# EXHIBIT A

EFiled: Sep 22 2020 11:48AM EDT Transaction ID 65952290 Case No. 2020-0809-TE OF DELAWARE

## IN THE CHANCERY COURT OF THE STATE OF DELAWARE

Meghan Kelly,	) Civil Action No.:
Plaintiff v. Donald Trump, a.k.a. Donald J.	
Trump, a.k.a. President Trump a.k.a. President Donald Trump, in his individual capacity, and in his	SEP 21 2020 Alice
official capacity as President of the United States Defendant.	Complaint
MEGHAN KELLY	

DONALD TRUMP, A.K.A. DONALD J. TRUMP, A.K.A. PRESIDENT TRUMP, IN HIS INDIVIDUAL CAPACITY,
AND IN HIS CAPACITY AS PRESIDENT OF THE UNITED STATES

V.

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

#### THE PARTIES

- 1. Meghan Kelly (also referred herein as, "Meghan," "Plaintiff," "I,") is an adult resident of the state of Delaware, residing at 34012 Shawnee Drive, Dagsboro, DE 19939.
- 2. Donald Trump, a.k.a. Donald J. Trump, a.k.a. President Trump, a.k.a. President Trump, in his individual capacity and in his capacity as President

of the United States, (also referred herein as, "Trump," "Defendant," "President" or "President Trump") is an adult residing at the White House located at 1600 Pennsylvania Avenue NW, Washington, DC 20500.

#### **JURISDICTION**

- 3. This Honorable Court has jurisdiction over Plaintiff's claims pursuant to 10 Del. C. Section 341.
- 4. This Honorable Court has personal jurisdiction over President Trump pursuant to 10 Del. C. Section 3104 (c)(1). Trump "(t)ransacts ... business or performs ... character of work or service in the State."
- 5. Trump allegedly transacts businesses by forming entities in this state, by paying the state fees to maintain such entities, and by, or through, transacting businesses or services through such entities, including but not limited to, the business of seeking to form entities and seek the protection of Delaware laws for financial and or limited liability advantages for business gain.
  - 6. According to an article in the Hill, "Donald Trump revealed ... that he has nearly 400 business entities registered in the state of Delaware, a state that has received renewed scrutiny in the wake of the Panama Papers leak as a domestic tax haven."
    - "During a campaign rally in Harrington, Delaware, the GOP presidential front-runner said he asked his staff to tell him how many businesses he has registered in the state."

Trump responded, 'We have 378 entities registered in the state of Delaware, meaning I pay you a lot of money folks. I don't feel at all guilty, OK?'

"He added that the figure 'might be off by a couple' since his aides come up with it on short notice." 'But you now what it is? It's a lot.' Citing, The Hill, *Trump has 378 businesses registered in Delaware*, By Harper Neidig - 04/22/16 04:55 PM EDT, https://thehill.com/blogs/ballot-box/presidential-races/277326-trump-has-378-businesses-registered-in-delaware, citing, https://t.co/M16fuma0le— ABC News Politic s (@ABCPolitics) April 22, 2016.

- 7. In the alternative of, or in addition, this Honorable Court has personal jurisdiction pursuant to 10 Del. C. Section 3104 (c)(2), since Trump "Contracts to supply services or things in this State."
- 8. In the alternative of, or in addition, this Honorable Court has personal jurisdiction pursuant to 10 Del. C. Section 3104 (c)(4), since Trump caused "tortuous injury in the State (to the person of Meghan Kelly) or outside of the State by an act or omission outside the State (because Trump) regularly does or solicits business, engages in any other persistent course of conduct in the State or derives substantial revenue from services, or things used or consumed in the State.
- 9. Trump alleges he "brings a lot of money" to the state of Delaware through the alleged hundreds of entities he formed in Delaware. Id.
- 10. In addition, Trump is campaigning in Delaware, performing the business of wooing voters to get elected to the job position of the President of the

United States for not only his pecuniary gain, or trading of favors by barter or exchange, but for the business of governing.

- 11. Thus, Trump has significant business ties in Delaware, and acceptance of donations from businesses, or people who reside in Delaware, including but not limited to alleged representatives of Mountaire.
- 12. Members of the media reported individuals with ties to Mountaire, a chicken plant based in Sussex County, DE, was at one time, President Trump's fifth largest donor in 2016. (Citing, Delmarva Now, The Delaware News Journal, Group accuses Mountaire, a top Trump donor, of poisoning rural Delaware, By Jessica Bies, June 20, 2019, https://www.delmarvanow.com/story/news/local/delaware/2019/06/20/group-accuses-mountaire-top-trump-donor-poisoning-rural-delaware/1508519001/)
- 13. Campaigning, volunteering, fundraising, asking and giving or accepting donations is business, not true charity.
  - 14. Trump seeks donations and volunteers in Delaware.
  - 15. Trump, through his campaign, is campaigning in Delaware.
- 16. Trump may even pay people to run his campaign, the business of running for elections, by barter or exchange in currency, tempting him to serve

those who serve him, thereby serving himself, at the cost of choosing not to care for the people, those he is currently charged to care for, even at times exploiting the people he is charged to serve.

17. Trump has sufficient minimum contacts to the state of Delaware to satisfy Constitutional muster.

### **FACTS**

- I. BACKGROUND FACTS, SUBSTANTIALLY BURDENING
  RELIGION BY ETERNAL HARM, LOSS OF ETERNAL LIFE OF
  LOVED ONES DECEIVED BY THE DEFENDANT
- 18. Plaintiff, Meghan Kelly, repeats and incorporates by reference all of the above paragraphs and all of the below paragraphs, and the Exhibits and citations, the paragraphs refer to herein as admissible under nonhearsay and hearsay exceptions, including but not necessarily limited to, probative fact, state of mind, belief, present sense impression, periodical exception, excited utterance, admission by party opponent, as though set forth herein in the first instance.
- 19. This case arises upon President Trump's use of religion for his own vanity, meaning using religion in vain, for his own purpose, religious or otherwise, in violation of not only the Establishment and Free Exercise clauses of the first amendment of the US Constitution applicable to Defendant pursuant to the 5<sup>th</sup>

Amendment, and 42 USCS § 2000bb- § 2000bb 4, but also in violation of the religion his actions purport to support thereby, I believe, misleading people I love to hell, and substantially burdening my free exercise of religion, while performing the government function of presiding over the United States of America, as the President of the United States.

- 20. The Defendant committed the alleged conduct mentioned herein while wearing the cloak of government authority and, or bearing the sword that his word, or perceived desire, is a command, and, or, creating the illusion that Defendant supports Christianity, or supports God or God supports Defendant, Defendant's sins, or his policies.
- 21. The President's words and conduct supporting religion, as discussed below, were accepted as truth by many, thereby, instilling the belief, supporting the President's perceived thinking or conduct or his candidacy, despite all of his sinful misbehavior and in a way supporting his sins, as excusable without confession or without repentance, is supporting God, when I believe sinfully doing your own will leads to damnation. (Mark 8:34, ""Whoever desires to come after Me, let him deny himself (meaning not doing their own will, their own selfish, sinful desires, but exercise self-discipline, using their mind, their brain, which is their free will to do God's will, love), and take up his cross, and follow Me (by love in truth, not

lusts in deception)."'); Also see, (Matthew 16:24, Luke 9:23 regarding the same message of personal sacrifice to follow Jesus).

- 22. In addition, I believe Trump misleads people I love to hell by creating the illusion his government authority is backed by God, or he supports the God I serve, by conduct discussed herein, thereby causing some people to think my God is not perfect or holy or even real. Since Defendant sins against God and man. Defendant is not perfect. Thus, Defendant is turning potential believers away from salvation from the second death. (See, Leviticus 20:26, God says "be holy because I am holy"); (Also see Matthew 5:48, Jesus commands, "Be perfect as your heavenly father is perfect," with regards to unconditionally loving people outside of your own, even your enemy.)
- 23. Americans should worship or not according to the dictates of their conscience without the inherent threat of persecution created by Defendant's support or suppression of religion.
- 24. But for Defendant's conduct there would not be an additional two prong substantial burden and injury to my free exercise of religion causing: 1. Eternal harm, and 2. Chilling of my free exercise of religion by Defendant's increased threat of government sponsored religious persecution and, or the actual

government sponsored government persecution for my attempts to freely exercise my religion, the later discussed in more detail further below.

- 25. Trump causes eternal harm to me.
- 26. Trump misleads and deceives many to sin, tempting them to reflect the image of Satan by living for self, by doing their own will, without unconditional love.
- 27. I believe people will be damned to hell but for Defendant's actions and inactions. I believe Defendant will damn people to hell by his misleadership, beyond our lifetimes, by touching humanity with the darkness and ignorance that damns, the sin against the Holy Spirit, unless this Honorable Court stops him through correction, maintaining separation of church and state.
- 28. An eternal injury suffered by me, is Defendant adversely affects my relationship with God since I believe we, God and I, will not be able to share a fuller type of love with the people the Defendant misleads to hell.
- 29. Since I love all people, I am harmed by the Defendant's conduct because I believe they will cease to exist. (See Jude 1:12, regarding people as "twice dead"); (See, Revelation 2:11, 20:6, 20:14 and 21:8, regarding the "second death," the final death); (See, Deuteronomy 30:19, 2 Kings 18:32, God says choose

life not death, meaning eternal life or permanent death at the resurrection of judgment. We have a choice.)

- 30. Thus, I believe I will sadly be prevented from loving them more fully for eternity. Accordingly, Defendant's words, and deeds supporting and suppressing religion by turning people away from salvation via my religion, harms me personally, by substantially burdening my ability to eternally love those Defendant misleads to hell, which is devastating to me.
- 31. Even if people are "remembered no more," I am still at a loss. I cannot love them, if they are destroyed, perishing in the second death. I believe I will miss out for eternity, even if I may not know it. (Citing, Ezekiel 21:32, ""You will be fuel for the fire, your blood will be shed in your land, you will be remembered no more; for I the LORD have spoken."); (Citing, Zechariah 13:2, "On that day, I will banish the names of the idols from the land, and they will be remembered no more," declares the LORD Almighty. "I will remove both the prophets and the spirit of impurity from the land."); (Citing, Job 24:20, "The womb forgets them, the worm feasts on them; the wicked are no longer remembered but are broken like a tree.")
- 32. God loves them. I believe God created every person because he loves them and for eternal life. (See, Wisdom 2:23-24 further provides "For God formed

man to be imperishable; the image of his own nature he made him. But by the envy of the devil, death entered the world, and they who are in his possession experience it."); (Also see, Wisdom 1:13, "God did not make death, nor does he rejoice in the destruction of the living..."); (Job 36:5, "God is mighty, but despises no one; he is mighty, and firm in his purpose."); (1 John 4:19, "We love because he first loved us.")

- 33. I am also injured because I recognize God's loss, and my heart aches for my Lord, especially since thousands are dying of Covid19, potentially under the deceit of the Defendant, to be doomed to hell.
- 34. With Defendant's acceptance of the cloak of government authority, his rights became more limited under the first amendment, so as not to chill the freedoms of those he serves by publicly supporting one religion over others, even injuring me indirectly by injuring those I love, while suppressing, persecuting and or ignoring the freedom of other religious beliefs or non-beliefs. (See, The Hill, Trump: Jews who vote Democrat show 'lack of knowledge or great disloyalty', by Brett Samuels, 08/20/19 03:38 PM,

https://thehill.com/homenews/administration/458135-trump-jews-that-vote-democrat-show-lack-of-knowledge-or-great, Trump said "Jews who vote Democrat show 'lack of knowledge or great disloyalty, thereby suppressing Jewish people's faith by persecution I words.); (Also see, Trump calls for discrimination against

Muslims, By Jane C. Timm, 12/07/15 05:30 PM—UPDATED 12/07/15 09:08 PM http://www.msnbc.com/msnbc/trump-calls-discrimination-against-muslims. These two articles may be submitted as evidence to show Defendant made my God look bad and turned folks who believe in other religions, or no religions off from Christianity because they reasonably and foreseeably may wrongly think my religion is naughty and mean. Since Defendant creates the illusion, he is Christian.)

- 35. This case is a case of first impression, with little judicial case law to be our guiding light. Therefore, I respectfully ask this Honorable Court to be our light.
- 36. The lineage of holiday display cases and possibly school teaching cases may be the closest applicable cases this Honorable Court may consider as it guides the nation on upholding the Constitutional freedoms of the people from government persecution, and specifically the freedom to worship or not, according to the dictates of each person's conscience, not the dictates of the President, or government agents, under the inherent threat of harm or persecution, should a person disagree with the government supported religious belief.
- 37. The United States Constitution protects the rights of the people to worship or not according to the dictates of their conscience, not the dictates of the government.

- 38. Trump is the President of the United States.
- 39. Trump accepted the cloak of government power and became bound to the reduced freedoms the Constitution grants to him in the form of limits upon his free exercise of religion, as President of the United States, when he was sworn in as President, in order not to diminish the Constitutional freedoms of those he serves, the people residing in America, regardless of gender, race, religions, age and place of origin.
- 40. Trump abused and misused his authority as President and violated his oath of office, by creating the appearance of government backing one religion over other religions.
- 41. In exchange for the cloak of government power, government servants, employees and agents, including President Trump, have reduced freedoms in order not to chill the Constitutional freedoms of those he, and other government agents, serve.
- 42. In exchange for the cloak of government power, government servants, employees and agents, including President Trump, are bound by oath to uphold the Constitution, including the Constitutional freedoms of those with different beliefs and views.

- 43. The Constitution is not a license for government agents, such as Trump to persecute people, either socially, economically or violently, nor is it a license for government agents to encourage others to persecute people based on religious beliefs or perceived religious beliefs which differ from government actors, or agents such as Defendant, President Trump.
- II. ADDITIONAL LEGAL FACTS ON PLAINTIFF'S RELIGION AND FACTS ON DEFENDANT REFLECTING THE IMAGE OF SATAN BY PLACING SELF FIRST, AND TEACHING OTHERS TO DO THE SAME BY HIS EXAMPLE, MISLEADING THEM TO HELL UNDER THE GUISE OF GODLINESS
- 44. My personal religious beliefs are in issue. So, I am providing additional facts concerning my religion, and my beliefs.
  - 45. I am a Christian.
  - 46. I believe in God, the Father.
  - 47. I believe in God the son, Jesus Christ.
  - 48. I believe in God the Holy Spirit.
- 49. I believe that God loves me and all of humanity so much that he reveals himself in three different ways, the Father, the son, Jesus, and the Holy

Spirit, to shed light, to guide us to eternal life, regardless of whether we reject his love, in the form of his guidance to save us from the final death.

- 50. I believe we all are empowered to choose to accept or reject God, to accept God in our hearts, or harden our hearts to God's love and salvation from the final death through God's teaching us the way of love leading to eternal life.
  - 51. I find guidance in Jesus, the Word made flesh.
  - 52. I find guidance in the Holy Spirit.
  - 53. I find guidance in God, the father.
  - 54. I find guidance in the Bible.
- 55. 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.
- 56. In fact, I believe the root of corruption in both business and government is serving those who serve you, thereby serving yourself, instead of the people you are supposed to serve. (Also see, Matthew 20:26 and Mark 10:43, Jesus says, "whoever wants to become great among you must be your servant"); (Also see, Luke 22:26, Jesus teaches, "But you shall not be like them. ... (T)he one who leads like the one who serves.")

I believe living for self, and your own family, your own community 57. and for those who affect, serve and benefit you, thereby living for self, without regard to others reflects the image of Satan. (Please see, Isaiah 14:13-14, Satan wanted to live for himself. He wanted to be his own God, to be as high as God. Satan did not want to lay down his life for God, by in part, loving others as himself, even outsiders, even the least of these.); (See Genesis 3:1-6, Satan tempted Eve to be like her own God too, allegedly "knowing good from evil," to reflect the image of Satan, instead of placing God first by obeying God. God loves her and desired to prevent harm towards her. The command was for her benefit, like the commands are for our benefit to teach us the way through love to escape death. She died.); (Please see, 2 Corinthians 4:4, and the Book of Job. Satan the lower case "god of this world" has authority to confuse humanity, through people, desperate conditions and the worldly desires, to teach people evil is good and good is evil. So, folks will be damned to hell for their misunderstanding.); (See Matthew Chapter 13, Only those who understood were not burnt up to be destroyed. Misunderstanding may eternally kill you.); (Also see, Matthew 4:1-11, Satan tempted Jesus to live for self too. Jesus did not give into the temptation but lived to serve, God and humanity by being the light of the way to eternal life); (Also see, Ezekiel 16;49, People were damned to hell for their unconcern "they did not help the poor and needy."); (Also see Matthew 13:18-19 "the worries of this life, the

deceitfulness of wealth and the desires for other things come and choke the word, making it unfruitful," meaning those people will be burnt up in hell.); (Further see, Luke 17:26-34 where Jesus also gave us examples of people merely caring for their own family and their own needs, working, buying and selling, eating and drinking, marrying and given into marriage before they were destroyed to be damned to hell for giving into tempting distractions of making money and making merry, and, or the anxieties of life while failing to understand the true purpose of life and eternal life, loving God and loving others as yourself, not exploiting others, outsiders to serve your greed); (Also see, Matthew 7:21 "Only those who do the will of God, go to heaven.); (Also see, Matthew 16:24, Luke 9:23, Matthew 10:38, and Mark 8:34, regarding true followers must stop doing what they desire to do, and do what God desires instead. Loving others even if it is painful.)

- 58. We are called to love those beyond our own even our opponents. (See, Matthew 5:43-78, Luke 6:27-36, and Romans 12:14-2, regarding loving your enemies. Also see, Exodus 22:21, and Deuteronomy 10:19.)
- 59. 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.

- 60. 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...")
- 61. I believe Defendant places himself first, reflecting the image of the evil one.
- Appointing family members to official government positions is a sin 62. against God and man by creating the appearance of favoritism and also by actual favoritism. (See, James 2:1, "do not show favoritism."); (James 2:9, "But if you show favoritism, you sin and are convicted by the law as transgressors."); (Deuteronomy 16:19, "Do not deny justice or show partiality. Do not accept any bribes, for a bribe blinds the eyes of the wise and twists the words of the righteous."); (Proverbs 18:5, "Showing partiality to the wicked is not good, nor is depriving the innocent of justice."); (Proverbs 24:23, "These also are sayings of the wise: To show partiality in judgment is not good."); (Malachi 2:9, "So I in turn have made you despised and humiliated before all the people, because you have not kept My ways, but have shown partiality in matters of the law."); (Job 34:19, "who shows no partiality to princes and does not favor the rich over the poor, for they are all the work of his hands?"); (Job 13:10, "Surely He would rebuke you if you secretly showed partiality.").

- 63. Defendant appointed his daughter, Ivanka Trump, and son in law, Jared Kushner, for government positions with the White House, creating the appearance of serving family first which I believe misleads people to hell by believing Trump's evil example is good or Godly. (See, The Hill, Ivanka Trump will have an official White House position, By Olivia Beavers, 03/29/17 04:57 PM EDT, https://thehill.com/homenews/administration/326400-ivanka-trump-will-have-an-official-white-house-position, relating to appointing Ivanka to a government position, and noting the appointment of Jared Kushner, the Defendant's son in law.).
- 64. I believe we are commanded to love others as ourselves, not love our own families more than others, by exploiting our position at the expense of those we are charged in order to serve, to instead serve our own family in positions of global influence where there is the possibility of trading of favors, at Americans' expense.
- 65. I believe Defendant sins against God and man by his partiality towards his own family or those who serve his interests, at the expense of those he is charged to serve, thereby misleading others to hell by teaching them to love others less than they love their own.

- 66. Jesus said even those without God love those who love them; and greet those who greet 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?")
- 67. 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.)
- 68. I believe leaders who serve themselves and those who serve them are not good leaders. They are misleaders and deceivers, not public servants. They mislead and deceive those they purport to serve, to instead exploit them, to serve themselves, by placing self first. I believe Servants of Self are Servants of Satan.

They not only harm those they are charged to care for in this life, they also mislead and deceive others to become Servants of Self, Servants of Satan too, thereby leading many to hell too.

- 69. I believe Defendant serves himself foremost, and those who serve him at the expense of those he is charged to serve.
- 70. I believe Christians are commanded to place God first by loving God and living for God foremost, and subordinately, Christians are commanded to love others as ourselves, not less than ourselves, not loving ourselves more than others.
  - 71. I believe we live or die for God. Citing, Romans 14:8.
- 72. I believe those who live and die for self or for mere people instead of God do not go to heaven.
- 73. I believe Jesus was not kidding when he said "you who love mother and father more than me are not worthy of me." "You who love son and daughter more than me are not worthy of me are not worthy of me." (Citing, Matthew 10:37).
- 74. I believe Jesus was not kidding when he said unless your "righteousness exceeds that of the scribes you will" not go to heaven. (Matthew 5:20.)

- 75. I believe our righteousness exceeds that of the scribes by our trust in God through his Word, accessible through the Father, son and Holy Spirit.
- 76. I believe the Bible teaches Abraham believed what God said. His belief was attributed to righteousness. (Citing, Genesis 15:6.)
- 77. Abraham listened to God to the point he was willing to sacrifice his own son. (Citing, Hebrews 11:17).
- 78. I believe this righteousness was attributed to Lot when he listened to God's word through messengers, the angels. He did not even turn around when his wife turned into a pile of salt. (See, Genesis 19:26).
- 79. In the Parable of the ten virgins in Matthew 25: 1-13 Jesus tells a story of ten virgins traveling to a marriage feast. All ten virgins had lamp oil. Five ran out, and asked those who had oil to give them some. Those with oil responded rightly by telling those without, no, go buy your own or we will not have enough ourselves. They did not even say sorry. Those who bought the lamp oil did not get back in time and were locked out of the marriage feast, meaning they went to hell.
- 80. I believe Jesus teaches us by this parable that: yes, we love others, and yes, we love ourselves, but we love God more, and live for God foremost, not for self or others. Id.

- 81. Trump's campaign includes the Slogan "America First."
- 77. Trump says "as the President of the United states I will always put America First." (Citing, The Hill Trump: I will always put America first, By Max Greenwood, 09/19/17 10:33,

https://thehill.com/homenews/administration/351320-trump-i-will-always-put-america-first).

- 82. I believe Trump's America first policy, teaches people to learn to place themselves first, like the devil in Isaiah Chapter 14, thereby teaching them to be children of the devil, instead of children of God, damning them to hell for evil thinking or evil doing.
- 83. I believe Trump teaches folks not to place God first, under the guise of Godliness, by failing to teach those he serves to care about others, regardless of race, religion or place of origin, as they care for themselves.
- 84. I believe President Trump's focus on putting self first, by teaching Americans to put America first, misleads and deceives people to reflect the image of Satan, by learning to love money and merriment, profit and pleasure more than other people.

- 85. Instead of loving one another, people wrongly learn to love money to the extent that they are willing to harm and destroy human life, and eternal life to serve their fleeting fancies for funding and temporary desires.
- 86. I believe President Trump's winning at all costs, even at the cost of cheating, violating greater laws, of justice, mercy and faithfulness (See Matthew, 23:23), makes us all lose, modeling the reflection of the image of Satan called the "lawless one" by his disregard of laws that teach us to care about other people. (Citing, 2 Thessalonians 2:8, also see Psalm 101:3); (I define evil as absence of love because "God is love." Citing, 1 John 4:16, People without God in their hearts have an emptiness they attempt to fill with fleeting fancies, fleeting feelings, fleeting funding or other idols in place of God's love.); (See Exhibit 8, including articles of impeachment I proposed to impeach Trump for violating certain laws. These are evidence of my belief in Defendant's lawlessness.)
- 87. I believe President Trump teaches the image of Satan, the "lawless one," as good, by teaching everyone for themselves, lawlessness, under the facade of greatness or business, but in truth greed, without love or concern for outsiders or those beyond their own, misleading those he serves to harm and hell. (Citing, 2 Thessalonians 2:8-9).

- 88. It makes me sad because I believe Defendant President Trump violates the First Amendment and God's laws by using God's name for his own vanity, meaning his own purpose in place of God's purpose, to serve power and profit under the guise of God thereby misleading people to harm and hell.
- 89. Sadly, I believe people go to hell for their confusion. Satan, the lower case" god of this world," confuses to kill eternally. (Citing, 2 Corinthians 4:4); (Also see 2 Corinthians, Chapter 4 to confirm by reading the entire chapter.)
- 90. I believe 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.
- 91. In Ezekiel Chapter 34:1-10, God scolds leaders, called shepherds, who take advantage of the sheep, meaning the people they are charged to care for, to serve themselves instead of caring for them. "Woe to you shepherd of Israel who only take care of yourselves! Should not shepherds take care of the flock? You eat the curds, clothe yourself with wool and slaughter the choice animals, but you do not take care of the flock...." Id. (Also see, Jeremiah 23:1, and Zechariah 11:17); (Also see, Jeremiah 50:6, "My people have been lost sheep; their shepherds have led them astray and caused them to roam on the mountains. They wandered over mountain and hill and forgot their own resting place."); (Isaiah 53:6, "All we like

sheep have gone astray; we have turned everyone to his own way; and the LORD hath laid on him the iniquity of us all."); (Jeremiah 23:11, 'Both prophet and priest are godless; even in my temple I find their wickedness,' declares the LORD."); (Jeremiah 5:31, "The prophets prophesy falsely, and the priests bear rule by their means; and my people love to have it so: and what will ye do in the end thereof?"); (Jeremiah 6:13, "For from the least of them to the greatest, all are greedy for gain. From prophet to priest, all practice deceit."'); (Jeremiah 23:11-15, "For both prophet and priest are profane; yea, in my house have I found their wickedness, saith the LORD..."); ("Isaiah 56:10-12, "His watchmen are blind: they are all ignorant, they are all dumb dogs, they cannot bark; sleeping, lying down, loving to slumber..."); ( See, Isaiah 3: ... "your leaders mislead you; they send you down the wrong road"); (See, Isaiah 9:16, "For the leaders of this people cause them to err; and they that are led by them are destroyed.")

- 92. I believe President Trump sins against God and man by harming others to serve self.
- 93. President Trump's ignorance is not innocence. I believe people go to hell for their ignorance, encouraging hardness of heart, absence of love which is absence of God. Since, I believe God is love. (See, Ephesians 4:18, "They are darkened in their understanding and separated from the life of God because of the ignorance that is in them due to the hardening of their hearts."); (See, Hosea 4:6,

"my people are destroyed (in hell) from lack of knowledge. "Because you have rejected knowledge, I also reject you as my priests; because you have ignored the law of your God, I also will ignore your children.").

- 94. I believe President Trump chooses not to use his free will, which is his brain, his mind, to choose to think, to care, to love others as himself.
- 95. I believe President Trump loves others outside of his own less than he loves himself. (See, On Russian bounties, what did Trump know and when did he know it?, MSNBC, By Steve Benen, June 30, 2020, 8:00 AM EDT https://www.msnbc.com/rachel-maddow-show/russian-bounties-what-did-trump-know-when-did-he-know-n1232506, Defendant President appeared to be willing to sell the souls of troops to serve himself, or the in the alternative, it appeared the Defendant did not care enough about the American troops with bounties on their heads to speak up on their behalf.)
- 96. The Holy Spirit, via God, via my conscience, teaching me to care, to love, is leading me to do the same as the prophets, to correct the President, in hopes to heal not only the victims of the harm he causes in this life and to prevent eternal harm in the next, but to heal his ugly heart with God's truth in love, not deception. God loves other people too, even your enemy, people of other political

affiliations, races, religions, and places of origin, even if they do not know God, even if they have not accepted God's love.

- III. FACTS, THE HOLY SPIRIT, DISCERNING A GLIMPSE OF GOD
  AND MAN'S HEARTS, JUDGING CORRECTLY THROUGH THE
  HOLY SPIRIT, AND ADDITIONAL LEGAL FACTS ON
  CAUSATION AND FAITH
  - 97. My religious beliefs are genuine.
- 98. The Holy Spirit led me to file complaints against Justice Kavanaugh to uphold the integrity of the courts from the appearance of impropriety. (See, Exhibit 1, letters confirming Meghan Kelly filed ODC complaints); (Amos 5:15, "Hate evil, love good; maintain justice in the courts. Perhaps the LORD God Almighty will have mercy on the remnant of Joseph."); (Amos 5:12, "There are those who oppress the innocent and take bribes and deprive the poor of justice in the courts."); (Zechariah 8:16, "Speak the truth to each other, and render true and sound judgment in your courts").
- 99. After all, I believe, "justice, mercy and faithfulness" are more important commands than laws relating to mere money per Jesus Christ. (Citing, Matthew 23:23).

- 100. I believe justice is done by correcting leaders like Defendant who mislead some of those they serve to harm and hell. (See, Matthew 23:15, Jesus scolded leaders telling them they were making their converts "twice as much a child of hell as (they) are.")
- 101. The Holy spirit led me to file a lawsuit against the Democrats in the state of Delaware in order not to compromise my belief in Jesus's teachings to run for office. (See, Exhibit 2, Court stamped Complaint relating to Chancery Court Case Number 2020-0517).
- 102. My faith in the Holy Spirit is genuine. I confronted the Delaware Supreme Court when they violated my religious rights to affirm instead of swear into the Delaware Bar. (See Exhibit 3).
- 103. I twice rejected appointments to family law matters as violating my religious beliefs (See Exhibit 4).
- 104. I confronted the Courts in Delaware per the attached letter concerning impartiality and bias. (See Exhibit 5); (Also see, Leviticus 19:15 "You must not pervert justice; you must not show partiality to the poor or favoritism to the rich; you are to judge your neighbor fairly"); (see, Exodus 23:6, "You shall not deny justice to the poor in their lawsuits."); (see, Deuteronomy 16:19, "Do not deny justice or show partiality"); (also see, Deuteronomy 1:17, "Show no partiality in

judging; hear both small and great alike. Do not be intimidated by anyone, for judgment belongs to God. And bring to me any case too difficult for you, and I will hear it.").

- 105. 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 6). I believe it means using the name of God, or religion or scripture for man's purpose instead of a true religious purpose.
- 106. The Holy Spirit is revealed to me because I am born again per Jesus Christ's teachings in John Chapter 3. Per John 3:3-8, Jesus said;

"Very truly I tell you, no one can see the kingdom of God unless they are born again.' 'How can someone be born when they are old?' Nicodemus asked. 'Surely they cannot enter a second time into their mother's womb to be born!' Jesus answered, 'Very truly I tell you, no one can enter the kingdom of God unless they are born of water and the Spirit. Flesh gives birth to flesh, but the Spirit[b] gives birth to spirit. You should not be surprised at my saying, You must be born again. The wind blows wherever it pleases. You hear its sound, but you cannot tell where it comes from or where it is going. So it is with everyone born of the Spirit."

- 107. I believe Jesus.
- 108. I do not know all things, but through the Holy Spirit I gain some understanding of truth, and of God's will and design.
- 109. Through the Father, Son and the Holy Spirit, God is accessible to me, and to all of humanity should they not harden their hearts. (See, Matthew 28:1,

"Therefore go and make disciples of all nations, baptizing them in the name of the Father and of the Son and of the Holy Spirit" God reveals himself to us in three ways through, the Father, Son and Holy Spirit, because he loves us and seeks to guide us to save us from hell.).

- 110. Through the Holy Spirit we are able to know God.
- 111. I know God.
- 112. I have accepted the Holy Spirit into my heart.
- 113. The Word of God, also known as the Holy Spirit, is also revealed to us through other people, born again, including the people mentioned in the Bible, and the writers of the Bible who accepted God, the Spirit of Truth, in their hearts by laying down their will to understand and to do God's will by their love.
- 114. I believe we are able to know God better through the Holy Spirit revealed through the writers and people in the Bible by reading or listening to the Bible.
- 115. I believe they accepted the Holy Spirit in their hearts, like I did. For example, (See, Daniel 13:45 "God stirred up the Holy Spirit of a young boy named Daniel."); (See, Genesis 41:38 'So Pharaoh asked them, "Can we find anyone like this man, one in whom is the spirit of God?"'); (See, Exodus 31:3 and Exodus 35:31, "and I have filled him with the Spirit of God, with wisdom, with

understanding, with knowledge and with all kinds of skills"); (See, Numbers 11:17, "I will come down and speak with you there, and I will take some of the power of the Spirit that is on you and put it on them."); (See, Numbers, 11:25, "Then the LORD came down in the cloud and spoke with him, and he took some of the power of the Spirit that was on him and put it on the seventy elders. When the Spirit rested on them, they prophesied--but did not do so again.); (See, Deuteronomy 34:9, The Holy Spirit is also called the "spirit of Wisdom,"); (See, Judges 3:10. The Holy Spirit is also called the "spirit of the Lord" The holy spirit works the same in the Old testament too.); (Also see, Romans 8:14, "those who are led by the Spirit of God are children of God."); (Also see, Psalm 51:12, "Restore to me the joy of Your salvation And sustain me with a willing spirit."); (See, Wisdom 1:4-6, "Because into a soul that plots evil wisdom does not enter, nor does she dwell in a body under debt of sin. For the holy spirit of discipline flees deceit and withdraws from senseless counsels and is rebuked when unrighteousness occurs. For wisdom is a kindly spirit, yet she does not acquit blasphemous lips; Because God is the witness of the inmost self and the sure observer of the heart and the listener to the tongue"); (See the entire book of wisdom too. The Wisdom described in this book is another name for the Holy Spirit); (See, Matthew 1:18, "This is how the birth of Jesus the Messiah came about: His mother Mary was pledged to be married to Joseph, but before they came together, she was found to be pregnant through the Holy Spirit."); (See, James 1:5 "If any of you lacks wisdom, you should ask God, who gives generously to all without finding fault, and it will be given to you." Wisdom meaning the Holy Spirit, the Word that guides our steps with a light on the narrow way.); (Also see, Luke 11:13 "If you then, being evil, know how to give good gifts to your children, how much more will your heavenly Father give the Holy Spirit to those who ask Him?" If we ask God to be the Lord of our life, if we ask God into our hearts and lay down our will, our desires, for God's will, which is eternal life through love, truth, justice, mercy and faithfulness, he will not reject us.); (See, Matthew 12:32 "And whoever speaks a Word against the Son of Man will be forgiven; but whoever speaks against the holy Spirit will not be forgiven, either in this age or in the age to come."); (See, Mark 13:11, "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."); (Mark 12:36, "David himself, speaking by the Holy Spirit, declared: "The LORD said to my LORD: "Sit at my right hand until I put your enemies under your feet.""); (See also, Mark 3:29, "but whoever blasphemes against the Holy Spirit will never be forgiven; they are guilty of an eternal sin." This means hardening your heart to loving God and others as yourself, even those who inconvenience others you. I believe this means not accepting God in your heart and not reflecting love, God's image.); (Matthew

3:11, John the Baptist said, "I baptize you with[a] water for repentance. But after me comes one who is more powerful than I, whose sandals I am not worthy to carry. He will baptize you with[b] the Holy Spirit and fire."); ( John 14:26, "But 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 said to you."); (John 16:13, "But when he, the Spirit of truth, comes, he will guide you into all the truth. He will not speak on his own; he will speak only what he hears, and he will tell you what is yet to come."); (John 14:17, "the Spirit of truth. The world cannot accept him, because it neither sees him nor knows him. But you know him, for he lives with you and will be in you."); (Ephesians 1:13, "And you also were included in Christ when you heard the message of truth, the gospel of your salvation. When you believed, you were marked in him with a seal, the promised Holy Spirit." This seal can be broken should we sin against the Holy Spirit without repentance and reconciliation with God by love. It is possible to choose to turn away from God like King Solomon who wrote two books in the Bible did. I hope he repented, but do not know.); (See, 2 Peter 2:21 "It would have been better for them not to have known the way of righteousness, than to have known it and then to turn their backs on the sacred command that was passed on to them." We most definitely can lose the way to salvation. Just because God knows everything at once does not eliminate our freedom of choice.); (See, Hebrews 3:14, "We have come to share in Christ, if indeed we hold our original conviction firmly to the very end."); (See, also, Matthew 24:13, "but the one who stands firm to the end will be saved."); (1 John 4:6, "We are from God, and whoever knows God listens to us; but whoever is not from God does not listen to us. This is how we recognize the Spirit of truth and the spirit of falsehood."); (And see, John Chapter 3, Regarding being born again, being born of flesh in human life and of spirit receiving eternal life the same as Moses and Daniel did in the Old Testament.).

116. In the same way the Holy Spirit, God, is now accessible to all mankind, as explained in Jeremiah Chapter 31, with the death and resurrection of Jesus Christ, if people choose not to harden their hearts to love, to God for "God is love". (Citing, 1 John 4:8); (See, Jeremiah 31-34, "The days are coming,' declares the Lord, when I will make a new covenant with the people of Israel and with the people of Judah. It will not be like the covenant I made with their ancestors when I took them by the hand to lead them out of Egypt, because they broke my covenant, though I was a husband to them.' This is the covenant I will make with the people of Israel after that time, declares the Lord. I will put my laws in their minds and write it on their hearts. I will be their God, and they will be my people. No longer will they teach their neighbor, or say to one another, 'Know the Lord,' because they will all know me, from the least of them to the greatest,' declares the Lord. 'For I will forgive their wickedness and will remember their sins no more."); (Also see,

Romans, 9:6-8 "It is not as though God's word had failed. For not all who are descended from Israel are Israel. Nor because they are his descendants are they all Abraham's children. On the contrary, 'It is through Isaac that your offspring will be reckoned.' In other words, it is not the children by physical descent who are God's children, but it is the children of the promise who are regarded as Abraham's offspring." It is not by bloodline but I believe by faith, the same faith as those examples in Hebrews Chapter 11, the same faith Abraham manifested.); (See also, Romans 4:3, and Galatians 3:6, Abraham believed God was not kidding and that was attributed to him as righteousness.); (Also see, Romans 2:15 With regards to those without God or religion or other religions, their conscience will defend them or condemn them on judgment day.); (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.); (See,1 John 4:8. The laws taught us we are loved and to love for "God is love." We have the free will to choose to reflect the image of God by our love or the image of the devil by our absence of love, replaced by our lusts, our own will, including but not limited to our own desires, living for self, putting self or family first, or people pleasing or living for something else in place of God, in place of love, such as not desiring to rock the boat, to avoid conflict.); (See also, 1 John 4:16 "God is love"); (See, Matthew 10:34-37, Jesus Citing, Micah 7:6, with regards to rocking the boat. "Do not suppose that I have

come to bring peace to the earth. I did not come to bring peace, but a sword (of his Word, not a weapon). For I have come to turn "a man against his father, a daughter against her mother, a daughter-in-law against her mother-in-law. A man's enemies will be the members of his own household." '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. Whoever does not take up their cross and follow me is not worthy of me. Whoever finds their life will lose it, and whoever loses their life for my sake will find it.); (Also see, Micah 7:5-6 regarding placing God, the Holy Spirit first above your closest loved ones.).

- 117. Jesus proclaims: "By this everyone will know you are my disciples, if you love one another." (John 13:35.)
- 118. That love is how we choose to reflect God's image instead of the image of the evil one. (See, Genesis 1:26-27, regarding creating man in the image of God.).
  - 119. I believe sin means absence of love in our thinking or doing.
- 120. I believe even if we confuse serving the lusts or sinful desires of others as love, sin is still evil, and may damn people to hell without a cleaning of our hearts through repentance.

- 121. Jesus gave us the new Command to help us to better understand the narrow way, to elaborate on his command "love your neighbor as yourself."

  (Citing, Matthew 22:39); (See, Leviticus 19:16-18, Jesus cites an old command, but clarifies by teaching a neighbor is all of humanity, not merely fellow

  Israelites); (See, Luke 10:29- 37, I believe Jesus explains a neighbor in this parable was someone outside of their own by their love, in response to the question of who is my neighbor, meaning all people by our love.)
- 122. Jesus said I give you a new command. "Love one another," meaning every person, even your enemies, even your business competitors, even out of staters, like folks from Pennsylvania. (Citing, John 13:34).
- 123. It takes the choice to use your free will, which is your brain, your mind, to think, to seek truth, to care, to know God, to love God foremost and to love one another subordinately. (See, Matthew 22:37-40 regarding the greatest commandment, love God and the second greatest commandment love your neighbor as yourself, not less than yourself.)
  - 124. We clearly learn we have a choice in Sirach 15:11-17 which provides:

"Don't claim that he has misled you; he doesn't need the help of sinners to accomplish his purposes. The Lord hates evil in all its forms, and those who fear the Lord find nothing attractive in evil. When, in the beginning, the Lord created human beings, he left them free to do as they wished. If you want to, you can keep the Lord's commands. You can decide whether you will be loyal to him or not. He has placed fire and water before you; reach

out and take whichever you want. You have a choice between life and death; you will get whichever you choose." (Also see, Genesis 4:7 "If you do what is right, will you not be accepted? But if you do not do what is right, sin is crouching at your door; it desires to have you, but you must rule over it." I believe we all have the power to use our free will, our brains, our minds to turn away from sin no matter what businessmen sell you).

- 125. I believe, ignoring your conscience that tugs at your mind and heart, is ignoring the Holy Spirit, hardening your heart to God's will, to do your own will, misbehaving like Satan misbehaves according to Isaiah chapter 14. Jesus explained we must use all of our "mind(s)" to love God. (Citing, Jesus in Mark 12:30, Mark 12:33, Matthew 22:37, and Luke 10:27.)
- 126. We love God, in part, by seeking to understand God's heart.

  Admittedly we know only partially. (See, 1 Corinthians 13:12, "For now we see only a reflection as in a mirror; then we shall see face to face. Now I know in part; then I shall know fully even as I am fully known.")
- 127. Jesus teaches we know man's heart by his words. (See, Matthew 12:34-37, Jesus stated, "'You brood of vipers, how can you who are evil say anything good? For the mouth speaks what the heart is full of. A good man brings good things up in him, and an evil man brings evil things out of the evil stored up in him. I tell you everyone will give an account for every careless word they have spoken. For by your words you will be acquitted, and by your words you will be condemned."'); (See also, Matthew 15:18, "But the things that come out of a

person's mouth come from the heart, and these defile them."); and (Luke 6:45, "The good things out of the good treasure of his heart, and the evil man brings evil things out of the evil treasure of his heart. For out of the overflow of the heart, the mouth speaks."); (Also see, Proverbs 18:21 "Life and death are in the power of the tongue, and those who love it will eat its fruit.").

- 128. Accordingly, we know God, by God's Words accessible through the father, son and the holy spirt, including the Bible and the Word made Flesh, Jesus Christ.
- 129. I believe the Holy spirit through the Word of God, the Bible, teaches we gain a glimpse of God's heart by his Word, through the Holy Spirit within those who wrote or are written about in the Bible.
- 130. That is why King David was called a man after God's own heart because he sought to gain a glimpse of God's will, God's heart's desires, by studying his Word, revealed through his laws in the Bible. (See, Acts 13:22, "'I have found David son of Jesse, a man after my own heart; he will do everything I want him to do.'"); (See, including but not limited to, Psalm 119:20, Psalm 119:30, Psalm 119:91, Psalm 10:5, Psalm 119:43, Psalm 119:175 David talks about seeking to know and live God's laws in the Book of Psalms.).

- 131. 1 Corinthians 2:15 provides, "He who is spiritual (a person with the Holy Spirit) judges all things, but such a person is judged by no one."
- 132. Additionally, in John 7:24, Jesus says, "Stop judging by mere appearances, but instead judge correctly." I think this means through the lens of the Holy spirit, by how God teaches us to think, to examine people's hearts.
- 133. I believe Jesus is disappointed in people for merely judging physical things correctly, but not judging spiritual things. (See, Matthew 16:3 where God scolds religious leaders for misunderstanding.)
  - 134. The Holy Spirit helps us to see things how they actually are.
- 135. I believe the bible teaches many people are evil, not good, choosing to reflect the image of Satan instead of God because they are misled by men like Defendant President Trump.
- of hell should they die without the opportunity to be born again per Jesus in John chapter 3. (See, Ezekiel 9:4-6, I believe these verses teach children will be damned to the second death on judgment day too. Besides Jesus says no one can go to heaven unless they are born again in John Chapter 3. Since children are afforded fewer opportunities to be born again, they are most likely to be damned to the final death which makes me sad.)

- 137. Matthew 18:6, Jesus says, "It would be better for them to be thrown into the sea with a millstone tied around their neck than to cause one of these little ones to stumble," meaning misleading children off of the narrow path to heaven onto the broad path to hell. (Also see, Luke 17:2, and Mark 9:42. For companion citations); (Matthew 7:13-14, "Enter through the narrow gate. For wide is the gate and broad is the way that leads to destruction (meaning hell, the final death), and many enter through it. But small is the gate and narrow the way that leads to (eternal) life, and only a few find it." The way is narrow, uncompromising full of integrity, not false assurance and false comfort.)
- 138. It is a great sin to mislead and deceive people to serve sins to be damned to hell.
- 139. I am concerned about everyone's eternal lives, especially the little children as they watch Defendant Trump misbehave, or their elder's support of Defendant and so indirectly support his misbehavior under the guise of good or God. I believe, but for Defendant, little children, as well as adults, are misled to hell too.
- 140. I believe more people will go to hell because they are deceived by the Defendant, unless the veil of deception is somehow lifted by this Honorable Court. (See Matthew 27:51, I think the veil being torn at the death of Jesus symbolizing

all of humanity has access to God through the Holy Spirit for it is written on all people's hearts per Jeremiah 31, to accept or harden our hearts to); (Also see, 2 Corinthians 4:3, "And even if our gospel is veiled, it is veiled to those who are perishing.")

- 141. I believe Defendant Trump will mislead people to hell, beyond his or my lifetime, unless this Honorable Court corrects Defendant Trump.
- 142. I believe future federal government agents, such as the President, will mislead people to hell because of Defendant Trump's bad example, beyond my life time, if they are permitted to use religion for their own vanity, regardless of which religion, thereby inherently suppressing certain religions, and supporting others to support their personal purposes under the guise of religion, while acting under the cloak of government authority.
- 143. The President's public support for God is causing de facto government sponsored private religious persecution.
- 144. I believe Christians should obey the greatest command to love God by living for God and subordinately to love one another. Love does not encourage harm in this life and eternal life for mere material convenience. (See, Romans 13:10).

- 145. I believe our purpose is bigger than anyone in this world or anything in this world. We were meant to live forever, to feel a fuller type of love with God and one another. Yet, we all, individually, choose eternal life or the final death. (See, Deuteronomy 30:19, "I have set before you life and death, blessings and curses."); (Also see, Jeremiah 21:8, I am setting before you the way of life and the way of death."); (Deuteronomy 30:15, See, I set before you today life and prosperity, death and destruction.); (Psalm 56:13, For you have delivered me from death and my feet from stumbling, that I may walk before God in the light of life. God's Word saves us from hell); (Psalm 107:20, He sent out his word and healed them; he rescued them from the grave. God's Word via the Holy Spirit, and the Word made Flesh, Jesus Christ); (Psalm 119:105, "Your word is a lamp for my feet, a light on my path." We have a choice to seek the Word while it may be found, and the way to eternal life or to ignore or reject it, to our own doom.)
- 146. Sadly, I believe scripture teaches many will perish in the second death. Few find eternal life since they are misled by leaders like Defendant who lead them into temptation.
- of salvation via loving God and the new command loving one another. (See, John 13:34 "A new command I give you: Love one another. As I have loved you, so you must love one another.").

- 148. I believe showing us the way to escape death is pretty loving of God.
- 149. I believe many people confuse people pleasing as love. Many confuse lusts as love, and they perish for their misunderstanding.
- 150. I believe the Defendant is encouraging confusion and veiling the truth that can save people from their sins through deception. (See, 2 Corinthians 3:14-18, "But their minds were made dull, for to this day the same veil remains when the old covenant is read. It has not been removed, because only in Christ is it taken away. Even to this day when Moses is read, a veil covers their hearts. But whenever anyone turns to the Lord, the veil is taken away. Now the Lord is the Spirit, and where the Spirit of the Lord is, there is freedom. And we all, who with unveiled faces contemplate the Lord's glory, are being transformed into his image with ever-increasing glory, which comes from the Lord, who is the Spirit.")
- 151. Hundreds of people are dying of Covid19 every day. It is better to tell people sins will kill you. It is better for people to turn away from sins, which is absence of love, and be saved from the second death, than to encourage folks to dismiss the sins that hurt others and themselves eternally, despite gaining gold, and glory here, thereby encouraging folks to remain in sin, as Defendant models by dismissing sins by ignoring his own wrong doing and the wrong doing of those who serve Defendant's interests.

eternal lives by transforming them into right doers, and healing the victims of their misdeeds, again and again, never giving up hope they may choose to behave better by love, affording them opportunities like God affords us the same so long as they remain alive. (See, Ephesians 5:11 "Have nothing to do with the fruitless deeds of darkness, but rather expose them."); (Luke 17:3, "So watch yourselves. 'If your brother or sister sins against you, rebuke them; and if they repent, forgive them.""); (See, Matthew 18: 15-17, "If your brother or sister sins, go and point out their fault, just between the two of you. If they listen to you, you have won them over. But if they will not listen, take one or two others along, so that every matter may be established by the testimony of two or three witnesses. If they still refuse to listen, tell it to the church; and if they refuse to listen even to the church, treat them as you would a pagan or a tax collector.""); (2 Timothy 4:2, "Preach the word; be prepared in season and out of season; correct, rebuke and encourage--with great patience and careful instruction."); (Also see, Ecclesiastes 7:5, Proverbs 27:5, 1 Timothy 5:1); (See, 1 Timothy 5:20, "But those elders who are sinning you are to reprove before everyone, so that the others may take warning.")

155. Sometimes, people really do not understand evil is not good. Good is not evil. I believe the folks who accepted the Holy spirit who wrote or are written about in the Bible are still making a difference, beyond their lives, just as each of our lives make a difference concerning the eternity of others, even beyond our

lifetimes. (Cf., Isaiah 5:20, "Woe to those who call evil good and good evil, who put darkness for light and light for darkness, who put bitter for sweet and sweet for bitter.").

- 156. I believe God, the Holy Spirit revealed to us through other people and through the Bible too.
  - III. CHILDREN OF THE DEVIL v. CHILDREN OF GOD, THE MARK OF THE BEAST, THE WHORE, THE DAMNED V THE MARK OF LOVE, OF GOD
- another, for love comes from God. Everyone who loves has been born of God and knows God."); (1 John 3:9, No one who is born of God will continue to sin, because God's seed remains in them; they cannot go on sinning, because they have been born of God."); (Galatians 4:7, "So you are no longer a slave, but God's child; and since you are his child, God has made you also an heir."); (Wisdom 2:13-15, "He claims to have knowledge of God, and calls himself a child of the Lord. We see him as a reproof to our way of thinking, the very sight of him weighs our spirits down; for his kind of life is not like other people's, and his ways are quite different.")

158. Not everyone is a child of God. (John 8:47, Jesus says, "Whoever belongs to God hears what God says. The reason you do not hear is that you do not belong to God.").

## 159. 1 John 3:10-11 Provides:

"This is how we know who the children of God are and who the children of the devil are: Anyone who does not do what is right is not God's child, nor is anyone who does not *love* their brother and sister. For this is the message you heard from the beginning: We should *love* one another." (emphasis intended).

160. God teaches me people are children of the devil. (Citing, Jesus in John 8:44, "For you are the children of your father the devil, and you love to do the evil things he does. He was a murderer from the beginning. He has always hated the truth, because there is no truth in him. When he lies, it is consistent with his character; for he is a liar and the father of lies."); (Also see, 1 John 3:8, "The one who does what is sinful is of the devil, because the devil has been sinning from the beginning. The reason the Son of God appeared was to destroy the devil's work."); (Also see, Acts 13:10, "You are a child of the devil and an enemy of everything that is right! You are full of all kinds of deceit and trickery. Will you never stop perverting the right ways of the Lord?"); (Matthew 13:38, "The field is the world, and the good seed represents the sons of the kingdom. The weeds are the sons of the evil one").

- 161. Scripture teaches me there are more of the desolate one, meaning those without God, than with God. (See, Isaiah 54:1, "Sing, barren woman, you who never bore a child; burst into song, shout for joy, you who were never in labor; because more are the children of the desolate woman than of her who has a husband," says the LORD."); (Galatians 4:27, "or it is written: 'Be glad, barren woman, you who never bore a child; shout for joy and cry aloud, you who were never in labor; because more are the children of the desolate woman than of her who has a husband."")
- 162. I believe scripture teaches children of God will live with "children of the evil one." (Citing, Matthew Chapter 13.)
- 163. I am taught by God to judge, or discern children of the devil from children of God. (1 John 2:9, "If anyone claims to be in the light but hates his brother, he is still in the darkness."); (See, 1 John 2:11, "But whoever hates his brother is in the darkness and walks in the darkness. He does not know where he is going, because the darkness has blinded his eyes."); (1 John 3:15, "Everyone who hates his brother is a murderer, and you know that eternal life does not reside in a murderer.")
- 164. Jesus commands us to "judge correctly," I believe commanding us to know the "pigs" and "swine," meaning folks who profess Jesus but trample upon

Jesus, by pimping out Jesus's name to serve their profit. (Citing, John 7:24); (See, Matthew 7:6, "Do not give dogs what is sacred; do not throw your pearls to pigs. If you do, they may trample them under their feet, and turn and tear you to pieces.")

- 165. "Pigs" and "swine" behave the same as Satan did in Genesis, Chapter 3, and in Matthew, 4:1-11 and in the companion verse Luke 4:1-13, by tempting humanity to reflect the image of the devil under the guise of God, as he harms and destroys those who are misled. Id.
- 166. I believe Trump's fruits, words and deeds, bear "thorns and thistles" per scripture, encouraging others to do the same under the guise of good or God, creating more fuel "for the fires" of hell. (Citing, Matthew 7:16, "By their fruit you will recognize them. Do people pick grapes from thornbushes, or figs from thistles?"); (See, Ezekiel 21:32, Ezekiel 15:4, Isaiah 9:19, Isaiah 9:5, Habakkuk 2:13, Ezekiel 15:6, Jeremiah 51:58, relating to the fuel for the fires of hell to be burnt up on judgment day.)
  - 167. I believe leaders have the power to mislead people to hell.
- 168. But for some leaders' words and deeds, I believe many would not go to hell.
- 169. But for Defendant President Trump's words and deeds, I believe many would not be misled on the way to hell.

- 170. I believe putting words in God's mouth or distorting the meaning, or accepting, or creating the illusion of a wrong meaning to serve a purpose other than God's will, is using God's name in vain. (See, Ezekiel 13:3, "This is what the Sovereign LORD says: 'What sorrow awaits the false prophets who are following their own imaginations and have seen nothing at all!""); (Lamentations 2:14, "The visions of your prophets were empty and deceptive; they did not expose your guilt to ward off your captivity. The oracles they saw for you were empty and misleading."); (Jeremiah 23:16, "This is what the LORD of Hosts says: 'Do not listen to the words of the prophets who prophesy to you. They are filling you with false hopes. They speak visions from their own minds, not from the mouth of the LORD.""); (Jeremiah 28:15, "Then the prophet Jeremiah said to the prophet Hananiah, "Listen, Hananiah! The LORD did not send you, but you have persuaded this people to trust in a lie."')
- 171. I believe it is wrong because I learned it from God's teachings about false prophets and the wolves in sheep's or shepherds' clothing that mislead the sheep to slaughter by using God's name, or the name of good, in vain. (See, Matthew 7:15-23, 1 John 4:1, Mark 13:22, Matthew 24:24, Matthew 24:11, Luke 6:26, Ezekiel 34:2).
- 172. To confirm, I believe people have the power to mislead other people to hell.

- 173. I believe Defendant is misleading people I love to hell, under the guise of heaven, and those Defendant misleads are misleading others to hell too.
- 174. I believe Jesus noted the power of people to mislead others to hell when Jesus scolds religious leaders for making their followers twice as worthy of hell, under the guise of Godliness. (See, Matthew 23:15, "Woe to you, teachers of the law and Pharisees, you hypocrites! You travel over land and sea to win a single convert, and when you have succeeded, you make them twice as much a child of hell as you are.").
  - 175. Children of God, know God.
- 176. I know God more by seeking to understand his Word, through the father son and holy spirit, and the holy spirit revealed to us through the Bible too.
  - 177. Children of the devil have the power to mislead others to hell.
  - 178. I believe Trump is a child of the devil.
- 179. I believe people are made in the image of God by their ability to love unconditionally since we are taught God is love.
  - 180. 1 John 4:16 provides in part "God is love."
  - 181. I believe God is love.

- 182. I believe we become saved by being born of God by accepting God, the Holy Spirit, in our hearts, which is love in our hearts to help us realize our strength and power to fearlessly choose to reflect the image of God by loving God foremost and loving others as ourselves.
- 183. The Devil, and children of the devil, like I believe Donald Trump is, mislead the masses to hell under the guise of heaven, or self gain, by driving out God in their hearts, unconditional love in the hearts of man, replaced with lust and business greed, by barter or exchange.
  - 184. Love is unconditional, not giving to get.
  - 185. Business is conditional, giving to get, not unconditional love.
- 186. I believe toiling in the soil, business, is one of the punishments for original sin meant to teach humility, not to be glorified teaching the sin of Satan pride thereby misleading many to hell. (See Genesis 3:17-19).
- 187. Since I love God, and seek to love God by loving others, God and I are at a loss as Defendant misleads folks to the second death.
- 188. Any of Defendant's alleged religious purposes do not remove his violations of the laws in this case.

- 189. I believe Defendant reflects a little piece of hell on earth by his absence of love, which is the absence of God.
- 190. I believe Defendant models misbehavior that encourages folks to become children of the devil, instead of children of God, under the guise of God.
  - 191. I believe the Defendant reflects the image of the devil.
- 192. I believe but for Defendant's illusion of Godliness, many people would not be misled to the way of hell, should they remain in confusion without repentance.
- 193. I believe the Defendant reflects the mark of the beast by what he thinks about as if written on his forehead, and by how he lives as if written on his hand. (See, Revelation 13:16-17, "And the second beast required all people small and great, rich and poor, free and slave, to receive a mark on their hand or on their forehead, so that no one could buy or sell unless he had the mark, the name of the beast, or the number of its name." I believe money and material gain is on their forehead by what they think about, and on their hand by how they live, not love for one another, not love for God.); (See, Revelation 14:9-11, "If anyone worships the beast and its image and receives its mark on their forehead or on their hand, they, too, will drink the wine of God's fury, which has been poured full strength into the cup of his wrath. They will be tormented with burning sulfur in the

presence of the holy angels and of the Lamb. And the smoke of their torment will rise for ever and ever. There will be no rest day or night for those who worship the beast and its image, or for anyone who receives the mark of its name."'): (See. Revelation 16:2, Revelation 13:16 and Revelation 19:20, and ); (See, Revelation 20:4 Not everyone chooses the mark of the beast. The number of the beast is 666, representing the amount of gold in Solomon's temple); (See, 1 Kings 10:14 and 2 Chronicles 9:13, "The weight of the gold that Solomon received yearly was 666 talents." This relates to the number of the beast 666, meaning greed, gluttony and self-gain.); (See, Revelation 13:18, "This calls for wisdom. Let the person who has insight calculate the number of the beast, for it is the number of a man. That number is 666." I believe the man is the devil. The devil is called a man in Isaiah Chapter 14.); (See Isaiah 14:16, "Those who see you stare at you, they ponder your fate: "Is this the man who shook the earth and made kingdoms tremble,""); (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."); (1 John 4:4, "You, dear children, are from God and have overcome them, because the one who is in you is greater than the one who is in the world.").

194. The mark of the beast is also the mark of a whore. In Jeremiah 3:3, the prophet told the people they have the forehead of a prostitute, by what they

think about, as if written on their forehead, money and material gain instead of God.

- 195. I believe the prophets also call people prostitutes in Scripture for exchanging their trust in God for something else like money or material things, thereby they work for material gain not spiritual riches, giving their lives, selling their lives, their works, for mere money, instead of God. (See, Matthew 6:19-21, Jesus instructed, "Do not store up for yourselves treasures on earth, where moths and vermin destroy, and where thieves break in and steal. But store up for yourselves treasures in heaven, where moths and vermin do not destroy, and where thieves do not break in and steal. For where your treasure is, there your heart will be also."").
- 196. I base my belief, in part, because the Holy Spirit through a prophet scolds his people for trying to be loved by the world by material gain only to hurt themselves: Ezekiel 16:32-34 provides;

"You adulterous wife (meaning unfaithful to God)! You receive strangers instead of your own husband! Men give gifts to all their prostitutes, but you gave gifts to all your lovers. You bribed them to come to you from everywhere for your illicit favors. So your prostitution is the opposite of that of other women: No one solicited your favors, and you paid a fee instead of receiving one; so you are the very opposite!"

- 197. I believe the mark of the beast is business greed, by barter or exchange, conditionally caring without unconditional love, living for mere rewards and benefits without sacrificial unearned love towards others.
  - 198. Business is not the sin.
  - 199. Business greed is the sin.
- 200. When people like Defendant love money more than people he uses to get money or material gain, I believe he chooses to reflect a little piece of hell on earth.
- 201. I believe people can participate in business and love the people they may gain funding from more than the money they receive or potentially may receive.
- 202. I believe Jesus when he says "You cannot serve God and money." (Citing, Matthew 6:24.)
- 203. I believe "the love of money is the root of all evil: which while some coveted after, they have erred from the faith, and pierced themselves through with many sorrows." (Citing, 1 Timothy 6:10, King James version.)
- 204. Defendant glorifies money, business greed, winning for self at the cost of harming or even bankrupting others.

- 205. I believe Defendant glorifies business, and teachings many to mind their own business without concern for others.
- 206. I believe people go to hell for merely minding their own business since their minds are not on loving others unconditionally by concern, thought and deed.
  - 207. I believe children of God are known by their love.
- 208. I believe children of the devil are known by their absence of love. (See, John 13:35, "By this everyone will know that you are my disciple, if you love one another.)
- 209. Children of God are marked on their forehead and on their hand, by the love of God in their hearts which reflects what they think about, as if written on their forehead, and on their hand by how they live. (See Ezekiel 9: 4, "and said to him, "Go throughout the city of Jerusalem and put a mark on the foreheads of those who grieve and lament over all the detestable things that are done in it."

  Those who grieve because of the sins of others were marked of God and not to be destroyed in hell on judgment day); (See, Exodus 13:9, Exodus 13:16,

  Deuteronomy 6:8, Deuteronomy 11:18, relating to God's love and guidance which teaches us we are loved and to love, and is to be remembered as if written on our foreheads and on our hand, by how we live.)

- 210. I believe Trump glorifies the punishments for the original sin, and the fruits of the punishment such as sex and money, loyalty, or martyrdom, teaching pride that damns people to hell instead of receiving edification via humility leading to salvation relating to "toiling in the soil," work, child bearing, marriage and death. (See Genesis Chapter 3 regarding original sin and the punishments for original sin.)
- 211. I believe Trump is encouraging others to misbehave by glorifying the punishments and the fruits of the punishment of original sin as Godly or good, thereby misleading them to hell.
  - IV. DEFENDANT EXACERBATES STRAINS AND TENSIONS
    INSTEAD OF ALLEVIATING THEM ENCOURAGING
    FOLKS TO GIVE INTO TEMPTATION TO SIN TO THEIR
    DESTRUCTION IN HELL FOR ABSENCE OF LOVE
    REPLACED BY FEAR UNDER THE GUISE OF GODLINESS
- 212. Trump exacerbates tensions relating to sex, place of origin, disease and death, religion, race, and economic strains instead of alleviating them, thereby increasing temptations for people to sin by giving into fear, which drives out love, misleading people to hell under the illusion of Godliness.

- 213. Per 1 John 4:18, "Love drives out fear". (Id. "There is no fear in love. But perfect love drives out fear, because fear has to do with punishment. The one who fears is not made perfect in love.")
  - 214. Accordingly, I believe fear drives out love.
- 215. Defendant Trump increases fear and anxieties instead of loving those he is charged to care for by alleviating legitimate concerns.
- 216. The Bible teaches the cowardly do not go to heaven. (See, Revelation 21:8, "But the cowardly, the unbelieving, the vile, the murderers, the sexually immoral, ..., the idolaters and all liars—they will be consigned to the fiery lake of burning sulfur. This is the second death.")
- 217. Fear is sin. The bible teaches us not to be afraid, with the caveat to fear the Lord as he will damn you for harming yourself or others God loves. (See, Deuteronomy 31:6, 1 Chronicles 22:13 and 2 Chronicles 32:7, "Be strong and courageous. Do not be afraid ..."); (See, Luke 12:4-5, "I tell you, My friends, do not be afraid of those who kill the body and after that can do no more. 5But I will show you whom you should fear: Fear the One who, after you have been killed, has authority to throw you into hell. Yes, I tell you, fear Him!"); (See, Psalm 27:1); (See, 1 Samuel 12:14, and Joshua 24:1 "Fear the Lord").

- others outside of their own, instead of loving them as I believe God commands, replacing love in their hearts with indifference, unconcern, bitterness, cowardly self defense or hate, misleading them to hell, should they not repent. (See, Ezekiel 16:49, "Now this was the sin of your sister Sodom: She and her daughters were arrogant, overfed and unconcerned; they did not help the poor and needy." People are damned to hell for unconcern and ignorance, the decision not to care, not to love.); (See, Matthew 25:45-46, "He will reply, 'Truly I tell you, whatever you did not do for one of the least of these, you did not do for me. Then they will go away to eternal punishment, but the righteous to eternal life." People go to hell for choosing not to love, by *inter alias*, ignoring those in need.).
- 219. I believe Defendant also misleads people to hell by teaching them to exploit others, especially the needy, to serve themselves, their own families or own people's material gain which is great sin.

## A. MISTREATMENT OF WOMEN

220. Trump sins against God by conduct demeaning women by lusting after them, or objectifying them based on looks instead of the content of their heart. (See, 'You Can Do Anything': In 2005 Tape, Trump Brags About Groping, Kissing Women, By Jessica Taylor, October 7, 20166:05 PM ET,

https://www.npr.org/2016/10/07/497087141/donald-trump-caught-on-tape-making-vulgar-remarks-about-women); (Also see, 11 insults Trump has hurled at women, by John Walsh, Oct 17, 2018, 3:26,
https://www.businessinsider.com/trumps-worst-insults-toward-women-2018-10);
(Also see, BBC, What are the sexual allegations against Donald Trump?, dated June 25, 2019, https://www.bbc.com/news/world-us-canada-48754967); (Also see, The Guardian, The Trump allegations A list of the sexual misconduct accusations made against Donald Trump. He has denied the allegations, by Lucia Graves and Sam Morris, Last updated Wednesday 6 November 2019,
https://www.theguardian.com/us-news/ng-interactive/2017/nov/30/donald-trump-sexual-misconduct-allegations-full-list).

- 221. Trump's lustful words and deeds mislead people I love to dismiss this sin when Jesus Christ says it is better to tear out your eye balls than to be thrown into hell for wrongfully lusting after women. (Citing Jesus Christ in Matthew 5:27-30).
- 222. Trump sins against God by demeaning women as things to look at, use, or do instead of people to honor and respect.
- 223. I believe sex is marriage before God whereby a man becomes a servant of his wife until he dies. A man who does not live to serve her, cheapens

the one he covenanted before God to protect, by relations, sex, without sacrificing his life to care for and serve hers until he dies, thereby sinning against God. (See, Malachi 2:16, "The man who hates and divorces his wife," says the LORD, the God of Israel, "does violence to the one he should protect," says the LORD Almighty. So be on your guard, and do not be unfaithful."); (Also see, Hosea 4:14, "I will not punish your daughters when they turn to prostitution, nor your daughters-in-law when they commit adultery, because the men themselves consort with harlots and sacrifice with shrine prostitutes-- a people without understanding will come to ruin!" Thus, I believe men will be condemned to hell, not the women they exploited to serve lusts, merely for becoming victims of men's misdeeds.); (Citing, Matthew 19:4-6); (Also see, Genesis 2:24, "Jesus answered, 'Have you not read that from the beginning the Creator 'made them male and female,' and said, 'For this reason a man will leave his father and mother and be united to his wife, and the two will become one flesh? So they are no longer two, but one flesh. Therefore what God has joined together, let man not separate."'); (See, Genesis 20:2, Genesis 24:67, Genesis 12:19, Genesis 20:1-4, Cf., Genesis 12:19, I believe "took her as my wife" means having sex with a woman.)

- 224. Jesus teaches leaders are servants. (See, Matthew 23:11 and Luke 22:26.)
  - 225. In Ephesians 5:23, I learn husbands are leaders to their wives.

- 226. Thereby I believe husbands, as leaders, are servants to their wives. Husbands feed, care for and tend to their wives. Misleaders, teach husbands to enslave wives, instead of teaching husbands to be servants. Misleaders like Defendant teach men to be servants of self.
  - 227. I believe Servants of self are servants of Satan, and servants of sin.
- 228. Servants of self exploit those they profess to serve, misleading and deceiving them, under the guise of helping them, to instead help themselves instead.
- 229. I believe Defendant exploits women, demeaning them, to instill pride in self and in other men which thinking I believe damns people to hell.

## **B. MISTREATMENT OF FOREIGNERS**

- 230. I believe Trump persecutes the foreigner by his policies at the Border, when the Bible teaches us to love foreigners as ourselves. (See Exhibit 7, please refer to the article of impeachment I drafted related to the border).
- 231. The Bible in Leviticus 19:34 provides, "The foreigner residing among you must be treated as your native-born. Love them as yourself, for you were foreigners in Egypt. I am the LORD your God."

- 232. The Bible in Exodus 22:21 commands, "You must not exploit or oppress a foreigner resident, for you yourselves were foreigners in Egypt."
- 233. The Bible in Deuteronomy 10:19 commands, "So you also must love the foreigner, since you yourselves were foreigners in the land of Egypt.".
- 234. Defendant encourages the people to violate these commands by instilling unconcern, absence of love and bitterness for those who may compete for jobs and resources, instead of loving them, not exploiting them or resenting them for the love of money.
- 235. "They can't get jobs, because there are no jobs, because China has our jobs and Mexico has our jobs,' Trump said." (Citing, ABC News, *Donald Trump Sells Chinese Goods Despite Accusing China of Stealing US Jobs, Trump says he's "obligated" to buy Chinese goods while China has U.S. jobs.*, By SUSANNA KIM, June 17, 2015, 2:45 PM,

https://abcnews.go.com/Business/donald-trump-sells-chinese-goods-accusing-china-stealing/story?id=31826791).

## C. ADDITIONAL ECONOMIC STRAIN

236. I believe a good leaders care for those they are charged to serve and teach those they serve to be great too by serving one another, not exploiting one another to serve business greed or self gain. (See Matthew 23:11)

- 237. I believe good leaders alleviate economic strains, instead of ignoring or exploiting them, by at least giving those the leaders serves notice to prepare for foreseeable harm so as to reduce the harmful impact.
- 238. I believe Trump is increasing temptations to sin by driving out love replaced by fear, leading many people to hell by exacerbating desperate conditions instead of alleviating them, fanning the flames of disease and death, racial tensions, political tensions, economic tensions, religious tensions, and gender based tensions, under the illusion of Godliness.
- 239. Defendant increases desperate conditions by his failure to care for those he serves, exacerbating harm, and thereby, increasing the temptation for the people he is charged to serve, to sin, by focusing on money, misleading them to hell.
- 240. I believe defendant exacerbates desperate conditions to exploit the masses he is charged to serve tempting them to serve greed, trust in money, to be damned to hell.
- 241. Defendant teaches people to serve greed instead of teaching them to care for one another which leads people to hell. (See, Acts 8:20, "Peter answered: 'May your money perish with you, because you thought you could buy the gift of God with money!"). (People are more valuable than money. God commands us to

love people not money. In John 13:34, Jesus said "A new command I give you: Love one another. As I have loved you, so you must love one another.")

- 242. Defendant increases the probability of welfare, social security,

  Medicare and retirement will be reduced by his policy of ignorance and

  exploitation by discouraging love for one another, and encouraging business greed,

  thereby tempting people to love money, seek to trust in and protect money, while

  driving out their love for others, misleading many people to hell.
- 243. I believe there is always a way out from sin. (See, 1 Corinthians 10:13, "No temptation has overtaken you except what is common to mankind. And God is faithful; he will not let you be tempted beyond what you can bear. But when you are tempted, he will also provide a way out so that you can endure it.")
- 244. Should social security be eliminated or reduced, Defendant may choose to persuade Congress to lift the cap on the social security tax, which would increase funding so all earned wages would be taxed. Or in the alternative, Defendant may encourage congress to apply social security taxes upon higher waged earners to encourage businesses to not only pay their employees more to avoid paying more in taxes, but also to increase tax revenue to help fund social security to take care of the elderly.

- 245. Additionally, Congress has the power to coin money without borrowing it during the duration of the pandemic. Congress has the power to bail out all Americans \$2,000.00 a month, with back pay from the inception of the national emergency to alleviate the economic strain to take care of the people instead of exploiting them to serve business greed. It is okay if Americans boost other economies by buying international goods. I believe other people are not our enemies. They merely are people who live somewhere else, people Jesus commands us to love not exploit to serve greed.
- 246. Instead of alleviating desperate economic strains by implementing policies and encouraging laws that care for the people, the Defendant exacerbates economic strains to serve those who may serve him, thereby serving himself, at the expense of those he is charged to serve.
- 247. Defendant encourages polluting factory jobs, which I believe will become low paying, back breaking and polluting bad investments, causing not only money losses, but also loss of life, health and permanent destruction to the environment affecting the lives and health of future generations.
- 248. Under the guise of helping people Defendant merely seeks to exploit them under his policy of job encouragement, to serve himself through bartered favors, at the expense of those he is charged to serve.

- 249. I believe the United States does not have the laws to protect the environment and people required should more factories be built.
- 250. I believe the initial salaries for potential factory workers may be higher now, before foreseeably, losing a hundred fold of profits down the line as the global businesses open up and compete and create improvements off the backs of bad investments made to fail here at home, reducing salaries here while leaving the scars of loss of health, life and pollution, while reducing factory workers' salaries, or eliminating jobs by automation or due to loss of profit.
- 251. Additionally, the suppliers of raw materials such as North Korea and Russia, may tempt businessmen and businesswomen into forming factories by offering low costs for materials, as they may collude in get rich quick business schemes with American businessmen and women to make money off of failing in America too. Once the factories are built and investment and debt is incurred, the suppliers may increase the prices down the line reducing profit and thereby encouraging the temptation for the factory owners to reduce the salaries of their workers.
- 252. Defendant allegedly seeks to bring manufacturing or factory jobs to the United States.

- 253. I believe there is no foundation of success for factory jobs, just stress, distress and failure at this time.
- 254. I believe Defendant tempts people to sell or enslave people's souls in exchange for salaries, to serve business greed, by his jobs rhetoric, only to harm them down the line, by creating jobs where people will be exploited for profit, taken advantage of under the guise of being taken care of. (See, CNN, Trump wants to create 10 million jobs in 10 months. Here's why that might be tricky, By Anneken Tappe, CNN Business, Updated 12:24 PM ET, Fri August 28, 2020https://www.cnn.com/2020/08/28/economy/trump-10-million-jobs/index.html).
- 255. Those in charge of manufacturing companies or factories may escape personal culpability for the physical and economic harm they may foreseeably cause, including unpaid construction fees, while gaining profit, via resigning, entering the business into bankruptcies, not personal bankruptcies, and by receiving business bail outs, tax breaks or other government incentives.
- 256. I believe it is wrong when business people make money off of failure, while escaping personal culpability. Yet, I believe this is the foreseeable result of Defendants' economic model.

- 257. I believe bad business, made to fail business is made more profitable for some big businesses at this time, under the Defendant's administration.
- 258. The Defendant appears to have made profit despite failed bankrupted businesses, which is evidence that bad business, also known as, made to fail business is often profitable in America, by those who exploit our unjust laws.
- 259. The Internal revenue allows for businesses, including farmers, if requirements are met, to take deduction for losses against profits for about three years back or three years forward if they spill, kill or destroy food or products under 26 U.S. Code § 1212.
- 260. During this pandemic, sales for some products around the globe has foreseeably decreased as governments have partially, temporarily closed down certain sectors of the economy around the globe.
- 261. Thus, many big businesses likely will receive less revenue from products sold, albeit they may have artificially increased stocks by stock buy backs, creating the appearance of an economic boom or stability, while possibly maintaining high salaries or even giving bonuses to those in charge for such manipulated increase in stocks.

- 262. Many businesses will be foreseeably tempted to enter into Bankruptcy, insulating many salaries and bonuses given to people by businesses and entities, who work in made to fail, made to bankrupt, businesses or entities.
- 263. Since, profit loss for big businesses is increasingly likely during the pandemic as factories or entities partially shut down, businesses have a decreased incentive to give products or food or products away since the businesses cannot deduct charitable donations against such losses, during a year they made little to no profit under the tax code, unless the Cares act amended this.
- 264. Thus, many businesses, had an incentive to destroy or throw out products to take advantage of the rule deducting losses against future or past profit, instead of giving to charities.
- 265. In addition, businesses are more likely eligible for business bailouts or business loans if they declare losses by killing, spilling or destroying food or products by throwing them out.
- 266. Many Americans may remain hungry as farmers spilled milk literally, with the incentive to gain the tax write off and or eligibility for bailouts or loans.
- 267. By trashing products and items to gain monetary advantage, business men and ladies increase pollution in wasteful production, for throw away items while also filling up the landfills.

- 268. The three year forward and back business tax break is a tool to monopolize supply to maximize business profit at the cost of harming people's lives, health and the environment.
- 269. I believe the Defendant is increasing the risk of an artificial, intentional, manufactured stock market crash that will foreseeably occur down the line by choosing not to discourage made to fail businesses, where even state and local government employee's pensions may be at risk of reduction or loss in Chapter 9 bankruptcies, thereby tempting folks to focus on money instead of God, by exacerbations of desperate conditions, misleading many to hell.
- 270. I believe the tax break for charitable donations serves Satan and damns people to hell. I believe this tax rule drives out unconditional love from the hearts of men replaced with business greed by barter or exchange. (Citing Matthew 6:1-5, and 26 U.S. Code § 1212).
- 271. I believe Defendant's is misleading people to give to charities years down the line to take advantage of this unholy rule, the charitable tax deduction rule, thereby misleading them to hell for the praise of men or some other benefit. (26 U.S. Code § 1212).
- 272. I believe Defendant encourages violations of the 13th amendment, forced servitude by increasing the conditions to foreseeably reduce and, or remove

welfare, thereby increasing desperate conditions that force people to work, and encouraging organized charity which I believe damns people to hell forever, should they not repent.

- 273. I believe pro bono, fundraising, volunteering, organized charity, and even selling girl scout cookies is a great sin that damns people to hell, and those they mislead too, should they not repent of such evil.
- 274. In Matthew 6, Jesus commands do not give charitable love seen. I believe it is better not to give anything than to give charity recognized. Jesus teaches when you give charitable alms, do not know your left hand from your right hand, meaning do not give out of one hand to get out of the other. By teaching giving to get is charitable love, people wrongly learn business by barter or exchange is love, driving out the love from the hearts of man, replaced with the love of money, the mark of the beast, the mark of the damned as good, business greed. (Citing Matthew 6:1-4); (See, Romans 4:4 "Now to the one who works, wages are not credited as a gift but as an obligation." Love is not business and can not be bought or bartered for.)
- 275. Like "hypocrites" many who encourage charitable donations, teach giving money is good. (Citing Matthew 6:2). So, if someone has no money to give, they wrongly learn they can not be good. Next thing you know, people are

tempted to demean the needy they beg for, calling them deadbeats, lazy, worthless and other ugly, untrue things.

- 276. Compromising Jesus's words for man's material gain only harms and misleads the people for temporary benefits.
- 277. It is not worth selling souls for a bowl of soup, or food, or to encourage charitable alms which violate Jesus's teachings, no matter how starving someone is, since it misleads people to eternal death in hell. (See, Genesis 25:29-34, This is the story of Jacob and Esau where Esau sold his birthright for a bowl of soup)
- 278. I believe we do not live by bread alone but feed our soul with every word of God for eternal life. (Citing, Deuteronomy 8:3, Matthew 4:4, Luke 4:4).
- 279. I believe those who live on bread alone, meaning money and material things or people they may seek to buy by loyalty or favors, do not have eternal life.
- 280. Defendant also donated his salary. (USA TODAY, Fact check: President Donald Trump donates his salary, but he still makes money, by Molly Stellino, published July 11, 2020,

https://www.usatoday.com/story/news/factcheck/2020/07/11/fact-check-donald-trump-donates-salary-but-he-still-makes-money/5410134002/).

- 281. I believe the Defendant sins against God and man for donating his salary because it violates Jesus Christ's teachings not do charitable alms recognized.
- 282. I believe the Defendant misleads people to hell by donating his salary, under the guise of good or Godliness.
- 283. Defendant models misbehavior, some Americans follow under the guise of good, thereby misleading them to hell by sinful thinking. (Isaiah 9:16 "For the leaders of the people have misled them. They have led them down the path of destruction," meaning hell, the final death); (Matthew 15:14, "Disregard them! They are blind guides. If a blind man leads a blind man, both will fall into a pit." meaning hell); (Matthew 23:16 "Woe to you, blind guides! You say 'If anyone swears by the temple, it means nothing; but if anyone swears by the gold of the temple, he is bound by his oath."); (Micah 3:5 "This is what the Lord says: 'As for the prophets who lead my people astray, who proclaim peace while they chew with their teeth, but declare war against one who puts nothing in their mouths.")
  - 284. As a Christian, I love all people.
- 285. I believe some people are misled to hell under the guise of heaven by Defendant's leadership.

286. The Defendant has not chosen to scold Americans use of violence toward human life and health, or to discourage the use of violence against people as opposed to property, and so he encourages violence by inciting passion, so the people sin, leading to hell, instead of encouraging truth in love and guidance. ('No Blame?' ABC News finds 54 cases invoking 'Trump' in connection with violence, threats, alleged assaults. President Donald Trump insists he deserves no blame for divisions in America. By, Mike Levine, May 30, 2020, 8:20 AM, https://abcnews.go.com/Politics/blame-abc-news-finds-17-cases-invokingtrump/story?id=58912889&fbelid=IwAR0lxUvVytdnrT2EahtVznEzSudldtMU9SBee gORxyOLua025FmPoqe Wo); Washinton Post, The Trump administration said that militarizing the police reduces crime. Is that true?, by Ayse Eldes and Kenneth Lowande, June 1, 2020 at 5:00 a.m. EDT, https://www.washingtonpost.com/politics/2020/02/26/trump-administration-says-

https://www.washingtonpost.com/politics/2020/02/26/trump-administration-says-that-militarizing-police-reduces-crime-is-that-true/); (See, CBS News, "When the looting starts, the shooting starts": Trump tweet flagged by Twitter for "glorifying violence", MAY 29, 2020 / 1:16 PM / CBS/AP

https://www.cbsnews.com/news/trump-minneapolis-protesters-thugs-flagged-twitter/ The president encouraged violence by tweeting when the looting starts the shooting starts).

- 286. The Defendant failed to admonish neo Nazis, white nationalists or kkk members against the use of violence after people were harmed or killed by their alleged members.
  - 287. I believe my God teaches the use of violence is wrong.
- 288. I believe might does not make right. Might makes wrong. (See, Wisdom 2: 10-11 regarding how children of the devil think. "Let us oppress they needy just man; let us neither spare the widow, nor revere the old man for his hair has grown white with time. But let our strength by our norm of justice; for weakness proves itself useless.")
- 289. Defendant's policies encourage the destruction of the environment to serve greed through his executive orders encouraging drilling for oil and gas in the United States territories. (See Exhibit 8 attached, please find a document I drafted and sent to federal law makers in hopes to prevent the destruction of our environment triggered by Defendant's related executive orders, which would in turn cause desperate conditions, tempting folks to sin.)
- 290. According to worldometer, coal, gas and oil will run out in a calculated number of years. (See, https://www.worldometers.info/).

- 291. Accordingly, investing in energy that will run out is not a wise monetary investment, nor does it serve the lives and health of the American people or our environment.
- 292. I believe Defendant's dirty energy policies serve Satan by "kill(ing), steal(ing) and destroy(ing)" lives to serve Defendant's self-gain by barter or exchange, even gaining personal loyalty by those who profit by such dirty energy dealings. (Citing, John 10:10, "The thief comes only to steal and kill and destroy; I have come that they may have life, and have it to the full.")
- V. SPECIFIC EXAMPLES WHERE DEFENDANT CREATES THE
  ILLUSSION OF SUPPORTING CHRISTIANITY, THEREBY
  SUPPRESSING OTHER DIFFERENT BELIEFS, INCLUDING MY
  BELIEFS IN CHRISTIANITY THEREBY MISLEADING PEOPLE I
  LOVE TO HELL, DESTROYING SEPARATION OF CHURCH AND
  STATE, MAKING US ALL LESS FREE
  - A. APPOINTMENT OF PERSONAL SPIRITUAL ADVISOR,
    AND ALLEGED CHRISTIAN LEADERS ADVIZING THE
    DEFENDANT CREATING THE APPEARANCE OF SUPPORT OF
    CHRISTIANITY

- 293. Plaintiff, Meghan Kelly, repeats and incorporates by reference all of the above paragraphs and all of the below paragraphs, and the Exhibits and citations, the paragraphs refer to herein as admissible under nonhearsay and hearsay exceptions, including but not necessarily limited to, probative fact, state of mind, belief, present sense impression, periodical exception, excited utterance, admission by party opponent, as though set forth herein in the first instance.
- 294. Defendant Trump is misleading people I love to hell by appearing to buy church support, or apparent backing by God or apparent support of God, by bartering favors by allowing influence in his cabinet by certain Christian leaders, and by signing an executive order allegedly making it easier for churches and other religious groups to engage in politics without endangering their tax-exempt status. (See, Trump eases ban on political activity by churches, By Jordan Fabian and Naomi and Jagoda, 05/04/17 11:58 AM EDT,

https://thehill.com/homenews/administration/331902-trump-eases-ban-on-political-activity-by

churches#:~:text=President%20Trump%20signed%20an%20executive%20order% 20Thursday%20making,organizations%20during%20a%20National%20Day%20of %20Prayer%20event.)

295. "Florida televangelist Paula White, who has served as a spiritual adviser to President Trump, (joined) his administration in an official capacity,

according to a senior administration official and another person familiar with the move." (Citing, Washington Post, Paula White, Trump's key spiritual adviser, will join the White House, By Sarah Pulliam Bailey November 1, 2019 at 1:35 p.m. EDT, https://www.washingtonpost.com/religion/2019/11/01/paula-white-trumps-key-spiritual-adviser-reportedly-will-join-white-house/).

- 296. Paula White, heads the "White House's Faith and Opportunity Initiative, a successor to previous administrations' faith-based office that coordinates outreach to religious communities." (Citing, Religious News Service, Paula White to head Trump's faith office, by Jack Jenkins and Adelle M. Banks, November 1, 2019, https://religionnews.com/2019/11/01/paula-white-to-head-trumps-faith-office/?utm\_source=RNS+Updates&utm\_campaign=98de8ad604-EMAIL\_CAMPAIGN\_2019\_01\_09\_06\_29\_COPY\_02&utm\_medium=email&utm term=0\_c5356cb657-98de8ad604-116936653 ).
- 297. The following Christian leaders, in their capacity as spiritual advisors, allegedly are members, or were members of the Defendant's advisory board, according to the National Catholic Reporter; Gary Bauer, Mark Burns, Tim Clinton, James Dobson, Jordan Easley, Jerry Falwell Jr., Ronnie Floyd, Jack Graham, Rodney Howard-Browne, Harry Jackson, Robert Jeffress, Richard Land, Greg Laurie, Eric Metaxas, Johnnie Moore, Frank Page, Tony Perkins, Ralph Reed, Tony Suarez, and Paula White. (Citing, National Catholic Reporter, The key

evangelical players on Trump's advisory board, Sep 5, 2017, by Adelle M. Banks, Religion News Service, https://www.ncronline.org/news/politics/key-evangelical-players-trumps-advisory-board).

298. The inclusion of powerful Christian leaders on the Defendant's advisory board creates the inherent illusion of government backing of one religious group who hold certain religious beliefs or the actual backing of one religion, while suppressing others, making Americans less free to worship or not under the threat of government persecution by inherent suppression by the de facto display of government support of one belief or religious group over others.

#### B. HOLDING UP A BIBLE IN FRONT OF A CHURCH

- 299. In early June, the Defendant held up a bible as he posed for a photo outside the damaged St. John's Episcopal Church located at Lafayette Square, on the same day government agents tear gassed protestors.
- 300. This act of holding up a religious symbol, the Word of God misleads many folks I love to believe supporting Trump's misbehavior, also known as sins, such as the use of violence, such as government violent persecution by gassing protestors while exercising their freedom of association and speech, supports God.
- 301. This act of holding up the bible misleads people I love to believe the Defendant is receiving the backing of God.

- 302. Trump violated the establishment clause by creating the appearance of supporting a religion, thereby chilling the views of those with diverse views, while encouraging a false belief in Jesus's teachings, and turning others who do not believe in Jesus away from Christianity.
- 303. The act of holding up the bible misleads people I love to believe Trump's sinful behavior is okay or even cleansed by God when it is not, without repentance.
- 304. This act misleads people I love to believe sin is ok, when sin leads to the second death, loss of eternal life without repentance. (Luke 13:3, "But unless you repent, you too will all perish," meaning in hell, the second final death); (Luke 13:5, "I tell you, Nay: but, except ye repent, ye shall all likewise perish.")
- 305. I love all people including my enemies, and those I do not know. So, even if one person is misled by remaining under the deception of Defendant's use of religion for his own vanity, use of the Bible, the Word of God, religion, for his own purpose in place of God under the guise of serving God, I face harm at losing the opportunity to feel a fuller type of love with them on judgment day.
- 306. Trump appeared to support the religion Christianity by holding up the bible, and other activity discussed herein, creating the communication of state sponsored religion.

- 307. The Defendant told Fox News, "I think it was a beautiful picture, ... And I'll tell you, I think Christians think it was a beautiful picture." (Citing, Fox News, Trump responds to Milley apology for Lafayette Square photo op, By Brooke Singman, published June 12, 2020, phttps://www.foxnews.com/politics/trump-responds-to-milley-apology-for-lafayette-square-photo-op
- 308. This activity purports to give Defendant's backing to Christianity, and evidences his desire to be backed by Christians based on their religious beliefs.
- 309. This activity purports to give God's backing to Trump for using the Word of God, the Bible, to be used for Trump's governing purpose, also known as Trump's vanity under the guise or illusion of a religious purpose.
- 310. Trump misleads people I love to believe serving sin is serving God, by holding up the Bible.
- 311. Trump misleads people I love into believing serving greed is serving God when Jesus teaches "You cannot serve God and money." (Citing, Matthew 6:24).
- 312. I believe those who glorify money gained by barter or exchange, business greed as their heart's desire in place of God's will, will be damned to hell should they not repent. (See, Matthew 7:21, "Not everyone who says to me, 'Lord,

Lord,' will enter the kingdom of heaven, but only the one who does the will of my Father who is in heaven."); (See, John 14:23, "Jesus replied, 'Anyone who loves me will obey my teaching. My Father will love them, and we will come to them and make our home with them."); (Also see, John 8:51, "Truly, truly, I tell you, if anyone keeps My word, he will never see death," meaning the second death, absence of eternal life).

313. Trump misleads people I love into believing serving their own will, in place of God's will is Godly by Trump's modeling of misbehavior, lovelessly living for self like Satan does, as shown in Isaiah 14:13-14, placing self first like Satan, instead of laying down their lives for God by their love for God foremost, and subordinately, loving others as themselves, including their enemies. (Mark 12:30-31 "Love the Lord your God with all your heart and with your soul and with all your mind and with all your strength...Love your neighbor as yourself""); (See Luke 10:29-37. Neighbor includes those who cannot ever pay you back for the material or monetary sacrificial benefit conferred by praise, barter or monetary exchange.); (Citing, Matthew 7:11, Luke 11:13, Merely conditionally caring for your own is not unconditional love. "Even (those) who are evil give good things to their children."); (See, Matthew 16;24, Luke 9:23, Mark 8:34 regarding, laying down our lives by picking up cross for Jesus by denying self, placing God first not our own desires first.) (1 Corinthians 13:4-8, "Love is not self seeking").

- 314. Trump misleads people I love to hell by teaching the punishments for original sin is the reason to live. I believe the punishments are meant to teach humility leading to salvation instead of pride leading to damnation. The punishments are meant for edification by loving guidance even when we are corrected. The punishments and the pursuit of the fruits of the punishments is not the purpose of our lives.
- 315. Those who glorify the punishments work, marriage and child rearing and the fruits of such money, sex, exploiting or using spouses and children to serve business greed as the reason to live to reflect evil, absence of love, absence of God, conditionally caring with no unconditional love, the sins of pride, greed, lust and evil self seeking ambition, instead of receiving humility leading to salvation, reflect a little piece of hell on earth. Pride is sin. (See, Leviticus 26:19, Obadiah 1:3, Psalm 59:12, Psalm 73:6, Isaiah 9:9, Jeremiah 13:17, Proverbs 29:23, Zephaniah 2:10, Proverbs 8:13, Proverbs 16:18, Proverbs 11:2, Jeremiah 48:29, Isaiah 16:6. Glorifying and trusting in works, in business and in people in place of God is great sin.); (See, Proverbs 11:28, "He who trust in his riches will fall (meaning into the pits of hell), but the righteous will thrive like foliage..); (See, Psalm 62:10, "Look at the man who did not make God his refuge, but trusted in the abundance of his wealth, who strengthened himself brining destruction."); (See, Micah 7:5, "Do not trust a neighbor; put no confidence in a friend. Even with the

woman who lies in your embrace guard the words of your lips."); (See, Jeremiah 9:4 "Beware of your friends; do not trust anyone in your clan. For every one is a deceiver, and every friend a slanderer.")

- 316. I place my trust in God. (Psalm 118:9 "It is better to take refuge in the LORD than to trust in princes."); (Psalm 91:2 "I will say of the LORD, "He is my refuge and my fortress, my God in whom I trust.")
- 317. I believe the purpose to live is more glorious than the punishment or the fruits of the punishments for original sin.
- 318. I believe the purpose of life is to love because we were created because God loves us, and to gain eternal life by such love, to love God foremost, to love self, and love others as self thereby reflecting the image of God because "God is love." (Citing, 1 John 4:16, 1 John 4:8).
- 319. The purpose of life is not to reflect the image of Satan by living for self, seeking to be loved when we are already loved by God. (1 John 4:19,"We love because he first loved us.")
- C. DEFENDANT HYPOCRITICALLY CLAIMS "BIDEN WILL HURT
  THE BIBLE" AFTER DEFENDANT HELD THE BIBLE UP FOR HIS
  OWN VANITY EARLIER THIS SUMMER

- 320. "President Trump ... claimed presumptive Democratic presidential nominee Joe Biden, a practicing Catholic, is 'against God' as he levied a stream of attacks on his likely opponent in the November election." Trump said, standing behind a podium with the presidential seal. 'Hurt the Bible. Hurt God. He's against God..." (Citing, The Hill, Trump claims Biden is 'against God' and will 'hurt the Bible' By Brett Samuels, 08/06/20 02:45 PM EDT, https://thehill.com/homenews/administration/510900-trump-claims-biden-is-against-god).
- 321. Defendant wrongfully presumes to be the authority on God while acting with government power, wrongfully persecuting his political opponent's religious identity, and indirectly persecuting his opponent's supporters under the inherent, actual threat of government persecution by ridicule or otherwise.
- D. TRUMP PERSECUTES PEOPLE WHO EXERCISED THEIR
  FREEDOM NOT TO WORSHIP, BY DEMEANING THOSE WHO
  OMITED THE WORD GOD IN THE PLEDGE OF THE
  ALLEGIANCE
- 322. "Trump took to Twitter to accuse Democrats of not uttering the word 'God' in the pledge at (the) Democratic National Convention." (Citing, The Hill, Trump targets Democrats over Pledge of Allegiance, By Tal Axelrod, 08/22/20 11:53 AM EDThttps://thehill.com/homenews/administration/513218-trumptargets-democrats-over-pledge-of-allegiance).
- 323. Trump tweeted "The Democrats took the word GOD out of the Pledge of Allegiance at the Democrat National Convention. At first I thought they

made a mistake, but it wasn't. It was done on purpose. Remember Evangelical Christians, and ALL, this is where they are coming from-it's done. Vote Nov 3!" Id.

- 324. Trump Suppressed the free exercise of religion by condemning the omission of the word God in the pledge of the allegiance, thereby creating a chilling effect of persecuting those who believe differently than the government sponsored belief espoused by the Government agent Defendant President Trump.
- 325. Defendant violated the freedoms of those he serves by persecuting people who worship or not according to the dictates of their conscience, not the dictates of the Defendant by omitting the Word God in the pledge of the allegiance.
- 326. Defendant may not lawlessly persecute folks for exercising the freedoms Defendant swore an oath to protect. (See *Lee v. Weisman*, 505 U.S. 577 (1992), "It is beyond dispute that, at minimum, Constitution guarantees that government may not coerce anyone to support or participate in religion or its exercise, or otherwise act in way which establishes state religion or religious faith or tends to do so. U.S.C.A. Const.Amends. 1, 14.")
  - 327. Defendant is not a Godhead.
  - 328. Defendant is a mere man.

## E. DEFENDANT IMPROPERLY SHARED HIS ALLEDGED PERSONAL TALK WITH HIS DEITY

- 329. In August, 2020, Defendant Trump improperly shared an alleged talk with his personal deity to a large group of Americans at a rally, while acting under the cloak of government authority as President of the United States. (Citing, HuffPost, Trump Claims COVID-19 Is God Testing Him After He Built 'Greatest Economy In History' The president described boasting to God about his economic successes before the coronavirus pandemic., By Carol Kuruvilla, , 08/17/2020 08:19 pm ET Updated Aug 20, 2020, https://www.huffpost.com/entry/trump-coronavirus-god-testing-him-building-economy\_n\_5f3af4f3c5b670ab17aec416?guccounter=1&guce\_referrer=aHR0cHM 6Ly93d3cuYmluZy5jb20v&guce\_referrer\_sig=AQAAAK\_pSPCqwjcLq5y\_w0V2 uiT1mdFxf\_h7AMxQDmAMkHuiYBYGtqCpk\_JeegXMdUbqyCbSuFixlTI\_h0hG HFFMWNzEDXhCtW7yrSR19O6qsnA\_gX9kpvYMQWvyf3er93TgeTKYe52Gk
- 330. Trump told supporters "You know what that is? That's God testing me,' ... "He said, 'You know, you did it once.' And I said, 'Did I do a great job, God? I'm the only one that could do it.' (God) said, 'That you shouldn't say, now we're going to have you do it again.'" Id.

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- 331. "Trump said, 'We built the greatest economy in the history of the world, and now I have to do it again,'" Id.
- 332. Defendant improperly shared his personal alleged discussion with his deity, with his supporters, thereby creating the illusion Defendant is supported by God or has a relationship with the Christian God, thereby supporting his alleged religious belief while suppressing others.
  - 333. Defendant also violated Jesus's teachings concerning prayer.
- 334. Jesus taught us we should pray in secret, not to be seen like the hypocrites who have their earthly reward. Our father who hears in secret will reward us openly, I believe on judgment day. (Citing, Matthew 6:5-8.)
- 335. Jesus even modeled how we should pray by going to lonely places to pray, not to gain the praise of man but of God as he leads us concerning his will. (See, Luke 5:16, "But Jesus often withdrew to lonely places and prayed."); (Matthew 14:23, "After He had sent them away, He went up on the mountain by Himself to pray. When evening came, He was there alone"); (Mark 1:35, "Early in the morning, while it was still dark, Jesus got up and slipped out to a solitary place to pray."); (Luke 3:21, "When all the people were being baptized, Jesus was baptized too. And as He was praying, heaven was opened."); (Luke 6:12, "In those

days, Jesus went out to the mountain to pray, and He spent the night in prayer to God.").

### F. DEFENDANT CREATED THE ILLUSSION THERE IS A WAR ON CHRISTMAS

- 336. Trump created an illusion that there was a war on Christmas.
- 337. The President asked,

"Do you remember they were trying to take 'Christmas' out of Christmas?" ... President Donald Trump saved America's right to speak the words 'Merry Christmas.' That's what Trump told the conservative student group, Turning Point USA, during a speech on Sunday in Florida. Trump explained that during his 2016 candidacy he promised to fix the issue of 'they' attempting to take the word 'Christmas' out of Christmas. Do you remember they were trying to take 'Christmas' out of Christmas? Do you remember? They didn't want to let you say 'Merry Christmas,' the president said. Trump then said that because he stated, during the campaign, 'They are going to say Merry Christmas again.' And now, he said, 'They are.' The president continued, 'That's the least of it, too. Because we got a lot of things that they're doing that they weren't doing." (Citing, The Rolling Stone, Trump: People Are Saying 'Merry Christmas Again' Thanks to Him, By Peter Wade, DECEMBER 23, 2019 4:42PM ET, https://www.rollingstone.com/politics/politics-news/people-are-sayingmerry-christmas-again-thanks-to-trump-930898/).

- 338. Not all people are Christians.
- 339. It is wrong to force the Defendant's claimed religious belief upon others.
  - 340. The Defendant is not God.

- 341. I believe God gives us free will, the choice to accept God's love, salvation and eternal life or to reject God's love by choosing the way to the final death.
- 342. Trump created the illusion that private citizens were not free to say Merry Christmas.
- 343. Private citizens are free to say Merry Christmas or not according to the dictates of their own conscience, not the required demands of the government or supporters of the government agent, the Defendant.
- 344. Government leaders, including Defendant, have more limited rights to support religion and holidays in order not to chill the religious freedoms of those Defendant serves because of the inherent threat by the cloak of government authority.
- 345. By creating the lie that private citizens could no longer say Merry Christmas, Defendant was supporting one religion and suppressing other Americans' freedom to worship or not according to the dictates of their own conscience not the dictates of the Defendant while acting under the cloak of government authority.
  - 346. There was no war on Christmas.

347. Trump manufactured the alleged war on Christmas to use my religion, Christianity, for his own vanity, for his own political purpose to garner support, sinning against God and man while violating the establishment clause of the Constitution.

## G. DEFENDANT CREATING THE ILLUSSION, HE MAY BE THE CHOSEN ONE BY GOD

- 348. In June 2020, "CBN News political analyst David Brody asked Trump about the claim that God put him "in office for such a time as this."" Citing, Fox News, 'I hope it's true': Trump responds to claim he was chosen by God, By Caleb Parke, June 25, https://www.foxnews.com/politics/trump-god-appointed-christian-interview).
- 349. Trump responded, "I almost don't even want to think about it,"
  Trump said. "Because you know what, all I'm gonna do is, I hope it's true. All I'm going to do is, I'm going to do my best." Id.
- 350. According to an article on Fox News, University professors say more churchgoers believe Trump is 'anointed by God', By Caleb Parke, May 13, 2020,

"In a 'Religion in Public' blog post ... titled 'Trump The Anointed?' Ryan Burge, assistant professor of political science and graduate coordinator at Eastern Illinois University, and Paul Djupe, an associate professor of political science at Denison University in Ohio, called it a 'phenomenon that is sweeping American religion.' "We were quite surprised by the result that

49 percent of those frequently attending worship services believed that Trump was anointed by God to be president," Bruge and Djupe told Fox News in an email. 'At least until we examined the evidence that suggested religious and secular elites continue to claim that Trump has a religiously significant role to play.' They added, 'Mainly limited to Republicans, we find dramatic increases in belief in Trump's anointment when their faith is linked to politics. As threats become larger, both real and imagined, the religious significance of the presidency appears to be growing among a wide portion of the population.'Djupe, an affiliated scholar with Public Religion Research Institute, tweeted about the results compared to a similar survey of white Protestants last year. 'There's a big increase in believing Trump is anointed.'" (Citing, Fox News, University professors say more church goers believe Trump is 'anointed by God', By Caleb Parke, May 13, 2020, https://www.foxnews.com/us/trump-2020-university-church-god).

351. On Aug. 21, 2019, Defendant tweeted,

"Thank you to Wayne Allyn Root for the very nice words. "President Trump is the greatest President for Jews and for Israel in the history of the world, not just America, he is the best President for Israel in the history of the world...and the Jewish people in Israel love him..." (CBS NEWS, *Trump tweets quote calling him the "second coming of God" to Jews in Israel*, By Sophie Lewis, AUGUST 21, 2019 / 3:47 PM / CBS NEWS, https://www.cbsnews.com/news/trump-tweets-quote-calling-him-the-second-coming-of-god-to-jews-in-israel/).

352. On Aug, 21, 2019, Defendant continued to tweet,

"....like he's the King of Israel. They love him like he is the second coming of God...But American Jews don't know him or like him. They don't even know what they're doing or saying anymore. It makes no sense! But that's OK, if he keeps doing what he's doing, he's good for...." Id.

353. "The latest tweets come a day after President Trump criticized 'any Jewish people that vote for a Democrat,' saying it 'shows either a total lack of knowledge or great disloyalty." Id.

# H. DEFENDANT MOVED THE US EMBASSY IN ISRAEL TO JERUSALEM FOR A RELIGIOUS GROUP, EVANGELICALS

354. Trump says he Moved the US Embassy to Jerusalem for the Evangelicals. Specifically, at a Trump rally in Oshkosh, Wisconsin Trump stated "We moved the capital of Israel to Jerusalem...That's for the evangelicas."

(See, The Hill, Trump: 'We moved the capital of Israel to Jerusalem. That's for the evangelicals'

Aris Folley 8/18/2020, https://www.msn.com/en-us/news/politics/trump-we-moved-the-capital-of-israel-to-jerusalem-that-s-for-the-evangelicals/ar-BB185cwp).

355. Defendant appeared to base his political decision to support religion, or to gain the support of religious supporters, thereby impermissibly excessively entangling politics and religion in violation of the 1st and 5th Amendments. (See, County of Allegheny v. American Civil Liberties Union Greater..., 492 U.S. 573 (1989); Abrogated by Town of Greece, N.Y. v. Galloway, U.S., (May 5, 2014), the "Constitution mandates that government remain secular, rather than affiliating itself with religious beliefs or institutions, precisely in order to avoid discriminating among citizens on basis of their religious faith.")

- IV. GOVERNMENT SPONSORED PRIVATE PERSECUTION, BUYING LOYALTY BY BARTER OR EXCHANGE, CHURCH DONATIONS FOR A LITTLE SOMETHING DOWN THE LINE SUCH AS BAILOUTS, OR POWER TO PERSUDE POLITICIANS, AT THE COST OF TEACHING SOME PREACHERS TO PERSECUTE LIBERALS LIKE ME, SINCE I DO NOT SUPPORT THOSE WHO SUPPORT THEIR POCKETS OR POLITICAL POWER
- 356. On or about, May 4, 2017, President Trump signed into law Ex. Or. No. 13798, 82 Fed. Reg. 21675. (See, Exhibit 9).
- 357. The President's Executive order allows churches to donate to political campaigns who align their interest with the President's interest.
- 358. I have noticed some preachers teach opposition towards liberals like me, causing economic, social and political persecution based on I believe government sponsored support.
- 359. I have listened to preachers condemn or put down "liberals" when God loves all people, even liberal democrats like me.
- 360. People have accused me of not being a Christian when I told them I am a democrat. They have also said "you can not be a democrat and a Christian too."

- 361. I am a Christian.
- 362. I am a Democrat too.
- 363. I believe strangers learned wrong because Defendant and those he exploits by supporting state sponsored private persecution teach them wrong, misleading them.
- 364. I believe the unholy union of church and state the Defendant magnifies is purposely made to increase government sponsored private religious persecution towards me and others who do not support Defendant's interest, to serve Defendant's political gain.
- 365. Regardless of intent, the result of the unholy union of church and state the Defendant creates is in fact generating government sponsored private religious persecution towards me and others.
- 366. Trump misleads religious people in churches who desire power, worldly influence and money or favors traded more than the true treasure God in the heart's of man.
- 367. Trump's executive order tempts church leaders to go on the path to hell by seeking to gain the world, by bought or bartered for political influence and power, only to lose their soul. (See, Mark 8:36 "What good is it for someone to gain the whole world, yet forfeit their soul?")

- 368. Trump's executive order allows religious institutions to buy or barter loyalty with those who align with Defendant's interests, in exchange for something down the line such as bailouts, or power to persuade politicians, at the cost of teaching some preachers and Christians to persecute liberals like me, since I do not support those who serve their pockets or political power. (See, CBS News, *More than 12,000 Catholic churches in the U.S. applied for PPP loans and 9,000 got them*, By Christina Capatides, MAY 8, 2020 / 12:17 PM,

  https://www.cbsnews.com/news/catholic-churches-paycheck-protection-program-12000-applied-9000-got/); (Also see, the Hill, *Thousands of Catholic churches received PPP loans: report*, By Lauren Vella 05/08/20 11:14 AM, https://thehill.com/homenews/news/496781-thousands-of-us-catholic-churches-received-ppp-loans-amid-coronavirus-report).
- 369. Trump's executive order has had the effect of substantially burdening my religious exercise, and substantially burdens the religious freedoms of others who believe or think differently.
- 370. Defendant cannot demonstrate "the application of the burden to me; "(1) is in furtherance of a compelling governmental interest; and
- (2) is the least restrictive means of furthering that compelling governmental interest." (Citing, 42 USCS § 2000bb-1 (b)(1)(2)).

- 371. Serving the Defendant's own power or profit under the guise of protecting the religious entities' speech is an illusion to cover up corruption that I believe kills the participants in the second death, hell, should they not repent of such inequity.
- V. SUBSTANTIALLY BURDENING PLAINTIFF'S FREE

  EXERERCISE OF RELIGIOUS BELIEF VIA CHILLING HER

  SPEECH BY CREATING THE ILLUSION PLAINTIFF DOES NOT

  KNOW GOD BECAUSE SHE DOES NOT SUPPORT THE

  DEFENDANT
- 372. Many Americans appear to remain under the unholy deception that political loyalty to Defendant, is loyalty to God, and any dissident to Defendant's policies or misbehavior, by me, or those like me, is an attack to their God.
- 373. As a result, I personally received persecution sponsored by the Defendant's illusion that Defendant is not only a political governing authority, but also a Godhead too.
- 374. I do believe in Jesus Christ and I am a Christian, despite the fact others deem me not because I do not support the President's lawless misbehavior.

- 375. My freedom of religion to share the way to eternal life is substantially burdened by Defendant's government sponsored illusion of government combined with God or religious authority to reign ("illusion").
- 376. I believe these attacks against my faith and against my political affiliation based on faith are caused by the Defendant's illusion.
- 377. I recall more than one stranger accusing me of not being a Christian as soon as I criticized the Defendant, chilling my religious belief in sharing God's truth, and thereby, substantially burdening my religious exercise, by preventing me from fully obeying God by spreading the gospel, which includes teaching God's message, about justice, mercy, and love for humanity not exploitation and harm towards humanity to serve greed, even when I do not cite Jesus, God or religion.
- 378. I recall someone saying they heard I eat babies, in response to my opposition supported with biblical references towards Defendant's policies.
- 379. This was painful given the historical context. During the rise of Christianity, people feared Christians. I believe they were taught to fear them by those with money, connections or authority, who exploited the people for money, since Christianity teaches love for humanity and against the oppression, exploitation and indifference towards harming other people to serve greed.

- 380. During the rise of Christianity, people shared false rumors that Christians were baby eaters by twisting the symbolic sharing of bread and wine, "do(ing) this in memory of (Jesus)," which is called communion. (Citing, Luke 22:19, 1 Corinthians 11:24, 1 Corinthians 11:25, relating to "do this in memory of me.")
- 381. I believe Jesus uses communion to teach us, "we do not live by bread alone, but by every word of God." (Citing, Deuteronomy 8:3, Matthew 4:4, Luke 4:4, "We do not live by bread alone but by every word of God.")
- 382. I believe Jesus Christ's words nourish our mind, heart and soul, giving eternal life. "We do not live by bread alone, but by every word of God." Id.
- 383. I believe the word of God gives eternal life by teaching us we are loved and to love.
- 384. I believe the way of love as God teaches, not as the evil world teaches, replacing love with selfish lusts. (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.")
  - 385. I believe God teaches the way to escape the final death.
- 386. I remember exiting the conversation after someone called me a baby eater, while I think I may have noted I am a vegetarian, thereby chilling my

political and religious discussions with a group, substantially burdening my free exercise of religion.

- 387. I also remember posting bible quotes to show my disapproval of Defendant President Trump's decisions on federal legislators facebook comments.
- 388. I remember someone responded "I don't know God" in the comments.
- 389. Instead of continuing in legal debate concerning just laws and just policies, which I believe is what God teaches may be used to save souls from hell while preventing and healing harm done here, I discontinued from participating in the discussion, thereby substantially burdening my religious practice of living the Word of God too by preventing harm and damnation in hell. (See, 2 Corinthians 3:2-3, "You yourselves are our letter, written on our hearts, known and read by everyone. You show that you are a letter from Christ, the result of our ministry, written not with ink but with the Spirit of the living God, not on tablets of stone but on tablets of human hearts.")
- 390. I believe God clearly teaches the difference between unjust decrees that lead people to harm and hell and just laws that prevent harm in this life and the next.

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- 391. Unjust decrees teach love of money, encouraging people to harm one another to serve greed, while rewarding the one who gained the unjust gains.
- 392. Just laws, teach love or concern for humanity. Just laws correct people when they harm, oppress or exploit people to serve business greed.
- 393. I believe just laws have the power to not only save lives, but eternal lives.
- 394. Just laws heal victims of inequity while reducing the temptation for potential wrongdoers to sin by loving money, thereby saving people from hell, since Jesus says you cannot serve God and money.
- 395. Just laws instill hope, never giving up on the parties the Court corrects.
  - 396. Just laws transform wrong doers into right doers.
- 397. I see some of our Constitutional limits on government as just limits, just laws, including the freedom to worship or not according to the dictates of our conscience, not the dictates of the Government through the Government agent the Defendant acting under the cloak of government authority as President of the United States.

- 398. Strangers have told me I cannot be a Christian because I am a democrat to my face too, chilling my religious belief in sharing God's truth, substantially burdening my religion by preventing me from fully obeying God by "spreading the gospel." (See, Mark 13:10, Luke 9:2, 2 Corinthians 8:18, Philippians 1:12, 1 Corinthians 9:16-18, Romans 1:1, Philippians 4:15, Galatians 2:2, Ephesians 6:15.)
- 399. I remember being hurt because I love God, and part of my faith is obeying Jesus by loving others by teaching them the way to escape hell, by teaching them to love others as themselves.
- 400. If people think I do not believe Jesus, they won't accept God's guidance through me by my pointing to the word, including the lessons and reasons behind God's words.
- 401. I believe I am commanded by God to spread the word. Yet, my religious exercise has been substantially burdened under the illusion Defendant created that liberals or democrats like me do not support Jesus. I am so sad.
- 402. I also recall people making jokes that are not funny. My faith is not a joke. I believe Jesus Christ.
- 403. I remember people telling me I was not a real Christian since I am Catholic too.

- 404. I am a real Christian.
- 405. Such comments towards me based on my religious and personal beliefs concerning Defendant has certainly chilled my free exercise of religion in the open.
- 406. I recall, Will Chandler, who I lovingly call the former king of corporate law's son, the former Chancellor's son, and a friend at the gym, citing "Romans" concerning obeying authority when I criticized Defendant's alleged lawless policies, thereby indicating I was misbehaving by not following God by not supporting Defendant.
- 407. I think my friend, Will Chandler, was citing to Romans Chapter 13 relating to obeying government authority. My friend did not grasp that not all laws are weighted the same in the bible.
- 408. Just like the Constitution preempts treaties, executive orders and federal laws which conflict, God's commandments also are preempted by the two greatest commands, Love God foremost and love one another subordinately.
- 409. Also note, Jesus told Pilate that the ones handing you over are guilty of a greater sin, meaning those who handed Jesus Christ over to the Court for prosecution broke a more important law, than Pilate, the judge. (Citing, John 19:11.)

- 410. My friend also did not grasp that just because God allows evil, it doesn't mean God willed evil.
- 411. We all have power to choose to be driven by our evil, loveless, selfish, desires to live for our own, or to choose to lay down our lives by loving God by exercising self control, by considering the impact of our decisions or lack thereof, upon others, even those outside of our own.
- 412. Just because people, like the devil in Job, have the power to do evil and so do evil, does not mean it is God's will that evil is done.
- 413. God affords us the power to choose, by using our brain, our mind for good by love, or evil by absence of love. Please note, I believe people go to hell for confusing lusts for love. Not knowing is not okay but is guilt to God for not caring to use your brain, to think, to care, to love.
- 414. That is why I think Jesus tells us to pray that God's will be done. I know I need guidance by God to understand God's will and humbly praying that we may do his will is nice. (Citing Matthew 10:6, "your kingdom come, your will be done, on earth as it is in heaven.")
- 415. I also recall my friend Will Chandler indicating sin was all women's fault, a different time at the gym. He said it was all Eve's fault.

- 416. Will's statement conflicted with scripture and was sadly supported by Defendant's demeaning words and treatment towards women under the cloak of government authority combined in the unlawful union with the cloak of religion, making him a misbehaving perceived Godhead, misguiding people I love to harm and hell.
- 417. Romans 5:12 provides, "sin entered the world through one man, and death through sin, and in this way death came to all people, because all sinned."
- 418. Scripture did not blame Eve, per my friend's statement and jokes that were not funny because I know he believes it, and teaches others to believe the same.
- 419. I believe people go to hell for thinking evil thoughts. (Matthew 5:22, Jesus said, "anyone who is angry with a brother or sister will be subject to judgment.")
- 420. I believe Defendant is misleading my friend, Will Chandler and his beautiful wife, Leah Chandler to hell, by teaching ugly thinking is Godly, and by failing to correct sinful thinking, by instead encouraging it under the cloak of Godliness and Government authority.
- 421. My beautiful friend, Leah Chandler, who I lovingly called the lovely law librarian is now Judge Leah Chandler of the J.P. Court, Will Chandler's wife.

- 422. She is not allowed to talk about religion or politics now since she became a judge.
- 423. But in private, before she became a judge, she indicated her difficulty in believing in a God who could sacrifice his child or encourage the sacrifice of Abraham's child, Isaac.
- 424. I also believe her husband's misguided beliefs on Christianity due to Defendant's encouragement and mis-leadership turns her away from salvation through God's love, since Will Chandler does not honor his wife or women by blaming Eve and women for sin.
- 425. Defendant does not lay down his will, his desires, to do the will of God by his love for others as himself.
- 426. I believe Defendant models behavior that misleads others to hell as our nation's leader, and as a perceived divine leader.
- 427. Leah Chandler and Will Chandler also declared their support for the Defendant, at least up until the last time I spoke with them.
- 428. I believe the Defendant misbehaves and misguides people I love to hell by modeling misbehavior to hell.

- 429. I believe my loved ones, Leah Chandler and William Chandler will go to hell if they continue to be deceived by the Defendant's encouragement of believing evil is good under the guise of Godliness.
- 430. I notice other loved ones in the community, I think of as Bible boys gone wild, who are deceived by the Defendant, into glorifying business greed, pride, or violence, while claiming to support Defendant and God, despite the fact I believe my God teaches love of money, pride and violence is wrong.
- 431. For instance, I notice my former grade school, schoolmate Sheldon Hudson, a government employee, Town Manager of Millsboro, located in Delaware, glorify business greed, Defendant President Donald Trump and God, thereby contributing to the illusion that supporting business greed and President Trump is Godly.
- 432. I believe my friend, Sheldon Hudson, will go to hell because he is deceived by the Defendant and by those the Defendant deceives into thinking business greed is good and Godly, unless he repents of such evil thinking.
- 433. I believe this court has the power to be not only a life saver, but an eternal life saver by safeguarding separation of church and state so Americans may worship or not according to the dictates of our conscience, not the dictates of the

government, through Defendant as the President of the United States, under the intrinsic persecution his shared support of religious beliefs create.

### **COUNT 1**

## UNLAWFUL ESTABLISHMENT OF GOVERNMENT RELIGION, IN VIOLATION OF THE ESTABLISHMENT CLAUSE OF THE 1st AMENDMENT APPLICABLE TO DEFENDANT VIA THE 5TH

- 434. Plaintiff, Meghan Kelly, repeats and incorporates by reference all of the above paragraphs and all of the below paragraphs, and the Exhibits and citations, the paragraphs refer to herein as admissible under nonhearsay and hearsay exceptions, including but not necessarily limited to, probative fact, state of mind, belief, present sense impression, periodical exception, excited utterance, admission by party opponent, as though set forth herein in the first instance.
- 435. The First Amendment provides in part: "Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof." (emphasis intended)." (U.S. Const. amend. I.)
- 436. The Defendant, acting in his official capacity as the President of the United States, has established the illusion of government sponsored or government backed religion or religious beliefs, by personally creating the appearance of supporting one perceived religious group through a series of collective behavior,

including but not necessarily limited to, the behavior noted herein, creating a "pervasive' degree of government involvement with religious activity in (the) present case," in violation of the Establishment Clause applicable to the Defendant via the 1st and 5th Amendments. (Citing, Lee v. Weisman, 505 U.S. 577 (1992)); (Citing, U.S. Const. amend. I. and V.)

- 437. The Defendant, acting in his official capacity as the President of the United States, also governs through the illusion of religious authority, in an unholy union where religion is publicly used for Defendant's vanity, meaning Defendant's political and personal purpose in violation of the 1st and 5th Amendments, instead of maintaining separation of church and state.
- 438. Defendant, acting in his official capacity as the President of the United States openly accepts perceived or projected combined religious and political support from alleged Christians, creating the appearance that Defendant is not only a political leader, but a religious leader as well, in violation of the Establishment Clause applicable to the Defendant via the 5th Amendment.
- 439. The US Supreme Court held the "Establishment clause, at very least, prohibits government from appearing to take position on questions of religious belief or from making adherence to religion relevant in any way to person's standing in political community." (County of Allegheny v. American Civil

Liberties Union Greater..., 492 U.S. 573 (1989), Abrogated by Town of Greece, N.Y. v. Galloway, U.S., May 5, 2014).

- 440. The Lemons test is not necessarily required under the facts of this Count which applies to laws passed, or government agents executing laws passed which may be unconstitutionally applied or unconstitutional on their face which is distinguished from the present case. (Citing, Lemon v. Kurtzman, 403 U.S. 602, 91 S.Ct. 2105, 29 L.Ed.2d 745.); (Also see Lee v. Weisman, 505 U.S. 577 (1992), where the Supreme Court held, "Reassessment of decision in Lemon v. Kurtzman, which set forth standards for evaluation of establishment clause cases, was not required in order to determine whether "nonsectarian" prayer could be offered at school graduation; "pervasive" degree of government involvement with religious activity in present case, to point of creating state-sponsored and state-directed religious exercise in public school, was sufficient to determine constitutionality without reference to Lemon test. U.S.C.A. Const.Amends. 1, 14.")
- 441. Defendant as the chief executing authority, as the President of the United States, charged with executing laws, lawlessly acts, without foundation for any of his violations in statutory law, albeit, with the possible exception of Ex. Or. No. 13798 of May 4, 2017, 82 Fed. Reg. 21675, and possibly other executive orders that are not the focus of this cause of action.

- 442. Instead, Defendant behaves as a law unto himself.
- 443. Defendant's violations cause ongoing harm to Plaintiff.

### **COUNT II**

PLAINTIFF'S FREE EXERCISE OF RELIGION IN VIOLATION OF 42

USC §§ 2000bb — 2000bb-4, and THE 1st AMENDMENT APPLICABLE TO

DEFENDANT VIA THE 5TH AMENDMENT

- 444. Plaintiff, Meghan Kelly, repeats and incorporates by reference all of the above paragraphs and all of the below paragraphs, and the Exhibits and citations, the paragraphs refer to herein as admissible under nonhearsay and hearsay exceptions, including but not necessarily limited to, probative fact, state of mind, belief, present sense impression, periodical exception, excited utterance, admission by party opponent, as though set forth herein in the first instance.
- 445. Many Americans appear to remain under the unholy deception that political loyalty to Defendant, is loyalty to God, and any dissident to Defendant's policies or misbehavior, by me, or those like me, is an attack to their God.
- 446. I personally face persecution sponsored by the Defendant's illusion that Defendant is not only a political governing authority, but also a Godhead too, for exercising my free exercise of religion.

- 447. I also receive eternal harm because I believe those deceived by the Defendant's illusion of religious governing authority will not receive eternal life in heaven.
- 448. Every day, the Defendant exploits and encourages the illusion of religious governing authority by supporting one perceived religious belief, or suppressing different religious beliefs, my freedom to exercise my faith is substantially burdened by threat of persecution by private citizens who believe supporting Defendant supports God.
- 449. Every day, the Defendant exploits and encourages the illusion of religious governing authority by supporting one perceived religious belief or suppressing different religious beliefs, my freedom to exercise my faith is substantially burdened by threat of persecution by private citizens who believe supporting my God and my religion is evil since the Defendant's support of the Bible and God makes it appear Christians misbehave like the Defendant.
- 450. My free exercise of religion by seeking to feel a fuller type of love in heaven with those the Defendant misleads and deceives to damnation is substantially burdened by Defendant's excessive entanglement of religion with government in violation of the 1st Amendment applicable to the Defendant via the 5th Amendment and in violation of 42 USC §§ 2000bb 2000bb-4.

- 451. My free exercise of religion to spread the word without government sponsored private bought or bartered for private persecution is substantially burdened and chilled.
- 452. The Defendant sells deception, lies, as truth, I believe misleading many to harm and hell, as they accept the illusion in place of truth.
- 453. Infringement of First Amendment rights are generally not compensable by money damages and are, therefore considered irreparable, as freedoms.
- 454. The harm noted herein, such as the suppression of my freedom to worship or not according to the dictates of my conscience without government sponsored persecution is certainly irreparable.
- 455. Given the fundamental rights at issue here, and the requirement that the Defendant must prove his violations are "in furtherance of a compelling governmental interest; and the least restrictive means of furthering that compelling governmental interest," somehow more important than Plaintiff's freedom to freely exercise her religion without government sponsored persecution, I have a high likelihood of success on the merits of my claim. 42 USCS § 2000bb-1(b)(1)(2).
  - 456. Defendant's violations cause ongoing harm to Plaintiff.

### **COUNT III**

# ESTABLISHMENT CLAUSE VIOLATION OF THE 1st AMENDMENT APPLICABLE TO DEFENDANT VIA THE 5TH AMENDMENT RELATING TO THE EXECUTIVE ORDER 13798 of May 4, 2017, 82 Fed. Reg. 21675

- 457. Plaintiff, Meghan Kelly, repeats and incorporates by reference all of the above paragraphs and all of the below paragraphs, and the Exhibits and citations, the paragraphs refer to herein as admissible under nonhearsay and hearsay exceptions, including but not necessarily limited to, probative fact, state of mind, belief, present sense impression, periodical exception, excited utterance, admission by party opponent, as though set forth herein in the first instance.
- 458. Defendant passed executive order 13798 of May 4, 2017, 82 Fed.

  Reg. 21675 (herein also referred to "executive order"), allowing religious entities to donate to political campaigns without losing their tax free status.
- 459. Defendant's executive order allows religious groups to buy favors or loyalty through donations to those in power or those seeking government power.
- 460. Buying power or bartering for power by granting churches the ability to donate to politicians and political groups, with money or donations parishioners gave churches or religious entities, to seek the churches' self gain, material gain,

loyalty or favors, instead of religious gain, is not freedom. It is for sale. It is not free speech, but is bought speech.

- 461. The cost of permitting payments via donations or support to politicians by religious organizations via the executive order is suppressing my Constitutionally protected freedom to worship or not according to the dictates of my conscience, not the dictates of government backed religious organizations, under threat of government sponsored private persecution or actual government persecution.
- 462. The cost of selling religious organizations power and influence through the executive order is essentially allowing the Defendant to sell what is not his, the freedoms of Americans from enslavement to the governing class's religious dictates under the threat of government backed persecution.
- 463. Churches and religious entities who donate to politicians or political groups, reasonably perceive the politicians or political groups owe the entities a benefit, such as loyalty to certain ideas.
- 464. The executive order creates a bought or bartered for religious interest in religious organizations supporting politicians.

- 465. As a result, some members of religious groups have taught parishioners to persecute those who do not align with the religious group's political interests, as not a genuine Christian.
- 466. The executive order creates a bought or bartered for political interest in political organizations supporting religious groups.
- 467. Churches and religious entities who donate are tempted to be biased and loyal to those they support because they reasonably perceive such politicians or political groups as owing the religious entities a benefit, such as loyalty to certain ideas.
- 468. As a result of this inherent bias or loyalty of religious organizations to serve those who serve them thereby serving themselves, (which I believe reflects the image of Satan), members of religious groups have taught parishioners to persecute those who do not align with the religious group's political interests, distinguished from religious interests, as not a genuine Christian.
- 469. I have faced increased government sponsored private persecution as a liberal Christian as a result of the implementation of the executive order.
- 470. My free exercise has been in effect substantially burdened by the application of the executive order.

- 471. What constitutes an "establishment of religion" is often governed under the three-part test set forth by the U.S. Supreme Court in Lemon v. Kurtzman, 403 U.S. 602 (1971). Under the "Lemon" test, government can assist religion only if (1) the primary purpose of the assistance is secular, (2) the assistance must neither promote nor inhibit religion, and (3) there is no excessive entanglement between church and state.
- 472. Here, the primary purpose of the executive order is not free speech, but bought or bartered for religious political speech used to influence elections via campaign donations or support.
- 473. The alleged secular speech cannot be divided from the unholy union tempting religious groups to seek their own power and profit in place of a true religious purpose, in exchange for donating or supporting the candidates who have the power to grant them their desires.
- 474. The executive order is using religion and religious groups for politician's vanity, meaning political purpose, creating an unnatural religious loyalty to party and people within a party by the religious groups who barter or buy loyalty, through donations or support.

- 475. The executive order has the impact of promoting religions which align with political beliefs and inhibiting religions who do not align with such political beliefs.
- 476. The executive order encourages and exacerbates excessive entanglement between church and state.
- 477. I believe the executive order not only violates the establishment clause of the first amendment applicable to Defendant via the 5th and 42 USC §§ 2000bb 2000bb-4, but it also tempts Christians and churches to sin against God by using God's name in vain, for man's purpose in place of God's will, misleading many to harm and hell.
- 478. Defendant has promoted a religion, a type of Christianity, that I believe does not align with God's teachings.
- 452. Defendant has facilitated bail outs to religious entities or churches with business bail out money, which creates an unnatural religious whored loyalty to Defendant in exchange for the hope of future donations to Defendant, or members of the Defendant's party, the Republican party with the expectation that churches are taken care of with profit and power which is wrong because it compromises politician's focus on caring for the people they are charged to serve, instead of

those who take care of the politicians, those who donate or support their campaigns.

479. Defendant's violations cause ongoing harm to Plaintiff.

### PRAYER FOR RELIEF

WHEREFORE, Meghan Kelly respectfully requests that this Honorable Court:

- 1. Enter an Order permanently enjoining and restraining the Defendant from forcing religious views or sponsoring religion, while employed as the President of the United States, so as not to substantially burden Plaintiff's free exercise of religion.
- 2. Enter an Order permanently enjoining and restraining the Defendant, the President of the United States, from persecuting those with diverse religious beliefs, based on such perceived religious beliefs, while acting as the President of the United States.
- 3. Enter an Order the Defendant shall award Plaintiff costs to the extent authorized by law or Court rule, and other such relief as the Court deems proper and just, if applicable.
- 4. Grant any injunctive or other relief that this Court deems just, equitable, and proper.

### A-4

### IN THE SUPREME COURT OF THE STATE OF DELAWARE

Meghan Kelly,	)	
Plaintiff Below,	)	No. 119, 2021
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	of )	
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. Cubbage, 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 BJs, 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.
- 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>

- 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.

<sup>&</sup>lt;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 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.

- 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.
- 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

## EXHIBITS THERETO

### EXHIBIT 55

December 1, 2020

Court of Chancery Courthouse 34 The Circle Georgetown, DE 19947

RE: Meghan Kelly v. the President Donald Trump, et. Al. Case No. 2020-0809- Master PWG

**Due Process concerns** 

Dear Honorable Master Patricia W. Griffin:

I believe I may have received disparate treatment based on my wealth, political affiliation and or religious orientation, and will continue to receive such treatment without your assistance.

The staff in your court appear to be subverting my case, by serving as advocates for President Trump.

I sensed this early on when I was having trouble gaining a copy of everything, pursuant to your kind order granting me one copy. I felt like my case was not treated as a serious matter.

I sensed this when I when I felt mistreated by your staff around

October 12, and October 13, and went home crying for days. See Exhibit A,

emails, admissible under the present sense exception.

1

I filed the letter dated October 19, 2020, regarding the fact I am not an officer in this court to address and qualify my position as the party, not a mere attorney in hopes to prevent future abuse.

I am without the insulation or protection of counsel. I am the party.

The staff may more freely scold and criticize attorneys without display of improper partiality towards a party.

I sensed this when Arline Simmons misled me concerning your November 2, 2020 as something trivial on November 4, not November 2 as indicated in my letter dated to this Honorable Court dated November 6, 2020, apparently, in hopes I would not seek exception to your rulings.

Then, I realized the court's staff may be scared of messing up with regards to paper filing, and the unique Covid19 amendments the requirements. I believe the Supreme Court is merciful concerning trite matters such as the fact none of us appeared to be aware of the waiver of notary requirements. I applaud the Supreme Court's leadership in safeguarding people's lives more than safeguarding business as usual.

Yet, my suspicions of partiality towards me proved correct. On December 1, 2020, your staff appeared to be attempting to bleed me dry of resources to continue this proceeding by denying me the benefits of the Chancery Court Rule 171 (c)'s authorization which provides in part. "...1

copy of all briefs shall be mailed to <u>or filed</u> with the Register who shall immediately docket them and mail or deliver the original to the Judge to whom the matter has been assigned..." (emphasis intended).

The court's staff appears to be playing the advocate to win the case for President Trump by directing me to mail everything to the Court in Wilmington or pay for gas to drive two hours away despite the fact she is aware of my limited resources. See Exhibit B.

I should not be additionally taxed by unnecessary costs because the court's staff opposes my position.

This case will likely remain alive, with possible interpleading by churches who care more about money than humanity. Under the guise of freedom of religion some churches will foreseeably display whoredom, selling my God for a price too high, costing lives and health to serve their bottom line. An order requiring, I mail everything to upper Delaware is unjust, based on bad faith of the court's staff, intentionally causing me to withdraw my case due by running out my limited funds in mailing costs.

The Court's agents cannot act as the Defendant's advocate by indicating I am not worthy of a fair and impartial case because of poverty that inconveniences the Court, political orientation or political beliefs.

I understand, most people support President Trump down here, and that most people do not think or believe as I do. Yet, I still have the freedom to pursue my unpopular belief, and my desire "not to be conformed to the world," without government persecution or threat of persecution. Romans 12:2.

I have chosen to confront the most powerful man in the world with endless resources paid by the federal government. That fact does not make my case trivial.

I believe "God chose the foolish things of the world (like me) to shame the wise; God chose the weak things (like me) of the world to shame the strong." 1 Corinthians 1:27.

Part of what makes this country already great is the impartiality required by the courts, creating an equalizer in fairness, regardless of wealth or poverty, power, position, race, religion, affiliation or place of origin.

Justice is not guaranteed. Yet the opportunity for justice, even by a peon like me against the most powerful man in the world, is. Should I fail, that is on me, not the court. This Honorable Court must allow me to try.

I believe the staff's behavior is not a reflection on the Court, nor a reflection on you, Honorable Master Patricia W. Griffin. They add a buffer between me and you to prevent ex parte communications.

Yet, the buffer has broken to the point that the floods of injustice may arise without the protection of the court's guidance on its own staff to uphold the integrity of the law.

"To be actionable, claim of denial of access to courts need not allege total or complete denial of access; rather, plaintiffs need only claim that interference with and potential prejudice to right of access to redress in state court rises to level of constitutional deprivation." In re Cincinnati Radiation Litig., 874 F. Supp. 796 (S.D. Ohio 1995).

"Opportunity to be heard is essential requisite of due process of law in judicial proceedings." Richards v. Jefferson Cty., Ala., 517 U.S. 793, 116 S. Ct. 1761, 135 L. Ed. 2d 76 (1996).

Please assure me the protection of due process, without rendering an order displaying partiality to the opposing side, to prevent infringement upon my right of due process in this case.

Respectfully Submitted,

Meghan Kelly, Esquire

Pro Se

34012 Shawnee Drive Dagsboro, DE 19939

(Word Count 993)

# Exhibit A

#### Re: Thursday afternoon/Meg/3 Original summons/

meghankellyesq@.../Inbox

Oct 14 at 9:20 AM



Meg Kelly <meghankellyesq@yahoo.com> To: Kruger, Katrina (Courts) <katrina.kruger@delaware.gov>, Simmons, Arline (Courts) <arline.simmons@delaware.gov> Cc: Meg Kelly <meghankellyesq@yahoo.com>

Hi Arline.

Thank you for responding so quickly. Will do, If anything comes up I will let you know.

Arline, Thank you for holding off on the summons from Friday October 9, 2020 for the civil processor. I did not want you to do it twice with the incorrect amount of days the Defendant has to respond. I explained to the Honorable Court, the Defendants are allowed 60 days instead of 20 in the documents I filed. I alerted the Honorable Master to this in the filings.

Accordingly, I am missing three summonses for the Second Amended Complaint, and one summonses and copy of the praecipe for all three Defendants. They have 60 days to respond. I do not believe the Honorable Master Patricia W. Griffin can not make a determination on anything until all three Defendants are served.

I will draft more detailed certificates of service. So Katrina knows what links up with what.

Thank you for letting me know, you need more specificity Katrina.

I did not sleep at all last night (and I always sleep well) and cried this morning after yesterday and Monday too. I would not have filed this case if I thought things would be ok, I do not. I am seeking to expedite this case because I believe people are deceived by the Defendant to be harmed and damned to hell. I am still crying. I thank you for your hard work on this case. It is worth the effort, even if you do not believe I am worth it. I am Katrina. I love and respect you in real life but was so saddened by the way you demeaned me as an inconvenience. I am entitled to a fair impartial opportunity to be heard under the law, despite the required work for the Honorable Court to listen to my words. Justice is not to be earned, bought or bartered for by those with money. It must be granted to the rich and poor alike without bias towards those with money. Otherwise it is injustice guaranteed.

I aim still crying. I might need a day to collect myself and refocus my attention on the case at hand. I intend to come in tomorrow morning. I will let you know if I can not make it.

I will draft a more detailed certificate of service for the 3 summonses I will file. So, you know what goes with what.

Thank you.

Love.

Meg

On Wednesday, October 14, 2020, 08:11:11 AM EDT, Simmons, Arline (Courts) <arline.simmons@delawere.gov> wrote:

Hello Meg.

Please come on THURSDAY before 11:00 a.m.

---Original Message

From: Meg Kelly <meghankellyesq@yahoo.com>

Sent: Tuesday, October 13, 2020 6:46 PM

To: Kruger, Katrina (Courts) < Katrina Kruger@delaware.gov>; Kruger, Katrina (Courts) < Katrina Kruger@delaware.gov>

Cc: Simmons, Arline (Courts) < Arline Simmons@delaware.gov>

Subject: Thursday afternoon/Meg

Hi Katrina and Arline.

I have a CLE scheduled on Friday. May I please come in Thursday afternoon.

Thank you,

Meg

#### RE: Monday Meg Kelly meghankellyesq@.../Inbox



Simmons, Arline (Courts) <ariine.simmons@delaware.gov>

To: 'Meg Kelly' <meghankellyesq@yahoo.com>, Kruger, Katrina (Courts) <katrina.kruger@delaware.gov>

Oct 14 at 3:52 PM

Monday is fine-Can you come before 11:00 a.m.?

----Original Message-----From: Meg Keily <meghankellyesq@yahoo.com> Sent: Wednesday, October 14, 2020 3:41 PM

To: Simmons, Arline (Courts) < Arline, Simmons, @delaware,gov >; Kruger, Katrina (Courts) < Katrina, Kruger, @delaware,gov >; Kruger, Katrina (Courts)

< Katrina Kruger@delaware.gov>

Cc: Meg Kelly < meghankeliyesq@yahoc.com>

Subject: Monday Meg Kelly

Hello,

May I please come in Monday instead? I am still shaken up. Remember I am behaving as the inured party, not bringing this complaint as an advocate with the insulation of representation.

I think a couple days, may help Attorney General William Barr, Esq. and President Trump too recover from Covid19 too. The Honorable Master can not rule on anything until all 3 Defendants are served to afford notice, or at least attempted notice to all parties. Attorney General William Barr and the US Attorney General agent, the civil process clerk, are deemed the United States, a necessary party according to the rules of Federal procedure Rule 12 3(A).

Arline is wiser than I. She kindly indicated "do you need the United States as a party. I did not know until I looked it up." I am sorry that required I had to amend the complaint. I tend to look things up to confirm, but now I no longer have the ability to easily look things up. Arline thank you for your kindness and mercy.

Thank you. Meg

#### Meg/Sorry Katrina/Meg is not an attorney advocate in this case

meghankellyesq@.../Sent



Meg Kelly <meghankellyesq@yahoo.com>
To: katrina.kruger@delaware.gov, katrina.kruger@delaware.gov
CC: Simmons Arline (Courts) <arline.simmons@delaware.gov>,
Meg Kelly <meghankellyesq@yahoo.com>

Oct 15 at 12:20 PM

Helic.

I do not know I do this, but I have been told I raise my voice when I am upset and passionate. I do not notice it. I apologize Katrina.

When Katrina said I was not allowed to file anything, though I must or it will be kicked out, she behaved like Defendant's advocate, not as an impartial government agent.

When Katrina said I needed a phone when the rules afford leeway for those without a working phone, it made me feel as if you represented Defendant's interest and the Co urt's convenience over truth and justice.

You made me feel less than, when you said I should let someone ahead of me on Monday, when I am trying to expedite this case for immediate relief.

The Court's agents cannot act as the Defendant's advocate by indicating I am not worthy of a fair and impartial case because of powerty that inconveniences the Court, political orientation, or religious beliefs.

I understand, most people support President Trump down here, and that most people do not think or believe as I do. Yet I still have the freedom to pursue my belief, and my desire "not to be conformed to the world," without government persecution or threat of government persecution.

I am sorry I need to clean my dirty heart of the sin of fear. It appears I am raising my voice with other people when I talk about pursuing an action to safeguard freedom to worship or not according to the dictates of our conscience, not the dictates of the government, under the threat of government sponsored public or private persecution.

I am not an attorney advocate in this case. I am without the insulation and protection of counsel. I am a pro se litigant. I am the party and not the party's counsel. If I was a mere attorney, an officer of the Court, as opposed as the party, it would be different.

Thank you for understanding. I will work on cleaning my dirty heart of sin. I am sorry Katrina. I am having a real hard time with my wimpy high voice. I need to become brave, and have faith in pursuit of justice in the courts. I have never been so scared in my entire life. I am scared of letting God down, and this Honorable Court down. It is h umbling. I have chosen to confront the most powerful man in the world with endless resources paid by the federal government. Yet "...God has chosen the weak things of the world to shame the things which are strong." 1 Corinthians 1:27

I apologize in advance for not having easy access to the law too.

Thank you. Have a good weekend.

Kind regards, Meg

Meg

# Exhibit B

## Fw: Meg v Trump Case 2020-0809 -PWG/letter Requesting permission to exceed the Rule 171(f) word limit

From: Meg Kelly (meghankellyesq@yahoo.com)

katrina.kruger@delaware.gov; arline.simmons@delaware.gov; meghankellyesq@yahoo.com To:

Date: Monday, November 30, 2020, 01:29 PM EST

Hi Katrina.

May I please drop them off to your court as the rules allow? The cost of continuously mailing verses dropping off are prohibitive. It is stressing me out, and I am already at risk of a heart attack. My blood pressure is higher than expected. I didn't know my heart was hurting because my blood pressure is high, 138 over 87, most recently. That is why my heart hurts when people say I am not a Christian. It upsets me to the point it may eventually kill me.

Thank you, Meg

---- Forwarded Message ---

From: Meg Kelly <meghankellyesq@yahoo.com>

To: Kruger, Katrina (Courts) <katrina.kruger@delaware.gov>; Simmons, Arline (Courts)

<artine.simmons@delaware.gov>; McKinnon, Brenda (Courts) <br/>brenda.mckinnon@delaware.gov>; Boyer, Sheila (Courts) <sheila.boyer@delaware.gov>

Cc: Bauer, Cecelia (Courts) <cecelia.bauer@delaware.gov>; Meg Kelly <meghankellyesq@yahoo.com>

Sent: Monday, November 30, 2020, 01:14:02 PM EST

Subject: Re: Meg v Trump Case 2020-0809 -PWG/letter Requesting permission to exceed the Rule 171(f) word limit

Hi Katrina and Sheila.

Since I have very little money to mail, it is more plausible for me to adhere to the rules by dropping it off to Sussex County. Thereby, I seek the benefits of the rules, without waiving them.

Thank you for your suggestion, and understanding.

Have a good day.

Very truly. Meg

On Monday, November 30, 2020, 12:57:56 PM EST, Boyer, Sheila (Courts) < sheila.boyer@delaware.gov> wrote:

Thank you, Katrina -

You have detailed everything perfectly. Since Vice Chancellor Fioravanti is assigned to this case to hear the Exceptions to Master's Report part of this case, anything having to do with those documents, or correspondence to Vice Chancellor Fioravanti, need only be sent to his Case Manager, Brenda McKinnon - and/or to the Register in Chancery in Wilmington - mailing address is shown below with my signature block.

Sheila

Sheila L. Boyer

Judicial Case Management Supervisor

Register in Chancery Wilmington

500 N. King Street, Suite 11600

Wilmington, DE 19801

302-255-0552

From: Kruger, Katrina (Courts) <Katrina.Kruger@delaware.gov>

Sent: Monday, November 30, 2020 12:48 PM

To: Meg Kelly <meghankellyesq@yahoo.com>; Simmons, Arline (Courts) <Arline.Simmons@delaware.gov>;

McKinnon, Brenda (Courts) < Brenda. McKinnon@delaware.gov>; Boyer, Sheila (Courts)

<Sheila.Boyer@delaware.gov>

Cc: Bauer, Cecelia (Courts) < Cecelia. Bauer@delaware.gov>

Subject: RE: Meg v Trump Case 2020-0809 -PWG/letter Requesting permission to exceed the Rule 171(f) word limit

Hi Meg.

Just to make sure I got this correct. I received the Letter to Vice Chancellor Fioravanti asking to exceed the word count and also the certificate of service in today's mail. According to your email below, you also sent BOTH documents to the Register's Office in New Castle County. Is that correct? I am including in this email Brenda McKinnon, the case manager to the Vice Chancellor, and also Sheila Boyer, office manager, in the event that Brenda is out of the office. There is no need for both counties to docket the same thing. It currently is not on the docket. I will go ahead and efile both documents. ALSO, you need to wait and see how the judge rules before mailing the brief for anyone to efile.

From this point forward, it is best to send the filings to just one office. Since this is now assigned to a judge in New Castle County, mail the documents upstate and bypass the Sussex County office altogether. Otherwise it gets too confusing. If Brenda or Sheila feel differently, they will advise in this email chain.

Thanks.

Katrina

From: Meg Kelly < meghankellyesq@yahoo.com> Sent: Monday, November 30, 2020 12:15 PM

To: Simmons, Arline (Courts) < Arline.Simmons@delaware.gov>; Kruger, Katrina (Courts)

A STATE OF THE PROPERTY OF THE	
< <u>Katrina, Kruger@delaware.gov</u> > <b>Subject:</b> Meg v Trump Case 2020-0809 -PWG/letter Requesting permission to exceed the Rule 17	1(f) word limit
Good morning,	
I hope you are safe and well.	
I wanted to give you a head's up. On Friday, I mailed the attached letter requesting permission to Chancery Court Rule 171(f) Rule word limit for briefs and the related certificate of service to Defer	exceed the idant Barr.
Could you please confirm receipt, once it is docketed?	
I see in under Rule 171(c) that I merely have to drop off the brief to the Court, and the Court will multiple time. I am learning it is unusual for you too. I really apply time and assistance even more. Thank you.	ail it to the reciate your
I actually mailed the letter and the certificate of receipt to the upper Delaware Court and your court may not have to mail what I sent if he confirms receipt or dockets it first. Sorry for mailing it to both	too. So, you courts.
Thank you. Have a great day.	
Very truly,	
Meg	

#### October 19, 2020

Court of Chancery Courthouse 34 The Circle Georgetown, DE 19947

RE: Meghan Kelly v. United States, President of the United States, Defendant, Donald Trump, a.k.a. Donald J. Trump, a.k.a. President Trump, a.k.a. President Donald Trump, his official capacity as President of the United States, No. 2020-0809- Master PWG Plaintiff Not officer of the Court/Economic Crash/Forum

## Dear Honorable Master Griffin:

Thank you for taking the case.

I am not an attorney advocate in this case. I am without the insulation and protection of counsel. I am a pro se litigant. I am the party, not the party's counsel. If I was a mere attorney, an officer of the Court, as opposed to the party, it would be different. Lawyers are permitted to talk to judges, but not on matters relating to matters, ex parte. I am not allowed to talk to you ex parte period.

The court's staff adds a buffer, and are not the Judge on the case.

It is strange for the staff, and for me. For instance, I could not share the rules that required 60 day notice instead of 20 days notice to the staff ex parte to give to you, even though I had them in my hand, and the staff kindly said she could take them.

Instead, I must communicate with the defense counsel simultaneously, electronically, or by mail while speaking directly to this honorable Court.

I do not know whether this case will remain in this Court or be removed to federal Court. This area heavily supports President Trump. One of Defendant's biggest campaign contributors allegedly lives in Sussex, and Delaware's liason for President Trump, Rob Arlett, lives in Sussex.

Although I am cognizant of the pro Trump atmosphere in this county,

I have faith in the fair impartial rule of law by this Honorable Court.

The federal courts are more of a concern for me. The President's sister presided as a judge in the Third Circuit until recently. In addition, the President placed two Third Circuit judges on his list of potential nominees for Supreme Court, creating a concern that the federal judges may be biased toward their colleagues' potential nominations at the death of the next Supreme Court justice, Justice Hardiman and Justice Phipps.

I believe this Honorable Court, from the smallest state, has more power to save the country than the Supreme Court.

This is the corporate capital of the globe.

The biggest government expense globally is healthcare. (See the web site cited in Second Amended Complaint ("SAC"), Count 234). The US spends more money on social security and healthcare than any other sector.

That fact is often hidden by discretionary charts, instead of mandatory spending charts. The US now must pay out more.

The country and the globe have the biggest bill in the history of the world that has fallen due, healthcare and retirement for the baby boomers. Those who value money more than humanity are seeking to get out of paying this earned and owed debt, by bad business. Bad business, made to fail, made to bail out or bankrupt as directors continue to collect hefty salaries and potential bonuses, should not be rewarded by the government for the profit of the few at the expense of the many. (See, SAC, Counts 229-286)

Directors have the power to artificially inflate stocks through stock buy backs. Entities may resell worthless debt in bankruptcy remote entities into infinity while creating the illusion the economy is above water. I used to draft these bankruptcy remote entities at RLF, Delaware's largest homegrown corporate law firm.

With regard to business bailouts and business incentives, creating artificial debt and charging interest to give to businesses to enslave the people to desperate conditions to require the people pay debt back is the sin of inequity and oppression, arguably violating the 13<sup>th</sup> Amendment by creating wage slaves, or forced volunteering.

Creating jobs is not helping the people. (See, Romans 4:4. "Now to the one who works, wages are not credited as a gift but as an obligation.")

Creating jobs is not a gift.

It is exploiting the people to serve those who already profited at their expense with bail outs and incentives, under the deception of doing people a favor by employment.

Soon we will see entities exploit people in a different way only to gain praise by those they oppress, by the elimination of welfare such as social security and medicare, and replacing it with charity violating Matthew 6 misleading people to hell.

This Honorable Court is the only Court in the world that can prevent a global economic crash, while saving government pensions, retirement, social security, lives' savings and Medicare by cutting through the corporate veil of entities to hold those people, directors or otherwise, responsible for made to fail, made to profit from, bad business.

Misleaders and deceivers exacerbate desperate conditions to exploit those they are charged to serve for self-gain. Leaders look after those they serve by alleviating desperate conditions.

This Court is the king of corporate law. Now we need this Court to be a servant leader by slicing the ill gained fat of a few to save the many.

Years ago, I negotiated for a really cool lawyer tool either from Westlaw or Lexis that gave me people and entity's information, including people's social security numbers, except the last two, which is scary because you could go upstairs in the Superior Court and get the last two numbers for Defendants.

The source provided relationships with other people and entities, including entity information in other countries relating to entities here.

Lawyers now have the means to cut through entity shells. The Court is powerless to save the world if lawyers do not have the courage to ask.

I am grateful for the opportunity to be heard.

Please find additional hearing exhibits, to include with the exhibits to the complaint, and a filing list.

Thank you,

Meghan Kelly

Pro Se

34012 Shawnee Drive Dagsboro, DE 19939

(Words 1000)

#### SOLACE and LAC

From: Carol Waldhauser (cwaldhauser@de-lap.org) To: meghankellyesq@yahoo.com Cc: emkiesel@aol.com Date: Monday, May 24, 2021, 11:58 AM EDT Meghan: Please find attached a self-explanatory letter. Please contact us within the next 10 days regarding it. Thank you. Carol Carol P. Waldhauser, Executive Director The Delaware Lawyers Assistance Program (DE-LAP) 405 N. King Street, Suite 100B Wilmington, DE 19801 (302) 777-0124 Cell: (410) 409-8874 cwaldhauser@de-lap.org www.de-lap.org DE-LAP is a Confidential, Free, Non-Judgmental Service Just for Delaware Lawyers and Judges CHECK IT OUT ON YOUR PHONE, TABLET OR COMPUTER, DE-LAP'S NEW WEBSITE AT SAME ADDRESS: WWW.DE-LAP.ORG

FREE, CONFIDENTIAL AND NON-JUDGMENTAL, DE-LAP has assisted the Delaware Bar with quality of life and quality of professionalism issues. We Do Together What Need Not Be Done Alone!

#### -Carol P. Waldhauser, Executive Director

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Carol P. Waldhauser, Executive Director The Renaissance Centre 405 N. King Street, Suite 100 B Wilmington, Delaware 19801 www.de-lap.rog Private: (302) 777-0124 Toll Free: 877-243-3527 Fax: (302) 658-5212 cwaldhauser@de-lap.org

MAY 24, 2021

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

Dear Meghan:

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

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

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

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

Very truly yours,

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

tarol Waldhauser, Executive Director, Lawyers Assistance Program (DE-LAP)

Electronically forwarded with encls: meghankellyesq@yahoo.com

# A-5

## IN THE SUPREME COURT OF THE STATE OF DELAWARE

Meghan Kelly,	)
Plaintiff Below,	) No. 119, 2021
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	f)
	)
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>1</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 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 unharden 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 13th 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 13th 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 you 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. 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.

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

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 noteable, about 33 billion has been misused for years via NIH for bad healthcare that cares less about patients' health and more about entities' wealth.

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.

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.

- 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.

- I must correct my allegation at Motion at 25. I was blinded by my 19. 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

# EXHIBITS THERETO

# Transaction Receipt from Delaware Supreme Court Attorney Registration for \$353.00 (USD)

From: Auto-Receipt (noreply@mail.authorize.net)

Meghankellyesq@yahoo.com To:

Date: Saturday, February 6, 2021, 01:38 PM EST

Oeder Infurmetisch

Annual Registration [e7f2e41f-a6bd-4e7b-bfab-9d5f3858b75f] Description:

**Billing Information** 

**Shipping Information** 

Meghan Kelly 19939

Meghankellyesq@yahoo.com

Total: \$353.00 (USD)

Payment information

Date/Time:

6-Feb-2021 10:38:16 PST

Transaction ID:

62839723216

Payment Method:

Visa xxxx9775

Transaction Type:

Purchase

Auth Code:

748294

Meronant Contact Information

Delaware Supreme Court Attorney Registration Wilmington, DE 19801

teros@doelegal.com

# Re: Nick of time response/Glad your kid is okRe: Your kid/meg worried

From: Meg Kelly (meghankellyesq@yahoo.com)

To: mvavala@dsba.org

Date: Thursday, May 27, 2021, 02:19 PM EDT

Thank you Mark.

Please remain uninvolved, as I might have to seek further action, and state agents may get in trouble. Please remain uninvolved, even with your child.

I am grateful, she has her job.

This is a serious matter.

Very truly, Meg

On Thursday, May 27, 2021, 01:24:20 PM EDT, Mark Vavala <a href="mailto:mvavala@dsba.org">mvavala@dsba.org</a> wrote:

Meg, I won't be involved in whatever transpires. As for my knowing your situation, there have been at least five other members who have approached me since COVID who needed assistance in some form and were in financial difficulties. I didn't refer anyone who contacted me to either ODC or DE-LAP, so I really don't know anything more.

Again, you will remain in my prayers.

Mark

#### Mark S. Vavala, Esq.,

**Executive Director,** 

**Delaware State Bar Association** 

405 N. King Street, Suite 100

Wilmington, DE 19801

(302) 658-5279 (office)

(302) 658-5212 (fax)



www.dsba.org

From: Meg Kelly <meghankellyesg@yahoo.com>

Sent: Thursday, May 27, 2021 1:12 PM To: Mark Vavala < MVavala@dsba.org>

Subject: Re: Nick of time response/Glad your kid is okRe: Your kid/meg worried

Mark

You are the only one in the world, other than the Supreme Court who knew of my waiver. I am disappointed. I sought relief from the Delaware Supreme Court to make both the ODC and DE-Lapp desist. Please refrain from participating further. It is in the Supreme Court's hands now, whether my order will be granted or denied.

Thank you,

Meg

On Thursday, May 27, 2021, 12:10:15 PM EDT, Mark Vavala < mvavala@dsba.org > wrote:

Hi Meg. I don't know what you are referring to. I didn't submit your name to any ODC/DE-LAP matter at all. My correspondences with you have always been cordial. I saw the letter you sent as a copy in your last email and that was the first time I saw DE-LAP had contacted you. Carol and I have a good working relationship and I respect all she does to help out attorneys, but she keeps her matters confidential from me. If it is something else I did, please let me know as I take seriously any accusation that I threw someone under the bus. I know how hard you work and how passionate you are about your issues.

That being said, if DE-LAP reaches out, then someone did suggest you needed help and I encourage everyone to go that route rather than having ODC get your case. Carol is confidential and has helped a lot of attorneys...not just those who need help, but those who have been referred unnecessarily and having her in your corner is great. She works tirelessly to make sure that people don't run into trouble.

Again, though, I see that as your personal right to make that choice.

Please take care.

### Mark S. Vavala, Esq.,

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www.dsba.org

From: Meg Kelly <meghankellyesq@yahoo.com>

Sent: Thursday, May 27, 2021 8:34 AM

To: Mark Vavala < MVavala@dsba.org>; Meg Kelly < meghankellyesq@yahoo.com> Subject: Fw: Nick of time response/Glad your kid is okRe: Your kid/meg worried

Mark,

Maybe you threw me under the bus for self interest because I asked for help in the past? I am disappointed.

Please do better by refraining from participating in burdening my first amendment freedoms in my suit, my free exercise of religious beliefs, freedom of conscience from substantial burden by persecution by the forced will of the state through its arms to serve money and material gain, not good by love and respect for humanity, instead exploitation to serve self interest by the mere fact I choose to live God's will

Thank you, Meg

---- Forwarded Message -----

From: Meg Kelly < meghankellyesq@yahoo.com>

To: Mark Vavala < mvavala@dsba.org >

Sent: Thursday, May 27, 2021, 07:55:17 AM EDT

Subject: Nick of time response/Glad your kid is okRe: Your kid/meg worried

Hi Mark.

Thank you for writing back as I was going to draft something to look after your kid.

I sent a motion for the supreme court to rein in its arms. I actually retained the new ODC guy in a case as an arbitrator. He should know better than to unlawfully interfere.

I am reviewing a slew of executive orders where I see Bush Junior, Obama, Trump, and Biden all misbehaved. In particular Bush Junior talked about deregulating obstacles meaning the free exercise clause in 3 or more of his orders to pay churches to perform government work in a whored, bought or bartered, bribed union of church and state to essentially whore churches to the state, the blasphemous backing by buying the appearance of backing of God. This is an abomination.

I digress, Biden misbehaved in his Feb 14 executive order by talking about preserving the free exercise clause while destroying the same by continuing to purchase churches bough, bartered for, bribed, backing not free but bought, for services to perform government work, causing inefficiencies guaranteed. The churches create the illusion of charity but they serve business greed and supplement with fundraising which as you know I believe damns people to hell as not true charity by teaching deception as truth. Business greed is not true charity per Jesus Matthew 6:1-5, but is the mark of children of the devil, the beast, should they not wash away such inequity and be made clean.

The root of the religious dissention we have seen in our country in recent years is the love of money not the love of any God. Trump merely watered it, allowing it to pierce through the surface with unholy weeds. (biblical reference weeds). I see federal servants speaking of global war, using my God as Mickey mouse mascot for war profit, exploiting the pandemic. That is not okay. The courts are my hope for a hero to correct and prevent harm. They can make Biden behave too. They will be in charge of guiding him to do good, by love of humanity, not evil, by love of funding and money at the cost of sacrificing troops lives. God desires mercy not sacrifice. Christians go after the 1 and leave the 99 behind. I should fear God should I sacrifice the weak, the sick, the elderly, the vulnerable, the misguided to the wolves to serve the pack. Troops are manipulated like the government's bitches, like dogs by praise and profit to be exploited like call girls for war money, not freedom. I must seek to protect them. You may see my words and deeds as an insult offense, but God teaches it is love to reign in folks from the slaughter. Love is not feeling good. It is actually feeling bad, having a conscience at harm to one's brother, our brother is all of humanity, to lose one to eternal sin, is to lose an irreplaceable treasure forever. Courts can guide the misled back to the narrow way and save souls, if I guide the misled courts to do so. The Supreme Court is hard headed and confused. I must seek to correct them. I am pretty sure my case will go to the Supreme Court eventually if not on this appeal, unless Biden surprises me by agreeing to a stipulation.

I asked the court to stand down its arms.

So, glad you spoke up since I already drafted something and held off on sending it since it was late. Please tell your arms to stand down and stop interfering to prevent escalation. Attached, please find a motion the court received where I respectfully requested your arms stop interfering in my case through threats or otherwise, especially Judge Clark. I was so disappointed in him.

Thank you. Have a good day.
With love and gratitude your kid is okay,
Meg
On Wednesday, May 26, 2021, 07:17:58 PM EDT, Mark Vavala <mvavala@dsba.org> wrote:</mvavala@dsba.org>
Hi Meg. No worries! My daughter moved to New York after working with ODC only for a short while. She wanted
to live in Manhattan. My niece Kathy still works at ODC.
Thank you for your kind words. I really hope that you are well and aren't too stressed over all the things you wrote me about last time. I think the last President did some horrible things and I'm hopeful we all get a break from that behavior. It would be nice if everyone just treated each other with compassion and kindness. We never know what someone is going through.
Please take care of yourself. And stay safe.
. Mark
From: Meg Kelly < <u>meghankellyesq@yahoo.com</u> > Sent: Wednesday, May 26, 2021 11:54 AM To: Mark Vavala < <u>MVavala@dsba.org</u> > Cc: Meg Kelly < <u>meghankellyesq@yahoo.com</u> >
Subject: Your kid/meg worried
Hi Mark,
You were kind to me, and respected me as a human, even if you did not agree with me over all these years.
Others have not been so kind. Thank you.

I am concerned that your daughter may have lost her job at the ODC, because you were kind, and treated people like me fairly, without disparate treatment based on poverty, religion or political association.
I am sad I did not write anything to the court to address that.
I am sorry people get into trouble in this world for doing the right thing.
I hope your kid is working at another safe place.
Thank you for being a hero by your love for humanity, not sacrificing people for profit or praise. That makes you different.
Love,
Meg

#### SUPREME COURT OF DELAWARE

LISA A. DOLPH Clerk SUPREME COURT BUILDING 55 THE GREEN DOVER DE 19901

DORIS J. ADKINS
Chief Deputy Clerk
DEBRA J. ZATLOKOVICZ
Senior Court Clerk
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(302) 739-4155 (302) 739-4156

February 2, 2021

Meghan Marie Kelly, Esquire 34012 Shawnee Drive Dagsboro, DE 19939

Dear Ms. Kelly;

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

Very truly yours,

/s/ Lisa A. Dolph

### MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive Dagsboro, DE 19939

February 5, 2021

Delaware Supreme Court 55 The Green Dover, DE 19901

RE: Suspension of lawyer fees/Equal Protections concern/New Request 2022, flat fee for all licensure fees not based on years which is not rationally related to a legitimate purpose, instead arguably may be age discrimination to weed out older lawyers

Dear Honorable Supreme Court Chief Justice Collins J. Seitz, Jr.:

I hope you are healthy and well. 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.

Just like not all secular laws are afforded the same weight, but are superseded by greater laws for example federal laws preempt and supersede conflicting state laws, not all of God's laws are afforded the same weight but are superseded by the law of love. (See, John 19:11, Jesus told Pilate ..." the one who handed me over to you has the greater sin."); (See, 1 John 5:17, "All wrongdoing is sin, and there is sin that does not lead to death."); (See, Luke 6:3-4 "Jesus replied, 'Have you not read what David did when he and his companions were hungry? He entered the house of God, took the consecrated bread and gave it to his companions, and ate what is lawful only for the priests to eat." King David violated the Levitical laws to live for God. Yet, he was not guilty of wrong doing.); (See Hosea 6:6, Matthew 9:13, Matthew 12:7, Proverbs 21:3, Isaiah 1:11, God desires mercy not sacrifice.); (See, Isaiah 1:13-15 "Bring your worthless offerings no more: your incense is detestable to Me—your New Moons, Sabbaths, and convocations. I cannot endure iniquity in a solemn assembly. 14I hate your New Moons and your appointed feasts. They have become a burden to Me; I am weary of bearing them. When you spread out your hands in prayer, I will hide My eyes from you; even though you multiply your prayers. I will not listen. Your hands are covered with blood."); (See, Matthew 12:1-8, Mark 2: 23:28, and Luke 6:1-5, Jesus picks grain on the Sabbath, allegedly violating

the law of the Sabbath, but not breaking the law.); (See, Matthew 12:9-14, Mark 3:1-6, and Luke 6:6-11, Jesus healed a man with a withered man on the Sabbath); (Luke 13:10-17, Jesus healed a woman with a hurt back on the Sabbath.); (Luke 14:1-6, Jesus healed a man with dropsy on the Sabbath); (John 5:1-9, John 7:21-24, Jesus healed a cripple man, who could not go into a pool of water without help.); (John 9:1-41, Jesus cures a blind man on the Sabbath.).

I believe the courts have the power to save lives and eternal lives.

Our nation is in need of a hero. I know that the Courts have no power unless lawyers humble themselves and ask for their help. Now is a time I need my license to practice law the most.

I live in Sussex County where Bible boys gone wild teach anarchy, lawlessness, is freedom. Lawlessness is not freedom, but tyranny by those with money, power and connections without restraint, called laws to stop them from harming others to serve their own.

Some churches are misbehaving by inciting insurrection and disobedience to laws to attend services, which they call Sabbath, to serve their coffers.

Many preach breaking the Sabbath violates Jesus Christ's teachings.

Jesus teaches us we break a greater law of love by not safeguarding the

health and valuing the dignity of lives of others, by failing to break the socalled Sabbath to preserve the health and lives of others. Id.

They preach for their own vanity, their own purpose, not to glorify God by his love and mercy. They are confused, and really do not know. They are tempted to break small laws meant for their benefit, to break greater laws by profiting off of the unholy cries for "Gods, guns and freedom." My God is a God of life and love not death for dollars.

Our nation and the world is in trouble. I believe the Courts have the power to be our hero to save us, if we only have the courage to ask.

Things are not ok down here in Sussex. People see evil as good and good as evil.

The government through its agents misbehaves by citing the same passages in the Bible the KKK cites to serve their own gain under the guise of Godliness by violating Jesus's teachings too.

Jesus says there is "no greater sacrifice than to lay down your life for one's friend." John 15:13 Jesus next says "You are my friend if you do what I command you." John 15:14 Jesus commands us to love our enemies, not kill them. Matthew 5:38-48, Luke 6:27-36, Romans 12:14-21, Proverbs 25:21, Exodus 23:4-5. Yet, the military misleads our troops to harm enemies, under the guise of Godliness, but in truth to serve the vanity of

men. The troops are misled to potentially be damned to hell by serving reign by might not right, reign by violence and threat of death like barbarians instead of logic and reason in the courts. See, Hebrews 2:14, the devil has power over death. Jesus came to give life and eternal life. See, John 6:51.

With the acceptance of the cloak of government authority, government servants have fewer freedoms to share their belief and may not condemn nor support a religious belief under the inherent threat of persecution against people for believing differently than those with government authority.

This Court does not have to believe as I do, to safeguard everyone's freedom to worship or not according to the dictates of their own conscience, without government sponsored persecution.

The Supreme Court misbehaves too. Please see the attached. I fear

Justice Alito, Justice Kavanaugh and Justice Thomas are confused into

believing in sacrificing human life to keep the so-called Sabbath and to serve

business greed is keeping the law. They are wrong. They love money not

humanity, and will sacrifice those the Constitution protects to serve the

almighty dollar under the guise of an almighty God or good. See, Matthew

6:24. I think those justices will go to hell if they are not corrected by our

courts or otherwise. Confusion kills. See 2 Corinthians 4:4.

This Court has the power to save lives and eternal lives, even the lives of US Supreme Court justices, via correction with mercy, to prevent condemnation by transforming wrong doers into right doers, by love for one another, not exploitation of one another to serve the love of money.

Thank you for your kind consideration.

CC: LD, via Email

Respectfully submitted,

Meghan Kelly, Esquire

Bar # 4968

34012 Shawnee Drive

Dagsboro, DE 19939

(Word Count 1431)

Smooth as a shift of the sale of the sale as he shift of the sale as he shift

The Supreme Court has before it a case to determine whether a government entity violates the free exercise of religion of a religious business organization by refusing to pay a Catholic agency to foster kids.

l argue it is not. I must confess, the Cake decision in Masterpiece Cakeshop v. Colorado Civil Rights Commission, where a similar issue arose, was as smooth as butter, so easy to swallow. But I realize now, the Honorable Supreme Court's decision is poison in that case too. It just took months to get through my hard head because I was so captivated by the brilliant, persuasive writing of the Supreme Court Justices.

Thank you for allowing me to share some hard to swallow words, that are nourishment to maintaining our freedom from government sponsored private oppression.

The distinguishing element in the Cake case and the one before the Honorable Supreme Court now is performing business by barter or exchange is not freedom, but costs a form of exchange. The critical element is looking at the permission to accept money in the form of business verses lawlessly turning people away, from serving a good or service based on personal religious beliefs or beliefs of conscience. The license to accept money verses the fundamental right to give money for a service or good without being turned away, based on religion, like race, or place of origin, is the critical.

Think of the horrors of our own history that we have overcome, the signs "No Catholics served here," "No Irish," or "No blacks."

Think of Delaware's ugly scar in *William Burton v Wilmington Parking Authority*, 365 U.S. 715 (1961), a government agency wrongfully permitted a business it leased a restaurant building to, to maintain a policy of saying no blacks served here. The Supreme Court kindly, like a loving parent, corrected our own misbehavior Delaware. It is wrong to tell people they may not be served here, even under the guise of God or good.

We have the freedom to worship or not according to the dictates of our own conscience, without government sponsored public or private persecution.

I thought hard about the 13<sup>th</sup> Amendment, involuntary servitude, and truth clunked in my hard head. Business is not a right. Freedoms are not for sale. Business is not a religion. Business greed is not God.

Businesses should not be in business if they get to turn away certain segments of society. If your religion requires discrimination in the business, you may choose a different business.

Freedom is not for sale. The government misbehaves by endorsing the premise those who do not conform to the beliefs of businessmen, women or entities may be turned away. Will business greed under the guise of Godliness become the religion of many more? Jesus Christ says, "You cannot serve both God and money." Citing, Matthew 6:24. I choose to guide folks to love one another, not exploit others to serve their own for their love and trust in money, as God.

Should the Supreme Court declare the mark of the beast, business greed is God, Congress through the interstate commerce clause has the power to balance, correct the Supreme Court's misbehavior, by passing laws to prevent businesses from turning people away based on religion, or other factors under the guise of religion, such as race, or place of origin.

Thank you for allowing me to share my concerns.

## Exhibit B

## Office of Disciplinary Counsel

SUPREME COURT OF THE STATE OF DELAWARE

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

DAVID A. WHITE Chief Disciplinary Counsel

PATRICIA BARTLEY SCHWARTZ Disciplinary Counsel

> KATHLEEN M. VAVALA Disciplinary Counsel

August 23, 2021

CONFIDENTIAL VIA EMAIL & U.S. MAIL

Meghankellyesq@yahoo.com

Meghan M. Kelly, Esquire 34012 Shawnee Drive Dagsboro, DE 19939 Are Christians unfit to

Are Christians unfit to

practice law

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

Dear Ms. Kelly:

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

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

# Exhibit C

- In September 2020, Respondent filed a lawsuit in the Court of Chancery 6. of Delaware against former-President Donald Trump: Meghan Kelly v. Donald Trump, Case No. 2020-0809 (September 21, 2020). The Court of Chancery dismissed Respondent's complaint. Respondent appealed to the Supreme Court of Delaware, which affirmed the Court of Chancery. On August 23, 2021, Respondent filed a writ of certiorari with the Supreme Court of the United States.
- 7. The factual averments, argument, and other content in Respondent's filings in the Delaware courts, raise serious concerns regarding her mental capacity to practice law. Respondent's statements and arguments: lack focus and clarity; are objectively illogical; and rely on non-legal sources, including the Bible, instead of appropriate legal authority. The following excerpts demonstrate, by way of example only, Respondent's apparent inability to make cogent, rational legal arguments:

sacrifice to follow Jesus).

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