

14. I am entitled to an impartial judge, in accordance with the First and Fifth Amendment procedural and substantive Due Process protections to defend the exercise of my fundamental rights, without unequal disparate treatment in violation of my right to Equal Protections, based on pro se in forma pauperis animus, or religious-political-poverty animus, as a party of one or in a class of pro se filers.<sup>1</sup>

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<sup>1</sup> US Amend I, V. (See, *Schweiker v. McClure*, 456 U.S. 188 (1982) reversed on other grounds; *Gibson v. Berryhill*, 411 U.S. 564, 570 (1973); *Ward v Village of Monroeville*, 409 US 57 61-62 (1972) ("Petitioner is entitled to a neutral and detached judge in the first instance."); *In Re Murchinson*, 349 US 133, 136 (1955); *Tumey v State of Ohio*, 273 US 510 (1927); *Withrow v. Larkin*, 421 U.S. 35, 46 (1975); *McCool v. Gehret*, 657 A.2d 269, 277 and 280 (Del. 1995) ("excluding evidence [in my case emails] of efforts to influence a witness' testimony [to

15. I request this Order be overturned in its entirety.

16. I have a right to know whether my filings have been accepted by the Court in a timely manner, so as not to foreseeably prejudice my case, and my matters in 8 other forums relating to reciprocal attorney discipline.

17. I am backed up and have not started my for cause motions in three courts due the next 2-3 weeks. In addition, it is unclear what my status is in the other three jurisdictions. It is reasonable for me to follow up on motions made to protect my speech, religious belief, association and right to petition, in this court. It is unreasonable and unfair for this court to wait a week and a half to address my concerns.

18. It is unreasonable to create obstacles or additional burdens upon *pro se in forma pauperis* claimants for the convenience of the court, at the cost of injustice, in the form of loss of my time from my other matters where I must assert rights timely in order to prevent waiver. I am being persecuted for my faith in Jesus Christ, and my First Amendment speech, exercise of belief, association, and my right to petition the courts. My faith in Jesus Christ is the most important

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exclude evidence] constitutes reversible error. ....“Opinion testimony by a judge creates the appearance of partiality on behalf of a litigant, is greatly prejudicial to the adverse party...”); *Inc. v. Lopez*, CIV. No. 14-1223 (PG) (D.P.R. Oct. 27, 2015); *United Church of the Medical Center v. Medical Center Comm'n*, 689 F.2d 693, 701 (7th Cir. 1982); *Utica Packing Co. v. Block*, 781 F.2d 71, 77 (6th Cir. 1986); *Hammond v. Baldwin*, 866 F.2d 172, 177 (6th Cir. 1989).

matter in my life. I should not be punished for my religious beliefs, nor should I receive disparate treatment based on the court's disparate treatment towards me, as a class of one, or towards all pro se, in forma pauperis claimants.

19. The Court threatens me with sanctions knowing going into debt by penalties or otherwise violates my religious beliefs in violation of my First Amendment rights. I have drafted a number of petitions relating to this.

20. I am under great time constraints and have fallen ill with a temperature exceeding 100. I emailed my case manager and opposing counsel on August 29, 2022, and August 30, 2022, as my condition worsened. (3DI-84-85).

21. My case manager, Pamela Batts appeared to mislead me to cover her mistakes or misconduct twice. The Court's order prevents me from uncovering evidence in support of my motion for relief. (3DI-82).

22. Over the weekend I was so upset to learn the Exhibits appeared to be doctored to remove my case manager's email address at 3DI 81-5 Page 3 Date filed 8/25/2022. (3DI 81)

23. I do not know how the address was removed, and whether it was removed from another Third Circuit filing or District Court filing I downloaded it from.

24. I know that Pamela Batts had an interest in not having her email on the record, to prevent another court from calling her as a witness for another

reciprocal matter. I thought someone removed Pamela Batt's email address in the Third Circuit or the Delaware District Court to conceal evidence. I thought maybe she did, and I should ask her.

25. The disciplinary proceeding in the state court was brought, in part, to conceal the Chancery Court's similar doctoring of my filings. (D.I. 2, 43)

26. I do not want Pamela Batts to get into trouble. (3DI-82). I contacted her in order to avoid embarrassing her before the court by adding it to the list of other potential mistakes and misconduct by the courts outlined in my second corrected motion, and in my complaint below at DI 2, 43, and other filings on the record.

27. The state courts terminated the staff member who doctored my pleading. I desire fair treatment to me, and other similarly situated pro se in forma pauperis claimants without additional obstacles causing a substantial burden, by prejudicially documents, but for the exercise of the right to defend Fundamental rights. US Const I, V, XIV.

28. On Monday 8/22/2022, I contacted the Court to alert them paper filings were coming their way for the disciplinary matter, not the civil rights case. (3D.I. 77, 78, 80, 81, 82, 83); (See Attached, Exhibits C through G incorporated by reference in their entirety.)

29. I was transferred to Desiree's email, where I learned she was out until August 31, 2022, leaving me with about half the time prescribed by statute to draft a for cause motion. *Id.*

30. I contacted the Court again 8/22/22, and told a staff member to please file the mailings I previously sent, which would arrive this week in the disciplinary case.

31. The staff member said she would relay the message to Desiree’s team, and I should not worry, “the documents will not be sitting on Desiree’s desk.”

32. After my call, I emailed opposing counsel and my case manager to provide an update that mailings were coming in for the disciplinary matter, not the civil rights case. My case manager appeared to acknowledge she knew the paper mailed filings were for the disciplinary case, and not to file them for the Civil rights case. Id.

33. One disciplinary mailing was filed in this civil rights case despite my efforts to prevent the same. (3DI 77) Worse yet, they were scanned in a prejudicial manner, with the Order highlighted, exhibits not separated, and documents in my defense faint. I contacted the court and left messages, and attempted to contact my case manager to correct the misfiled document.

34. I filed a letter, incorporated herein by reference, with the court to strike DI 77. (3DI 78). My case manager indicated “she thought it was filed by



emergency motion.” Yet, if you scroll down, you will see the envelop at (DI 77 at page 243-244).

35. I am concerned that case managers do not carefully review documents, separating them correctly for all pro se filers. I received another pro se claimants in forma pauperis filings by the Third Circuit Court’s mistake. Professionalism requires the court’s agents to care for those they serve, as opposed to sacrificing the right to petition for productivity because of carelessness or worse, bad faith obstruction of pro se in forma pauperis petitioner’s access to the courts causing a substantial burden for the class of the poor or pro se claimants, or merely to me as a party of one.

36. The Order requests I do not file emergency filings unless there is an emergency.

37. The only emergency filing I attempted to make, which did not appear to be accepted by the court, related to forwarding the exact email filings I filed with the Delaware Supreme Court, by forwarding the same, to show they were removed from the docket, along with the docket I filed with the US Supreme Court in Kelly v Trump 21-2255, and an updated docket where 4 items were missing. I filed the same motion on the docket 3DI-41-46, incorporated herein by reference in its entirety. So, there was no need to consider the emergency motion.

38. I believed that filing was a true emergency. I had hoped this court may have been able to prevent by preventing additional loss of fundamental rights by an immediate TRO. I was able to regain access to PACER, which may have been down for maintenance.

39. Emails are material to my pleading, and the Clerk's office cannot conceal their own mistake or misconduct by directing me not to provide emails that uncover communications showing my case manager's communications and knowledge of the events.

40. The Order must be overruled.

41. The disciplinary proceeding was brought inter alias to cover up the State Court's office's doctoring up my filing, firing staff who I alleged disparately treated me, and removing my pleadings to conceal evidence in my favor to fix both this civil rights case and the disciplinary proceeding against me. (3DI

42. When Pamela Batts spoke to me on the phone, she indicated she thought I had made an emergency filing. I did not.

43. If she scrolled through the document, she would see at page 243-244 the proof of mailing. She know I had the mailings coming in for the disciplinary proceeding.

44. My case manager exhibited lack of concern and professionalism by failing to scroll down at the bottom to see at page 243-244, the proof of mailing,

and a violation of moral ethics for making excuses instead of shedding light on the mistake to rectify the situation. (Exhibit I)

45. I desire to keep a different docket item of the same filing, of a report of discipline on the docket. I sought to strike the last paragraph by letter. 3D-74-75, incorporated herein in its entirety. (3D 74-75)

46. This Clerk indicated they would use my filing for any purpose they saw fit. (3D 76).

47. It appeared after I called the Third Circuit and spoke with Desiree concerning the motion to strike the last paragraph of the letter regarding reporting to the Third Circuit, a reciprocal disciplinary proceeding resulted.

48. The reason why it is important to me to remove 3DI 77 from the docket as filed in careless error in disregard to my advance notice to the Court, or in bad faith by the court, is not only to prevent future abuse, mistreatment and mistakes by the court towards pro se or in forma pauperis filers, or me, but also because the manner in which it is filed is prejudicial. I discussed this concern in my Corrected Second Motion to strike it from the docket. 3D-82

49. I filed a Second Corrected Motion because the issue of equal access to the courts for the poor and pro se filers and me in defense of my First Amendment exercise of rights is important. Disparate treatment to the detriment of those

without attorneys, based on court staff carelessness, unconcern and misfilings potentially obstructs other claimants access to the courts beyond me is too.

50. It is unacceptable to deny me, or a class of Informa pauperis pro se claimants equal treatment by the courts by creating additional obstacles by sanctioning them when they move the court to correct filings the claimants believe were filed in bad faith or in error.

51. Justice and equality for all must be upheld for all, not merely by those with social or physical capital.

52. Injustice for the poor appears to be the manner the courts behave, if the manner courts have conducted themselves towards me in the State and federal courts, is the same manner they treat all in forma pauperis pro se clients. This is not acceptable. This needs to be corrected, without punishment, with improvement.

53. When I first starting receiving Court filings through email, by the Third Circuit for matter 21-3198, I received another person's confidential *in forma pauperis* filing relating to financial information and alleged crime. (3DI 6) I notified the Court.

54. When people plead for help to the Court, they often share their most heartfelt sensitive requests. To heartlessly, carelessly not review it, when the court usually seals this, and send it to another person, shows this court cares more about

money, doing a job, convenience, not the people they serve who petition this court for help.

55. The Courts' duty is to serve justice, not greed by focusing its eyes on productivity, avoidance of costs and convenience exchanged for the cost of selling souls, individuals and individual liberty for government, and government backed private or foreign partners' interests.

56. The disparate treatment I received by state and federal courts is not acceptable, no matter how repugnant the government finds my belief in Jesus Christ. Defendants assert my beliefs in Jesus are illogical. They claim it to be a reason they brought the state disciplinary petition against me. (DI 2, 3DI-82)

57. I have religious beliefs against healthcare, mental healthcare, organized charity, debt, and worshipping business and profession as guide and God, in place of God.

58. I believe people sin for making money their guide and God. I believe those who seek to control people by indebtedness or material reward, as opposed to caring for people while safeguarding their liberties within the limit of protecting the liberty of others, sin. I believe Jesus calls them children of the devil, because they tempt people's desires to burden their will, to their dictates. This is similar to the snake in the garden tempting Eve.

59. Jesus teaches you cannot serve both God and Money. I believe those who serve money as guide, disobey Jesus and lose eternal life on the last day, should they not repent. I believe people who seek to control others by fines, monetary penalties and monetary rewards, do not serve justice by correction with mercy.

60. I am not controlled by money as God and guide, to be controlled by the state, or government backed private or foreign partners by purchase, as opposed to justice. I am free in Christ. I am not for sale. I am a child of God, not business greed, which I believe is the mark of those who choose the way to hell. I keep myself separate, holy, not forcing my beliefs upon others. I merely share them, unashamed, as truth. I should not be punished by the state or any court for defending my personal religious-political beliefs.

61. I sought safety by petitioning the courts from government incited religious-political persecution endangering my property and my person. People threw things at my vehicle. Others cast insults on me based on my perceived religious-political beliefs. Someone talked about shooting me. Another person appeared to threaten me with harm based on my perceived religious-political beliefs. A young man came to my defense. Someone shot into the home of my friend based on their political beliefs. I was scared of being killed, economically or physical or socially persecuted based on my belief in Jesus and political beliefs.

I asked the Court for help. I am in trouble for asking for help in Delaware. I am in trouble for asking you for help, gaining a fair proceeding. Please do not deny me access to the courts based on the convenience of the courts. The courts should not deny people access because they do not want to upload documents. DI 2.

62. The Courts I have asked for help, persecute me and now threaten sanctions should I include evidence on my material need for such assistance.

63. The government is forbidden from persecuting me, a private citizen, not a government employee or agent, but for the exercise of my religious belief through my speech under US Amend I, XIV. I should not face government persecution. If the state looks as citizens as people to purchase who owe them and must contribute to their government, none are free. We are slaves of the state who exploits the people to serve greed, as opposed to serving the people to uphold justice.

64. Hiding mistakes and bad choices, by preventing their admission as evidence, does not improve the administration of justice. I desire mercy not sacrifice, to improve, not condemnation or sacrifice.

65. This Court acts in contravention to my First Amendment right to access to the Courts applicable to the Federal Courts via the Equal Protection component of the 5th Amendment, and the state Courts pursuant to the 14<sup>th</sup> Amendment, towards me, a member of class of one due to religious beliefs against

incurring debt combined and due to utter poverty, by causing an obstacle to my access to the courts to exercise my fundamental rights. The Clerk's Order must be overturned. See, *Abdul-Akbar v. McKelvie*, 239 F.3d 307, 317 (3d Cir. 2001) ("This requires us first to determine whether Appellant is a member of a suspect class or whether a fundamental right is implicated. Neither prisoners nor indigents are suspect classes."); See, *Harris v. McRae*, 448 U.S. 297, 323, (1980) (noting that poverty is not a suspect classification); (*But see, Lewis v. Casey*, 518 U.S. 343, 370 (1996) "[A]t all stages of the proceedings the Due Process and Equal Protection Clauses protect [indigent persons] from invidious discriminations.")

66. "Because this case implicates the [Constitutionally protected First Amendment rights of speech, belief, exercise of belief, association and the] right of access to the courts," the government's disparate treatment towards me, based on poverty, is still unconstitutional under/ a strict scrutiny basis test. Citing, *Tennessee v. Lane*, 541 U.S. 509, 533 n.20 (2004).

67. The Supreme Court noted, "There can be no equal justice where the kind of trial a man gets depends on the amount of money he has." *Lewis v. Casey*, 518 U.S. 343, 370 (1996); (internal citations omitted)

68. While, poverty is not a suspect class, my right to meaningful access to the courts, despite the inherent burden of poverty, and my religious beliefs and strongly held religious exercise relating to my religious belief against indebtedness



are protected. My right to speech, belief, exercise of belief, association, Equal Protection, substantive and procedural due process are a protected source of the Delaware District civil rights proceeding too. US Amend I, V, XIV.

69. Fundamental rights are implicated. Defendants violated my equal protection, as a class of one, procedural and substantive due process opportunity to be heard, to prepare and present evidence, to subpoena witnesses, to cross examine my accuser, and Defendants persecute me and seek to defame my character and take away my property interest in my license to practice law but for my exercise of Constitutionally protected conduct, in violation of my freedom to petition concerning my religious-political speech, religious-political exercise, religious-political belief, religious-political association, and association as a party, attorney, Democrat and Christian when I believe there has been a grievance committed against me.

70. Justice Stevens, with whom Justice Brennan, Justice Marshall, and Justice Blackmun joined, in dissenting of US Supreme Court in *Murray v. Giarratano*, 492 U.S. 1, 18 (1989) recognized,

“When an indigent is forced to run this gantlet of a preliminary showing of merit, the right to appeal does not comport with fair procedure. . . . [T]he discrimination is not between ‘possibly good and obviously bad cases,’ but between cases where the rich man can require the court to listen to argument of counsel before deciding on the merits, but a poor man cannot. . . . The indigent, where the record is unclear or the errors are hidden, has only the right to a meaningless ritual, while the rich man has a meaningful appeal.” Douglas, 372 U.S., at 357-358

71. The Court's misfilings or misconduct relating to filings, based on either religious-political or poverty animus, or exercise of fundamental rights or attempts to conceal misconduct or mistakes must not be permitted to deny claimants of access to the courts, or elimination of evidence material to their motions.

72. In my state case, a court staff who was terminated doctored up a subpoena, essentially testifying without cross examination. This caused confusion and additional filings. I did not understand why I could not serve local counsel. My case Kelly v Trump should have been kicked out for failure to serve him. Yet, the Court kicked it out because it found my arguments against the establishment of government religious beliefs, which endangered my life and property to be without merit. (3DI 82)

73. The state Courts were wrong to terminate the two staff who made mistakes. It is possible lay people did not know you could not write on pleadings without parties knowing on the record, as if testifying as a witness without ability to cross examine them in violation of my 6<sup>th</sup> Amendment rights. (See the attached letter, dated November 6, 2020 to the Chancery Court, the attached doctored up subpoena on the record, and the attached same subpoena I received without hand written notes on it)

74. Instead of destroying people's lives, hiding them in darkness, eliminating them, please help them improve.

75. The staff will likely aid more *in forma pauperis* claimants as the economy becomes worse . Fewer people will be able to afford lawyers.

76. People can care to look into matters further. Computers cannot. I would prefer the court to consider helping staff serve others better by looking at others as people to serve as opposed to productivity.

77. I am quite fatigued., a little dizzy with fever. I took covid tests, which were all negative.

78. I am in tears by the Courts cold hearted treatment. I called the District Court. I indicated I have a fever, and I did not want the staff to get sick.

79. They still require I bike 8-10 miles to the post office to file pleadings.

80. I am considering filing a shorter letter with the Court, wherein I request additional time, to prevent the trip, and potential exposure of sickness to others.

81. The staff at the District Court, indicated they have gloves, and I need not worry about getting them sick.

82. Yet, I do worry because I care about them and others. That is my nature to value people as more precious than productivity or money.

83. I will not email my case manager too often.

84. Yet, she very rarely answers her phone, and others did not last week.

85. I do not have voice mail. I prefer not to leave a message because I am not easily reached by phone.

86. In my state case, Judge Clark from the Court of Common Pleas attacked me at BJs in an attempt to get me to drop my case.

87. The Chancery Court staff misled me to almost miss my filing deadline.

88. Defendants or their agents sent threatening letters to cause me to forgo my RFRA case against former President Donald Trump.

89. One of the letters revealed evidence that the Delaware Supreme Court instigated the wrongful attacks against me during my live case, *Kelly v Trump*.

90. I am a Christian. I believe justice in the courts is a greater command by God, preventing harm in this life and eternal death forever. *Amos 5:15, Matthew 23:23*.

91. I pray this Court allows me the opportunity, not guarantee to plea for justice in a fairer manner than the state courts.

Wherefore I pray this Court grants this motion.

August 30, 2022

Respectfully Submitted,

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

meghankellyesq@yahoo.com  
302-493-6693  
Bar No 4968 DEACTIVE (4, 821)

34012 Snow nør Dr.  
Dagsboro, DE 19931



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Case: 21-3198 Document: 77 Page: 244 Date Filed: 08/22/2022

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 Third Circuit Court of Appeals  
 601 Market Ste 18614  
~~19061~~ Philadelphia, PA 19106

### THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	§	APPEALS COURT
Respondent, Appellee	§	CASE NUMBER:22-3372
	§	DISTRICT COURT
	§	Misc. No. 22-45
v.	§	DISTRICT COURT
United States District Court,	§	JUDGE: The Honorable Paul D.
Eastern District of Pennsylvania	§	Paul S. Diamond, Judge

Appellant Respondent Meghan Kelly’s Motion to Correct the Record, specifically District Court Docket Item, DI 12 under Rule 10 (e)(2)(c) and Rule 27

I Appellant Meghan Kelly, pursuant to the Court’s equitable powers and Federal Rules Appellate Procedure, Rule 10 (e)(2)(c) and Rule 27 move this Court to strike the the District Court Eastern District Court Docket item (hereinafter “DI”), *Respondent Meghan Kelly’s Motion pursuant to Local Rule 7.1 (g), FRCP 52, and in addition to or in the alternative of FRCP 59(e), for a rehearing on the Court Order Denying Request for ECF access, and my corrected Motion to Stay the Proceeding until the conclusion of both Respondent’s originating disciplinary proceeding, and civil rights proceeding until final non-appealable determinations are made or the time of appeal has lapsed* located at DI 12 (“Motion for a rehearing on Stay/ECF”), and replace it with the corrected version, located at Third Circuit Docket Item (hereinafter “3DI”) 3DI32-1 through 3DI32-3-11, 3DI33-1 through 3DI33-10, 3DI34-1 through 3D34-11, and incorporated herein as an exhibit by reference. I incorporate herein by reference in its entirety as an exhibit the corrected motion to vacate the Order at Third Circuit docket item (“3DI”) at



3DI37 and 3DI38, Motion to Correct the Motion to vacate at 3DI38-1, Motion for leave to exceed the word limit in her Corrected Motion to vacate the Order, dated May 19, 2023 at 3DI40, 3DI29 through 3DI34, 3DI36 and any other 3DI I refer to. I further incorporate herein by reference any United States District Court Eastern District of Pennsylvania, District Court Docket Item (“DI”) referred to, including but not limited to my efforts to work with the Appellee who made some corrections caused at 3DI-29, the incorrectly filed DI items or changed items DI 10, 11, 12, included in part at 3DI 30, the informal letter to the Appellee court regarding misfiled pleadings at DI-13, located at 3DI-37-14, the corrections the Court made in response to the letter, at DI 15, 16, 17, attached hereto and incorporated herein at 3DI-31 with errors by placing the same motion on the docket below, and aver:

1. Fed. R. App. P. 10 (e) provides:

“e) Correction or Modification of the Record.

(1) If any difference arises about whether the record truly discloses what occurred in the district court, the difference must be submitted to and settled by that court and the record conformed accordingly.

(2) If anything material to either party is omitted from or misstated in the record by error or accident, the omission or misstatement may be corrected and a supplemental record may be certified and forwarded:

(A) on stipulation of the parties;

(B) by the district court before or after the record has been forwarded; or

(C) by the court of appeals.”

2. I move this Court to grant my request pursuant to Fed. R. App. P. 10

(e)(2)(c) by this Court of appeals.

3. There is no opposing party. The Appellee is the US District Court Eastern District of PA District Court in name only.

4. Stipulation is impracticable since the Appellee is the Court. Stipulation is not needed because I am seeking relief under section 10(e)(2)(C), not under section 10(e)(2)(A). Additionally, it is not necessary for the District Court to grant relief either under section 10(e)(2)(B).

5. Moreover, the Appellee creates an obstacle for me to draft a motion. Appellee is no longer accepts filings in the same manner as I filed below by email, making it more difficult for me to file due to poverty creating a substantial burden.

6. Appellee also entered an Order denying a Motion for ECF filing rights not yet ripe since I had not filed any motion, which was not needed or relevant at the time. See, DI-3-DI-7.

7. Now the court, Appellee acknowledges I never filed a motion. The Appellee Court requested I submit a motion for ECF filing rights, despite its previous Order denying me the same. See. 3DI-27 I incorporate herein by reference in its entirety.

8. Appellee may be booby trapping me again to waste time to create an obstacle to my right to petition. The issue was not ripe or relevant at the time of the Order. See DI 3, DI 7, 3DI Please see the attached 31st affidavit, as an exhibit incorporating the communications by appellee through emails as admissions,

outlining and confirming the fact I never filed a motion for ECF, and the Court now requires I file a motion. I am scared.

9. Nevertheless, the Court below would likely not object to my replacement of the flawed DI 12, with the Corrected Motion for a rehearing on Stay/ECF since the court attempted to work with me per my informal request I incorporate herein by reference. DI 13, 3DI-29, 3DI-30, DI 31.

10. The Court appeared to give up on its attempts rather than continue to correct the record by filing a notice for a hearing prior to addressing outstanding motions or affording me the right to draft a for cause Motion in response to the disciplinary order. DI 14.

11. I called, drafted emails and an informal letter requesting notice on what the hearing was on since I had a number of outstanding motions it could be on. DI 15, DI 16.

12. Instead of providing adequate note, the Court went back to making corrections for which I am grateful. The Court two motions for orders on outstanding orders the Court inadvertently uploaded as exhibits instead of as pleadings by placing them on separate docket items, DI 17, 18, and 19. Albeit the court uploaded one motion twice.

13. The remaining problem is Motion for a rehearing on Stay/ECF DI 12.

.

14. The Court without explanation denied my motion for a stay and corrected motion for a stay. DI 6. DI 7.

15. I intended to draft a motion for a stay in this case, where if granted I would agree not to file documents until the stay is lifted as to accommodate my case manager and the clerk in light of the order. 3DI 35.

16. In Federal Rules of Appellate Procedure Rule 8 (2)(A)(i)(ii) regarding stays requires:

“(2) Motion in the Court of Appeals; Conditions on Relief. A motion for the relief mentioned in Rule 8(a)(1) may be made to the court of appeals or to one of its judges.

(A) The motion must:

(i) show that moving first in the district court would be impracticable; or

(ii) state that, a motion having been made, the district court denied the motion or failed to afford the relief requested and state any reasons given by the district court for its action.”

17. I intended to draft a Motion for a stay until the completion of my civil rights case pending appeal and potential remands. Should the civil rights case remain alive, I would likely be fighting multiple parties, some of whom are brilliant judges in defense of the exercise of my fundamental rights without interference and punishment but for the state’s disagreement with my religious-political beliefs, contained in my speech and petition, exercise of other rights to petitions, to run for office and to cover up about 20 years of State misconduct including compelled violations of religious beliefs.

18. In order to file a stay with this Honorable Court I must show my attempts to move the court below. My attempts were inaccurately prejudicial and incorrectly docketed below which may cause this Court to deny my relief.

19. A stay seems more viable as I require meaningful opportunity to assert my rights in the civil rights case, while I also seek meaningful opportunity to appeal the Appellee's order below to prevent 6 new law suits. I cannot do all things at once, and was already deprived of my First Amendment right to petition in three matters despite my assertion of adequate time in the form of stays. 3DI 38-1.

20. An inaccurate record makes it impossible to have a fair meaningful opportunity to be heard on appeal or below when my electronically filed not paper filed pleadings are inaccurate, have additional papers or are not uploaded to the docket completely.

21. My First Amendment right to petition and my 5<sup>th</sup> Amendment right to be heard on appeal are vitiated when my petitions are not accepted by the court accurately, without extraneous papers, fully or missing material documents.

22. I filed a corrected Motion for a stay below. (DI 6-7) The Court denied it without an explanation. Id. I filed a Motion for a rehearing on denial of the stay. DI 12. The Court misfiled the exhibits to the Motion for reargument on denial of a stay. 3DI-29. So, I filed a letter for corrections. DI 13 I believe the Court may

have taken off someone else's medical records from my pleadings per a staff's comment, but other documents appear to be out of order as of the latest ECF email notice I received. 3DI 30-8, 3DI30-9, 3DI30-10, DI 12-45 through DI 12-47. This denies me of a fair opportunity to be heard by prejudicing me and this appellate court because I cannot easily find the documents I referred to therein in the voluminous misfiled exhibits. Gail Olson, the case manager requested a list to aid in correcting the filings. So, I spent hours over a weekend resending each and every exhibit in order, with a document list outlining the order with the title of each email. These are not docketed or attached. Gail Olson indicated the lists I spent hours on was not what she wanted. The docket remains a mess.

23. DI 12 is misfiled with over 2000 pages of misfiled documents which are critical for the proceeding below as including the material docket items in the Delaware Disciplinary case this reciprocal matter arises from.

24. They are really bad. It was not Exhibits A, B, C, D,... AA, BB, CC... but the alphabet is uploaded all over the place, missing my exhibits so as deny me the opportunity to be heard in full and fairly in DI 12. The exhibits are out of order for example Exhibit B is at DI 12-32 instead of after Exhibit A located at DI 12-6.

25. An inaccurate record deprives me of a meaningful opportunity to be heard on appeal before this Court and potentially before the US Supreme Court in this disability reciprocal proceeding. It looks like I threw things all of the place when I provided it to the court in order. The Court merely carelessly docketed it when Gail Olson, the case manager was out.

26. Appellee and this Court may not deprive me of the First Amendment right to petition by refusing to docket the petition accurately, despite the voluminous amount of pleadings to consider stemming over the course of 20 years in violation of the Equal Protections Clause of the 5<sup>th</sup> without an important justification somehow more important than the right to petition, narrowly tailored to uphold that justification.

27. The misfilings prejudice me, and prejudices other pro se filers, including the pro se filer whose pleadings were placed on my docket in error, should they still remain on the docket. This issue is capable of repetition, and yet evading review since inaccurate.

28. The Courts should not fear making mistakes and correcting them. That is why people staff are not replaceable. People staff are important because people make mistakes and need other people's help to correct them. With automation we are out of luck if our mistakes fall outside the algorithms.

29. The problem is when courts cover up their mistakes by attacking those who point them out, ruling against a party because they do not want to fix them, or fire staff like what happened in Kelly v Trump. Two staff were fired.

30. When I petition the Court I seek to improve the administration of justice. Threatening people with sanctions or threatening imperfect staff by firing them destroys and makes the world worse off by injustice.

31. I care about the two staff in the Delaware case who were fired. I am imperfect as this court knows. I am a terrible typist writing under duress without adequate time to plead which prejudices my presentation before this Honorable Court.

32. Yet, perfection is not an element for a private citizen to be afforded Constitutional rights, even the right to petition, especially in criminal like matters such as this proceeding. As a lawyer, albeit placed on disability in DE, I know that I don't have rights unless I assert them. They may be waived. I would rather appear a fool than be a fool for waiving my First Amendment right to religious belief in Jesus.

33. My mom thinks the courts think I am dumb, and I should give up. I would die before I give up on my religious belief in Jesus, and standing up for my freedom and the freedom of others to believe by the dictates of their conscience as



opposed to the dictates of the dollars by whoever buys them under the current case law which eliminates freedom of religion under the guise of safeguarding it. The recent high court cases make freedom for sale, not free by entities who force their beliefs upon their employees in order to buy or sell, or in my case to even have a government issued license to buy and sell. This is government backed private establishment of government religion based on business not freedom.

34. I believe people sin for acting like mobsters by using money and might to get their will be done instead of using their minds, to think, to talk to persuade others without economic or physical threat, leaving the door open to learn from one another. I believe people sin by using weapons and wallets instead of words in disagreements. I believe that God teaches “justice in the courts is a command” to care for not control people. *Amos 5:15* I believe courts are the place to resolve disagreements not the banks and not the war barracks.

35. I am cognizant there are 91 central banks, maybe more now, who have formed an alliance called the Network for Greening the Financial System (“NGFS”) to take over the court’s authority of rendering justice under a credit debt system of control. This new economic government global system enslaves people by forcing their collective will be done, making the mark of beast the Bible speaks of reign by threat of economic and potential physical force the norm replacing the impartial rule of law.

36. The Banks will take over the courts and the government if the courts do not stop it.

37. I write under great duress. I am injured, with a permanent injury wherein I invoke my right to life. I had an ovary removed when I was a teenager. The doctors said I would have my period every other month. They were wrong. I have had my period every month, and become dangerously dehydrated, losing about five pounds of water weight for a week or so each month. I require time, to sustain my health due to the harmful healthcare I received as a youth. I assert my First Amendment right of religious exercise of the right to live, and not harm my health or die for the sinful lawless lusts and vanities of mere men in place of God. I attach my health record, my healthcare studies, some of my proposals to improve our harmful deadly healthcare I wrote about when I ran for office in Delaware and other information I incorporate herein by reference as an exhibit hereto at 3DI17-4 page 1 to 9. I have religious objections to healthcare. I outline some of those objections at 3DI-2 pages 7-19. I also attached at 3DI2 page 22-page52, dangerous healthcare agendas by affiliates of the World economic Forum which are coming into fruition during our time. On an aside, it appears that my mailed papers at 3DI2 were uploaded with errors which are not critical to correct. For instance, there is an error at Page 71 and other pages.

38. Each month I lose five pounds of water weight. This causes serious harm to my health and life if I am not afforded time to alleviate it. I have not been able to alleviate it, and have been in a dangerous state of dehydration for months.

39. More than one eye doctor also told me I am at high risk for blindness by a retinal detachment, and that if I should lose vision I should seek immediate care to prevent blindness.

40. I believe dehydration increases the risk. I recently lost vision in one eye, and am recovering. That injury was not a retinal detachment. Yet, it left an increase in floaters which increases the risk that I will require surgery to prevent blindness. 3DI22-4 to 3DI 22-5. I have an appointment with an eye doctor to check my vision on June 14, 2023. I am scared. I do not want my health to worsen, and I do not want to die.

41. I am also in duress since I have multiple law suits I must address to preserve my private exercise of fundamental rights including my right to believe in Jesus Christ without eliminating my right to buy and sell but for the government's belief my religious belief is a disability.

42. One law suit is the civil rights case before the Third Circuit *Kelly v Swartz, et. al.* This civil rights case relates to the Delaware Disciplinary proceeding this reciprocal law suit arises from. DI 1, DI 2.

43. While I intend to place an ADA claim in the civil rights case for lack of asserted accommodations to sustain my health which has interfered with my meaningful access to the courts during the Delaware Disciplinary proceeding, the state deemed my religious beliefs a disability, not my permanent physical requirements or limitations. 3DI21-5, 3DI21-6, 3DI21-7.

44. The Delaware Disciplinary procedure was so lacking in notice or opportunity to be heard as to constitute a deprivation of due process. 3DI21-7. The State of Delaware (“State”) callously required I attend a hearing without proper notice, adequate time, without opportunity to call witness, and so many more defects while I was ill recovering from the shingles and allergies. The State cared not for any health ailments. It did not deem my physical health a disability by requiring I attend. Frankly, I showed up after a sleepless night because I did not want to be placed in contempt. The State had notice of my health limitations. I provided them in my answers to the Disciplinary petition. I also provided notice of my health limitations and required needs to preserve my life and health in all of my cases before the Delaware Courts, including but not limited to *Kelly v Democrats* and *Kelly v Trump*. 3DI21-3-3DI21-4. The State’s case was brought to cover up almost 20 years of Constitutional deprivations and to punish me for my private exercise of Constitutional rights including but not limited to my private-First Amendment right to petition the court to alleviate substantial burdens upon my

religious exercise, run for office, private right to religious-belief, private exercise of speech and other rights.

45. My First Amendment right to believe and exercise my faith in Jesus Christ is the most important freedom I seek to safeguard without punishment by elimination of my government license to buy and sell as a lawyer but for my religious belief.

46. My faith in Jesus is genuine even if the State finds it repugnant.

47. I am also under duress because I found out the plan to crash the economy to get out of the biggest bill falling due globally, the baby boomers' retirement, healthcare and social security globally. I tried to tell the Delaware Chancery Court and the Delaware Supreme Court about the baby boomers getting duped out of social security and retirement by filing letters in *Kelly v Trump*. I knew this economic downturn was schemed to happen. I do not want old people to be harmed. I want the courts to unravel the schemes to reverse or prevent the economic crash to prevent the schemed overthrow of the government.

48. I proposed a way to pay for the baby boomers' social security and retirement unearned required in my Complaint in the civil rights case *Kelly v Swartz*. The ideas I proposed are not original. They are based on the teachings of the Bible. The ideas I proposed are also based on the same ideas President Lincoln and Kennedy. There is a way out to reverse or prevent the crash.

49. I am not sacred of having bad ideas, or brainstorming new ones. I do not choose to standby and allow people, especially old people to be harmed by schemes. I drafted articles of impeachment to safeguard the free speech of NFL players without government incited private firings under 18 USC 227. I drafted articles of impeachment in an attempt to prevent kidnapping of babies at the border while safeguarding due process. Even if I fail, someone else smarter than I, like you judges, may succeed in loving others better than I tried.

50. I am in tears because I am scared this Court may not consider saving old people, Americans, America and the world in my civil rights case or in a different case due to the adjudication of disability I seek to overturn. The Courts are our only hope of a hero. I placed two readable books by the World Economic Forum on 3DI30-7 and 3DI30-8 outlining schemes under the guise of predictions or agendas in hopes this court might read them to understand them in order to stop them.

51. It is also upsetting to consider all of the Constitutional deprivations by the State of Delaware I will have to draft a Motion for a rehearing or reargument in the civil rights case soon. I incorporate herein by reference my reply to the ODC's corrected response to my objections against discipline herein by reference which includes additional deprivations of my fundamental rights. 3DI21-7.

52. I also am in duress as I have another deadline I must meet or lose the right to petition by Tuesday, May 30, 2023 relating to PA reciprocal discipline

53. I await with fear to learn how I may appease the Court without waiving my asserted Constitutional rights. 3DI35-40. See Bible, *Matthew 5:4*, *Luke 6:24- Luke 6:26*.

54. I am sorry for my errors and typos, and my feeble attempts of making it easier on the case manager and clerk only to make it more difficult.

55. I am not sorry for standing up for my religious beliefs and my belief in the courts and in you in seeking justice for all by asking you for help by exercising the First Amendment right to petition.

56. Please do not throw me away as unworthy of rights.

Wherefore I pray this Court grants this Motion.

May 27, 2023

Respectfully submitted,

/s/Meghan Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
meghankellyesq@yahoo.com  
(302) 493-6693 (3,801 words)

**CAUTION - EXTERNAL EMAIL:** This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.





# american family care URGENT CARE

## LAB REPORT

Shaakira West  
[REDACTED]  
[REDACTED]  
[REDACTED]

Test Date: 10/12/2022

Test Time:  
[REDACTED]

Patient ID: [REDACTED]

Date: 10/12/2022

Ordering Provider: Kevin Kramer, DO

NPI: [REDACTED]

Phone: [REDACTED]

### LAB TEST/RESULT:

SARS-COV-2 COVID19 W/OPTIC [87811]

SARS-COV-2 COVID19 W/OPTIC [87811]: Positive Abnormal (Normal = Negative)!!

*Kevin Kramer DO*

The COVID-19 Antigen Test is a lateral flow immunoassay intended for the qualitative detection of nucleocapsid protein antigen from SARS-CoV-2 from individuals with or without symptoms or other epidemiological reasons to suspect COVID-19 infection when tested twice over three days with at least 36 hours between tests. This test is authorized for non-prescription home use with self-collected direct anterior nasal (nares) swab samples from individuals aged 15 years or older or adult collected anterior nasal swab samples from individuals aged two years or older.

The COVID-19 Ag tests have not been FDA cleared or approved. They have been authorized by the FDA under an emergency use authorization. The tests have been authorized only for the detection of proteins from SARS-CoV-2, not for any other viruses or pathogens, and are only authorized for the duration of the declaration that circumstances exist justifying the authorization of emergency use of in vitro diagnostics for detection and/or diagnosis of COVID-19 under Section 564(b)(1) of the Federal Food, Drug and Cosmetic Act, 21 U.S.C. § 360bbb-3(b)(1), unless the declaration is terminated or authorization is revoked sooner.

Herbert Woods  
Shaakira West  
P O Box 192  
Cheltenham PA  
19012

**UNITED STATES DISTRICT COURT  
Eastern District of  
Pennsylvania**

Herbert Woods AND Shaakira West,  
PLAINTIFF,  
VS.  
REVERSE MORTGAGE SOLUTIONS,  
ITS SUCCESSORS OR ASSIGNS;  
Ocwen Financial Corporation, ITS  
SUCCESSORS OR  
Glen Messina  
Robert (Bob) Yeary  
State of Pennsylvania  
Idee C. Fox  
Joshua Roberts  
in his personal capacity  
Paula Patrick  
in her personal capacity  
Eric Feder  
in his personal capacity  
Eric Kishbaugh  
in his personal capacity  
Brandon Pack  
in his personal capacity  
Edward Levin

38 Rochelle Bila`  
39 in her personal capacity  
40  
41 Robin Robinson  
42 in her personal capacity  
43  
44 Gordon Dorsey  
45 in his personal capacity  
46  
47 DEFENDANT

**Emergency MOTION FOR AN EXTENSION OF TIME TO FILE AN  
AMENDED COMPLAINT**

- On September 20, 2022, the Court order Plaintiff Shaakira and Herbert Woods 30 days to amend complaint without prejudice, and file amended In Forma Pauperis.
- Pursuant to Federal Rule of Civil Procedure 6(b)(1), (b)(EXTENDING TIME )
- Plaintiffs respectfully moves this Court for an extension of time of 21 days until November 8<sup>th</sup>, 2022, to file the amended complaint.
- Plaintiff respectfully submits that good cause exists to extend until November 8<sup>th</sup>, 2022
- Plaintiff Herbert Woods & Shaakira West are pro se litigant.
- Plaintiff Shaakira West Has tested positive for Covid- 19 on October 12<sup>th</sup>, 2022.
- Covid-19 has triggered plaintiff other health issues.
- Plaintiff has not recovered as of date (10/17/2022).
- Plaintiff West has been advised by her doctor not to be in any public spaces and to completely isolate until symptoms reside. (That include from Mr. Woods)
- Plaintiff has attached as Exhibits A, Positive test results.
- The requested extension will provide sufficient time for Plaintiff to amend claim.
- The modest extensions requested will not burden or prejudice Defendant or any third parties, and are consistent with the just, speedy, and inexpensive determination of this action. See Fed. R. Civ. P. 1. For the foregoing reasons,
- Plaintiff respectfully requests that the Court grant this motion.
- Plaintiff respectfully submits that good cause exists to extend until November 8<sup>th</sup>, 2022. (See Fed. R. Civ. P. 6(b)(1) the Court may for good cause grant requests for time extension made before the original time expires).

DATED: October 17<sup>th</sup>, 2022

Respectfully submitted,  
/s/ Shaakira West

Respectfully submitted,  
/s/ Herbert Woods

## ORDER

## GRANTING EMERGENCY MOTION FOR AN EXTENSION OF TIME

Upon consideration of Plaintiffs Shaakira West & Herbert Woods motion is GRANTED for an Extension of time to File an Amended Complaint, the motion is GRANTED. Accordingly, Plaintiff shall file an amended complaint by November 8<sup>th</sup>, 2022.

IT IS SO ORDERED.

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	§	APPEALS COURT
Respondent.	§	CASE NUMBER: 22:37372
v.	§	DISTRICT COURT
United States District Court,	§	Misc. No. 22-45
Eastern District of Pennsylvania	§	Judge, Paul S. Diamond,

**Certificate of Word Count of**

**Motion to Reopen Case to Consider pleadings filed July 4, 2023 and July 5, 2023, Motion to Reopen the case to exercise the 1<sup>st</sup> Amendment right to petition under FRAP 40 Motions for reargument on denied motions and another potential motion**

I Meghan Kelly, Esq., certify the amount of words contained in the above referenced Motion is 4,976 words by Microsoft word count excluding caption, title, date and signature.

Dated July 10, 2023

Respectfully submitted,

/s/Meghan Kelly  
Meghan Kelly, Esquire  
DE Bar Number 4968  
Inactive license  
34012 Shawnee Drive  
Dagsboro, DE 19939  
[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)  
PRO SE (4,976 words)

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

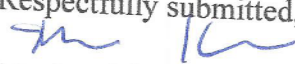
Meghan Kelly	)	Civil Action No.: 1:21-1490
	)	(CFC)
Plaintiff,	)	
v.	)	
Disciplinary Counsel Patricia B. Swartz, et.al	)	
Defendants.	)	

CERTIFICATE OF SERVICE OF  
PLAINTIFF MEGHAN KELLY'S 73rd AFFIDAVIT UPDATE

I, Meghan M. Kelly, Esquire, hereby certify on 8/28/23, I had a true and correct copy of the above referenced document, served to Defendants, through their counsel through email electronically:

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

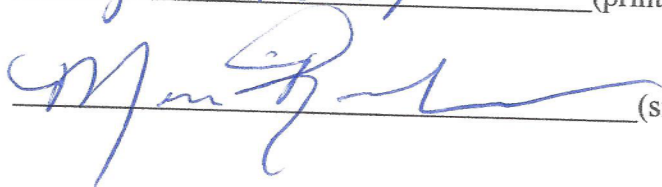
Dated 8/28/2023

Respectfully submitted,  
  
Meghan M. Kelly  
Meghan Kelly, Esquire  
34012 Shawnee Drive  
Dagsboro, DE 19939  
[meghankellyesq@yahoo.com](mailto:meghankellyesq@yahoo.com)

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

Dated: 8/28/2023

Meghan Kelly (printed)

 (signed)