

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 72nd AFFIDAVIT UPDATE

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

1. This is not attorney advice, but is based on my beliefs.
2. It has been really hard for me as I fight multiple courts after I filed this law suit since the Delaware Supreme Court order has been placed my license on inactive disabled preventing me from working in the profession of my choice, compelling me into a forced state of poverty to burden me by making petitioning even more difficult by intentional design to bend my no longer free will to the forced will of the state through the ODC or Courts reciprocal law suits.
3. The Disciplinary Order caused other courts to reciprocate in filing law suits, with limited time to draft a for cause motion or to appeal to the US Supreme Court.
4. Other attorneys whose Delaware, different state or federal license will be placed on disability, suspension or disbarment similarly face an unfair economic burden and a burden in terms of limited time to fight multiple simultaneous attacks by reciprocating courts as they appeal the Order to the United States Supreme Court by multiple reciprocal law suits. I do not want other lawyers to similarly have a hard time.
5. It is reasonable to assume most lawyers face severe economic burdens when the Court places their license on disbarment, suspension or inactive disability. The order(s) prohibit them from working as attorneys for money to pay for necessities to maintain their families and

homes, or for the stamps, paper, ink, access to research to defend their licenses, liberties and other claims to petition to overturn disbarment/suspension of their licenses.

6. The threat of automatic reciprocation creates an unfair government advantage in violation of the 5th Amendment applicable to the federal courts and the 14th amendment applicable to the states and the office of disciplinary counsel burdening disciplined attorneys' access to the courts to defend liberties, claims and infringements on licenses to practice law.

7. In my case the unfair threat vitiated my First Amendment right to petition the US Supreme Court on the original disciplinary Order and deprived me of access to the court given my poverty, limited means and inability to pay for postage, paper and ink in all cases simultaneously, religious beliefs against debt, and invocation of the 13th Amendment, without an important justification narrowly tailored to meet an important government interest that may otherwise be protected by allowing reciprocating state and federal courts to proceed after a decision by the US Supreme Court has concluded on the merits or the time of appeal has lapsed before permitting reciprocating suits to proceed.

8. This also prevents reciprocating courts from wasting resources should the orders be overturned on appeal or in civil suits based on void or voidable jurisdiction.

9. A lawyer's right to pursue the profession of his or her choice constitutes a property interest protected by the due process clause of the 14th Amendment and the 5th, and of which an attorney cannot be deprived for any whimsical, capricious or unreasonable cause, including the governments' disagreement with my religious-political beliefs contained in speech in religious-political petitions or petitions requiring the government adhere to the Constitutional laws which limits their authority.

10. I do not want other attorneys to be punished for exercising their First Amendment right to petition the government to uphold and not violate the Constitutional rule of law by invoking not waiving rights.

11. Lawyers have not exchanged their first Amendment rights for licenses to gain money. See Matthew 6:254 (“You cannot serve God and Money”) See, Mark. 8 Verses 34 to 38 (What profits a man to gain the world to lose his soul in hell the second death to be no more)

12. I believe the standardized rules the states and federal courts and even the US Supreme Court violate the notions of fairness under the procedural due process clauses by requiring lawyers compelled into joblessness to defend their licenses and liberties by the original court and reciprocating courts simultaneously as to render attorneys at such an unfair disadvantage as to inhibit their fair access to the courts under the circumstances.

13. While I have other Constitutional arguments against the rules and disciplinary proceedings on the record I should like to argue on remand, I had a hard time when a disciplinary suit was filed against me in December 2021 after I filed this civil rights case in October 2021, concluding in multiple procedural due process violations and an order requiring I fight 6 other courts or otherwise contact them so they may sue me or not.

14. I do not want other lawyers to be threatened by multiple law suits, lack of means in terms of time and money as to pressure their unfree will to the dictates of the attacker courts and state agents as to bend their no longer free will to the forced will of the state in violation of a fair proceeding by a forced proceeding. I make this affidavit to uphold justice in the courts in hopes it may assist other attorneys should this case not be remanded back.

15. The rules uniformly unfairly burden lawyers, even if it especially burdened me in my case where the obstacle was so great as to deny me access to the US Supreme Court to appeal the original disciplinary disability order.

16. The Courts should render automatic reciprocity unreasonable and unconstitutional unnecessary to an important government interest that may otherwise be protected by allowing suits after the time for appeal has concluded.

17. What makes this especially troubling is that an attorney who seeks to appeal to the US Supreme Court may face a potential law suit by the US Supreme Court it petitions to create a partial party court, not an impartial court.

18. I am concerned colleagues who are punished for doing the right thing requiring the courts uphold not violate the Constitutional rule of law. I do not want attorneys to face a partial unfair government incited obstacle to their access to the courts and fair proceedings when the courts may rule the disciplinary rules must be amended to safeguard their interests.

19. If the Courts do not amend the rules, maybe the Courts may consider exempting or staying reciprocity until appeals are concluded or the time to appeal the original order is concluded so as not to deprive others of their First Amendment right to petition the US Supreme Court fairly as I was denied vitiating rights.

20. There is little harm in staying cases, despite the fact all courts ganged up on me and denied stays in every case against me, the Delaware Supreme Court's state case, PA Case, Third Circuit reciprocating case, this Delaware Civil rights case before both the district and appellate court, the Eastern District of PA case before the District and Appellate Court, and the PA Supreme Court reciprocating case.

21. It shocked the conscience given my special circumstances.

22. If we do not have lawyers like me or colleagues who require all three branches of government uphold and not violate the Constitution than our Constitutional liberties are left unprotected.

23. We need lawyers or parties like me and others to place a Constitutional check upon the Judicial branch within the purview of the Constitution of cases and controversies.

24. Our Constitution not only creates checks and balances among the three branches but allows the people to place a check on each of the government's branches. While the vote allows the individual limited power to place on the executive and legislative branch, the First Amendment right to petition in cases or controversies or to appeal court decisions a party or attorney disagrees with similarly places checks on the judicial branch.

25. These checks must be safeguarded to protect our democratic-republic from dissolution.

26. "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)

27. Attorneys must be permitted to petition the courts to safeguard the Constitutional rule of law by breach of even the judiciary within the purview of the Constitution of 1. Cases and controversies such as mine or 2. Impeachment without retaliation for upholding the rule of law.

28. I hope this Court stays other attorneys reciprocating cases in light of the hardships I have outlined.

29. What is bullying and ugly is that I read Courts saying this or that attorney faces multiple disciplinary proceedings in their opinions to color a lawyer a troublemaker when the rules automatically places them at a disadvantage to the government through no fault of their own. The Courts disciplinary rules disparately favors the government while sacrificing lawyers

who defend and protect the people's claims and liberties thereby harming the public under the guise of protecting the public. It is deception that most people do not have time to consider the injustice by blind deferment. It is unfair.

30. Please allow other lawyers to file for cause motions 30 days after appeal to the US Supreme Court or the time for appeal has concluded to safeguard their First Amendment right to petition, access to the US Supreme Court, licenses and other claims.

31. On an aside, for this Court's disciplinary matter, I believe you did stay the matter. Albeit there are special conflict of interest considerations since Judge Colm F Connelly is the judge in this matter and it does not appear to be submitted to another judge or panel at this time per the attached exhibit I incorporate herein.

32. Thank you. I am sorry I forgot you did the right thing when others just did business as usual in that situation. That means a lot to me and gives me hope in the courts.

Thank you for your time and consideration.

Respectfully submitted,

Dated 8/24/23

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