

# Appendix T-2

IN THE SUPREME COURT OF THE STATE OF DELAWARE

IN THE MATTER OF A MEMBER	§
OF THE BAR OF THE SUPREME	§ No. 58, 2022
COURT OF DELAWARE	§ Board Case No. 115327-B
	§
MEGHAN M. KELLY,	§
Respondent.	§

Respondent Meghan Kelly’s Motion for good cause, 1 Pursuant to Supreme Court Rule 9, to Unseal the Record, 2. to declare self-regulation of attorneys, other Professions, and judges unconstitutional, making business above the law, by making the dictates of professionals, or bureaucrats within agencies, as opposed to laws enacted by congress people, checked by the vote of the people, the law, and 3. in lieu of and in the alternative, eliminate the secret trial requirements of professionals before Boards, including the Board on Professional Responsibility, requiring the choice of an open or confidential forum left to the accused professional, instead of requiring a secret proceeding, concealing the accused’s defense, to the advantage of the accuser state, in violation of equal protections, and due process 1<sup>st</sup> and 14<sup>th</sup> Protections

Respondent Meghan Kelly’s Motion for good cause, 1 pursuant to Supreme Court Rule 9, to unseal the record in this case, 2. to declare self-regulation of attorneys, and judges unconstitutional, allowing impeachment and judicial determinations in case and controversies to be the only means to correct professionals, attorneys and judges, and 3. in the alternative, eliminate the secret trial requirements of professionals, requiring the choice of an open or closed forum to be at the discretion of the accused professional, instead of requiring a secret proceeding, concealing the accused’s defense, to the advantage of the accuser state, in violation of equal protections, and due process 1st and 14th protections.

**I Unsealing Pleadings in this case**

1. Opposing counsel did not object upon my request for their stance.
2. This Court filed an Order deactivating my license to practice law. The Order requires I petition the Board in a secret proceeding, where documents are sealed, in order to have

the mere opportunity to be heard, albeit before a biased forum, on restating my property interest in my active license to practice law.

3. I intend to file a Rule 18 Motion for Reargument on this Court's Order deactivating my active license to practice law.

4. I also intend to appeal the Order to the US Supreme Court, on the record.

5. I must report to the 6 other jurisdictions where I am licensed to practice law, after a decision is found on my Motion for Reargument or the time to Reargue has lapsed.

6. To my horror, the Clerk of Court sent out the unfinalized decision to every jurisdiction I am licensed to practice law, when I googled my name and discovered I was being sued in one such forum.

7. I may be sued by 6 courts based on this Court's unfinalized Order.

8. Should I lose on appeal or collateral attack in the DE District Court, I may be required to discuss the record of this matter, upon my petition for restatement as an active member of the bar.

9. I have one copy of the file in paper form. Yet, public access to court copies prevents economic costs that cause 1. a substantial burden upon my access to the courts in defense of my fundamental rights, and, 2 a substantial government burden requiring I choose between forgoing my free exercise of religious beliefs against indebtedness or my right to petition the Courts and the Board, relating to fundamental rights. Exhibit A <sup>1</sup>

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<sup>1</sup> Exhibit A shows my poverty, and my strong opposition, as an attorney, in inactive status, against term limits or Congressional control over the US Supreme Court. I also oppose self-regulation. Impeachment and law suits are the two means to correct judges. No judge should be

10. My computer does not permit storage of all data, and gives limited room by professional design to force consumers to use the trackable internet storage systems.

11. This Court is aware that my computers have broken, and have been replaced or repaired at times.

12. I require electronic access to documents, by making them public, to prevent a substantial burden on costs by requiring I copy physical documents to defend my person, should I lose, more data, as I have previously lost during this proceeding.

13. State Law librarian Galen Wilson kindly indicated he could pull public pleadings should I lose them for any technical reason.

14. More importantly, unsealing the documents, by my request, allows me a fairer opportunity to be heard in accordance with my asserted Due Process and Equal Protection Protections, as a party of one. US Amend I, XIV. Unsealing the documents grants me, the professional accused, the opportunity to be heard before the public too, as to defend my character before the world as a believer in Jesus Christ as savior, not in money for security.

15. The inherent, intentional, threat of releasing an opinion against the accused, while sealing the proceedings before the Board, and documents in the accused defense, places the

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controlled by business professionals, including professional boards, or by Congress, outside of written rules they may draft relating to impeachment. The judges will be tempted down the line by automation's ease, to potentially have their position as judges eliminated through automation. Automation has no power to render justice with mercy like judges. Judges have the ability to critically think beyond the standards, to see clearly the unique case before it, to render true justice based on truth, not conformity or sameness. Judges have a duty to protect people's freedom who think differently than they do, even if they believe those beliefs harm business's bottom line. What is more important money or freedoms under our constitution? I argue the Constitutional laws protecting individual liberty and individuals supersedes professions and entities who desire to sacrifice individual liberties or individuals for the entities or associations bottom line.

accused, at a disadvantage. This practice is made to intentionally chill accused professionals' speech contained in the petitions to defend their position. The voices of professionals, including my voice, are silenced by these inherently unjust rules. This punishes learning by silencing professional critical thinking to be conformed to the standards, which may exploit customers for convenience, costs, and material gain.

## II Self-Regulation

16. Self-regulation takes government out of the hands of the government and makes business above the law, by making business, and professionals desire for money, the law.

17. This biased self-regulation enslaves professionals to business greed, not good, not based on freedom in a fixed bad business economy.

18. Allowing Professionals to self-regulate, corrupts justice by tempting professionals to look after their own, at the cost of exploiting others, untamed by the just rule of law to prevent killing, stealing or destroying human life for what I argue is the mark of the beast, business greed. Professionals have a tendency to conceal their own misconduct to prevent harming their mere appearance, and reputation of their colleagues. <sup>2</sup>

19. Self-regulation by deferring to professional standards causes injustice, by preventing courts from correcting professional standards that harm people.

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<sup>2</sup> As a Christian, I believe people sin for sacrificing justice to protect the illusion of the appearance of justice within the courts. Actual justice includes learning from our mistakes, not covering them up as this Court did by sealing four documents in *Kelly v Trump*, and terminating the employment of two court staff to conceal material evidence in my case. *John 7:24*, "Stop judging by mere appearances, but instead judge correctly."

20. As a child of God, I believe people sin by teaching man to blindly trust science, professionals, experts, research or innovation. I believe people are misled to harm by blindly trusting in man, the creature, the created and his creation, his scientific work, research, products and services as god and guide.

21. Perfection is not the standard, even for judges. Where there is humility, there is grace, improving the world here and in eternity. Where Government and government backed partners teach loyalty to profession, pride in profession, or position above loyalty to the Constitution, or where business is the law, there is lawlessness, by sacrificing people, and individual liberty for material gain.

22. This lawlessness, and corruption within government creates a threat of economic, physical or social persecution against my person and the public.

23. Partial forums, including this Court's, as applied, and the Board's, focus on professions, guarantee lawless injustice by focus on money instead of caring for people and their individual liberty above money, productivity, costs and convenience.

24. The practice of law is not a mere business. The practice of law protects freedoms that are not for sale, by barter or exchange. Money is not the law. The practice of law requires independent, impartial, critically thinking judges who uphold people's Constitutionally protected freedoms to think, live, believe, exercise belief, associate by the dictates of their independent, individual conscience, not the dictates of money or professionals.

25. Injustice is guaranteed when a judicial determination is for sale, a matter of barter or exchange as opposed to truth under the law. This affords those without anything to exchange, except their souls to slavery in violation of the 13<sup>th</sup> Amendment, at a disadvantage, in violation

of the Equal Protections Clause's protection of the poor, and common person's fundamental right to access to the courts. The Courts must be more concerned with actual justice than the mere appearance of justice to serve their positions.

III. I request the Court allow self-representation for all professionals accused before a  
Professional Board.

26. This Court requires I petition before the Professional Board in order for opportunity to be heard to regain my active license to practice law. The Board requires by default, sealed secret hearings that give the state an advantage to the detriment of the accused, me.

27. A closed proceedings before professional board violates my due process right to a fair trial applicable to the state pursuant to the First and Fourteenth Amendment.

28. It appears professionals are afforded fewer opportunities by impartial forums where the focus is on lawless lusts, business greed, business marketing, and materialism at the cost of denying justice to people unconditionally, not for sale, with focus on the bottom line of business.

29. These closed proceedings, as applied to me as a party of one, arguably violate my First Amendment right to free exercise of religious-political speech, religious-political belief, religious-political exercise, religious-political petition, and religious-political association.

30. The closed proceedings arguably violate the Due Process and Equal Protections under the law, of parties of unconfirming professionals, including me, who critically think beyond the standards that profit professionals at the detriment of the public, and the First Amendment right to Petition, pursuant to US Amend I, XIV.

31. Requiring a secret proceeding, concealing the accused's defense, to the advantage of the accuser state, while permitting the state to declare the final outcome, if it is detrimental to the accused professional to the public, disparages the professional's character before opportunity to be heard on appeal, or with the reasonable, foreseeable intentional result of chilling the free exercise of critical thinking, belief, speech, professional affiliation, beyond the dumbed down conformed standards which stifle innovation by punishing free enterprise, free thought, and free debate.

32. The protected freedom of the people to use their minds, not economic force through money by profit or monetary penalties is what improves business, while protecting something more precious, individual freedom.

33. The closed proceedings disadvantage me, the accused, and creates injustice in the loss of fundamental rights, sold in exchange for the convenience of business, making even the courts corrupt, in that they focus on productivity, convenience, costs, in lieu of individuals and individual liberties, making people for sale, not free, by focusing on the bottom line.

34. Professional Boards should not make business and money the law. Impartial judges in the courts, and elected law makers should determine the law, based on critical independent thinking to determine the truth, not conformed to the force-fed thoughts of professionals who make money the law. The Equal Protections Clause may be violated by making those with something to barter, power, position or profit, able to buy justice, whereas the poor, though not less valuable, are left with nothing to barter, but their own soul. Justice is not for sale, but is a matter of truth, not barter or exchange. I hate the scales the pagan goddess Lady justice carries, and hate her blind eyes and sword. A scale represents business, not equal protections under the law. I believe she teaches the way to hell by teaching justice can be



compromised and weighted based on material gain. Mercy is more important than money. Correction in court to heal victims, while helping wrong doers improve by guiding them to make better choices, without controlling a no longer free people by artificial indebtedness, is more just. The sword represents heartless vengeance, with blind unconcern, not a loving leader shepherding his sheep. This dumbed down, ignorance is innocence, is a lie. I want judges to see clearly to care for the people. Judges need not be perfect, yet humble in that none are God, not even biased professionals, science or experts. I want judges to independently critically think, at the risk they may make mistakes. Otherwise, injustice will remain. Lawlessness will remain to be the letter of the law by allowing professionals in diverse areas to kill, steal and destroy for the bottom line, because they did not know. They did not care to know. They relied on the ever changing science. I believe people go to hell for not knowing, not using their own brain, which is sad. We should stop rewarding hardening our hearts from caring to know, to prevent the pain caused by loving others, which requires sacrifice to self.

35. God teaches vengeance is God's and if we play God we reflect the image of the lawless one Satan and are in danger of hell. It is scary when God says, Woe to those who draft unjust decrees. (Citing, *Isaiah* 10:1-6) I believe this means damned to hell are you should you not repent. Unjust decrees are based on love for money, driving out the love of humanity.

36. I want judges to see clearly, unblinded by desire for convenience conformity grants, but seeing clearly to seek true justice, to overturn unjust decrees.

37. The Sixth Amendment to the U.S. Constitution provides defendants in criminal cases with the right to a public trial. I argue this right must be extended to accused professionals. I have a Sixth Amendment right to a public trial to petition the Court to restate my active license to practice law.

#### IV. Risk of injustice to the Public

38. I realize that the Disciplinary Counsel in the 6 other jurisdictions I am licensed to practice law in may disagree with my request because it will eliminate their job, and may give them incentive to punish me more harshly, to look after their position at the public's expense.

39. It is self-serving for me to cowardly exclude my request that this Court declare professional self-regulation of attorneys, other Professions, and judges unconstitutional.

40. Doing what is right and just, in the eyes of God, not man, is more important than doing what is beneficial to me.

Wherefore, I pray this Court grants my motion.

Dated August 15 , 2022

Respectfully submitted,

/s/Meghan M. Kelly  
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# Appendix T-3

IN THE SUPREME COURT OF THE STATE OF DELAWARE

IN THE MATTER OF A MEMBER           §  
OF THE BAR OF THE SUPREME       § No. 58, 2022  
COURT OF DELAWARE               § Board Case No. 115327-B  
  §  
MEGHAN M. KELLY,                   §  
    Respondent.                       §

Respondent Meghan Kelly’s Motion to

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

Respondent Meghan Kelly in “the interests of justice” pursuant to Rule 8, to 1. Declare the reporting requirements unconstitutional requiring by written rule I, and other disciplined attorneys, violate my 5th Amendment right not to testify against myself to the government in order that the government may have evidence to prosecute me, 2. Declare the Case and Controversy requirements are not met in the system of attorney self-regulation. US Amend V, U.S.C.A. Const. Art. 3, § 2, cl. 1.

**I. Factual Background**

1. On August 10, 2022, this Court filed an Order deactivating my license as disabled.
2. I incorrectly believed the Delaware Clerk of Court, Lisa Dolph, (“Clerk”), automatically gave the Order to every jurisdiction I am licensed to practice law in (“jurisdictions”).
3. On August 13, 2022, I filed the attached letter in the with the Third Circuit Court of Appeals in my Civil rights case, 21-3198 Exhibits. (**Exhibit A, excluding exhibits**).
4. Upon discovery, I learned the law clerk did not appear to send the Order to every jurisdiction where I am licensed to practice law.

5. I came to the realization, as soon as I report, I will be prosecuted by different governments I report to, in violation of the Constitution's Fifth Amendment protections and common sense.

6. At the threat of punishment, I must report. If I report I face greater punishment, than if I do not report, which does not seem fair. This is likened to the holocaust, where my ancestors in Lithuania faced threats by the Nazis, during World War II. The Nazis allegedly required imprisoned people to dig their own graves. So, they or their people may be killed and disposed of in the graves.

7. Similarly, the reporting requirements for attorney discipline proceedings requires I give the gun to other Courts. So, they may mechanically shoot me in the head, by reciprocation or worse.<sup>3</sup>

8. I filed the attached letter in the Third Circuit, striking language relating to reporting, and indicated it was for more informational purposes only. (**Exhibit B, without the attachments thereto**).

9. Next, on August 16, 2022, I sent the attached letter to the Third Circuit, and similar letters to every other jurisdiction, by placing the same in the mail box, wherein, I invoked my Fifth Amendment right, requested a waiver of the reporting requiring, and additional time to report the discipline should the waiver be denied. (**Exhibit C**).

10. On August 17, 2022, I received the attached Order from the Third Circuit indicating they would use the letter I filed in my civil rights case, any reason the Court deems. (**Exhibit D**).

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<sup>3</sup> This is imagery, not a real gun.

11. In the evening, around 6:50 PM, the Third Circuit Court deactivated my license to practice law. **(Exhibit E)**

12. I did not know how the Third Circuit found out, and asked Lisa Dolph, who referred me to the ODC.

13. I contacted the ODC per the attached email, and have not received her response. **(Exhibit F).**

14. I regret I foolishly complied with reporting procedures that may have caused my prosecution in the Third Circuit Court. I should have known better as an attorney safeguarding Constitutional liberties, which preempt conflicting state laws and regulations. The United States Supreme Court held, “The Self-Incrimination Clause of the Fifth Amendment, which has been absorbed in the Fourteenth, extends its protection to lawyers, and should not be watered down by imposing the dishonor of disbarment and the deprivation of livelihood as a penalty for asserting it.” Citing, *Spevack v. Klein*, 385 U.S. 511, 516 (1967) (holding that Fifth Amendment applies in attorney discipline proceeding). Nevertheless, I asserted the Fifth in all other jurisdictions, and argue this reporting requirement violates the Constitution and must be declared unenforceable against the Fifth Amendment, and public policy.

## **II. The Reporting Rule is Unconstitutional by required waiver of the 5<sup>th</sup>**

### **Constitutional protections if not invoked.**

15. The rule requiring licensed attorneys to report disciplinary actions against their person in other jurisdictions, where they are licensed to practice law, is the rule in all federal and state courts. See Del. Law. R. of Disciplinary Proc. 18 (a).

16. I argue this rule is unconstitutional and must be declared unenforceable. Under the compelled government threat of punishment for failing to report, licensed attorneys must

self-incriminate, in violation of US Amend. V. The self-reporting rules eliminate a Constitutional right unless invoked. An accused, me, should not have to invoke the 5<sup>th</sup>. The self-reporting rule per se violates the Constitution. The Constitution preempts this rule.

17. Requiring I report to this Court by written rule, and other courts where I am licensed to practice law, requires I provide evidence to the state in order that they may prosecute me relating to my license to practice law in violation of my 5th Amendment right against self-incrimination.

18. In *In re Gi Yeong Nam*, 245 B.R. 216 (Bankr. E.D. Pa. 2000), the Court held:

“Once a witness voluntarily reveals an incriminating fact, Fifth Amendment privilege against self-incrimination cannot be invoked to avoid disclosing the details of that fact unless the witness' answer to the particular question posed would subject him or her to a “real danger” of further incrimination.” U.S.C.A. Const. Amend. 5.

19. In my case, volunteering information by reporting orders against my license subjects me to automatic government prosecution. The fact I appeal orders on public record before appellate courts, does not remove the” real danger” of further government prosecution in proceedings bearing “a close relationship to proceedings criminal in nature.” *Id.*, and *Citing, Kelly v. Swartz*, No. CV 21-1490-CFC, 2021 WL 5083435, at \*2 (D. Del. Nov. 2, 2021).

20. Should I notify **state courts** of an order incriminating me, it appears the Clerk customarily gives the self-incriminating notice to the Office of Disciplinary Counsel who automatically prosecutes.

21. In **federal courts**, the procedures are different. It appears the self-incriminating-reporting letter is given to a federal judge or a panel of federal judges, who may choose to prosecute the attorney by reciprocal deactivation of license or by a heftier penalty. Either way, there is an automatic deactivation of my license once a case is open.

22. The rules give the illusion of impartial discretion, but prosecution appears mandatory. Sam, a staff at the Delaware District Court, said she had no choice. She was required to follow the procedures against my license, which includes automatic suspension of my lawyer privileges, as the Court automatically reciprocates any Order disciplining lawyers.

23. Should a federal judge or panel of federal judges elect to prosecute me, or other attorney through reciprocity, the Court is required to issue a notice allowing attorneys to show for good cause why such automatic taking of property interest must not occur.

24. I, the accused disciplined attorney, am required to bear the burden to prove my innocence or defect in the process, against the assumed guilt. The burden of guilt until proven innocence appears to violate my Fifth Amendment rights. I reserve this issue for appeal, while acknowledging I must research this.

### **III. The system of reciprocity violates Case and Controversy Requirements**

25. Federal reciprocity requires the Court to be the prosecutor, the judge and witness too, not an outside adverse party, violating the case or controversy requirements of U.S.C.A. Const. Art. 3, § 2, cl. 1.

26. In federal reciprocity cases, I would not serve an opposing counsel in the US Supreme Court or any other federal court, should reciprocal discipline be conducted against me. I would be defending myself against required Court prosecution where I, the accused, would bear the burden of clear and convincing evidence as to why the Court must not prosecute me, in potential violation of my Fifth Amendment rights.

27. The Third Circuit held,

“The existence of a case or controversy requires: (1) a legal controversy that is real and not hypothetical; (2) a legal controversy that affects an individual in a concrete manner so as to provide the factual predicate for reasoned adjudication; and (3) a legal controversy



with sufficiently adverse parties so as to sharpen the issues for judicial resolution. *Rendell v. Rumsfeld*, 484 F.3d 236 (3d Cir. 2007)

28. The Third element is not met in all cases before federal disciplinary hearings.

There is no adversarial party when the entity prosecuting is judge and jury, including mine. This system of reporting must be overturned to preserve the Constitutional liberties of the accused. This issue is capable of repetition, yet evading review, and should be, in the interest of justice under Rule 8, be considered by an impartial, nonfederal, judicial forum. A federal court will not admit it violates the Constitution by blindly adhering to its internal procedures, even the United States Supreme Court requires the same. This Court must, in the interest of justice, consider these important issues.

#### **IV The case and controversy requirements are not met in my case.**

29. There arguably is no controversy in my case, just a cover up of court misconduct, elimination of witnesses, the wrongful removal of four public documents material to my defense from public records, and government persecution towards me, but for my First Amendment exercise of or assertion of my protected Constitutional rights

30. The record shows, I do not intend to practice law before the courts should the restriction on my license be lifted. I intend to seek to rejoin my former law firm where I would perform real estate settlements.

31. There is no harm to the state showing a case or controversy. There are mere complaints about run on sentences, typos, and citations to the sham fixed transcript, I maintain my objection to, where the reporter misrepresented what I said to intentionally collude to fix the outcome or because she could not hear me.

32. The record also shows the State laments I discuss the bible as a source of my religious belief relating to petitions where I assert and defend my religious exercise. My

religious beliefs and compelled violation of those beliefs and exercise of my religious beliefs are in issue as the protected liberty interest I sought to protect in *Kelly v Trump*, and one of the liberty interests I seek to defend in this present case. It is unconstitutional for the Court to persecute me, because I invoke my First Amendment right of **belief**, religious-political-belief, religious-political **exercise**, religious-political-**association**, religious-political-**speech**, and my right to **petition** the Court to uphold these religious-political fundamental rights, despite the State's disagreement with my beliefs, typos, or inconvenience that my poverty creates to the court.

33. The State is aware of my circumstance. Due to lack of resources, working computers, printers, paper and other luxuries, I had typos and run on sentences in some of my pleadings. I did not have the luxury of time or resources to proof read or correct documents. I typed desperately wherever I could use computers or print documents, including at libraries, with limited time at the computer. I was required to file timely or waive my rights. I do not regret imperfectly standing up for my religious belief from government persecution.

34. I would regret doing nothing. If I am unable to exercise the most basic First Amendment rights, speech, belief, association, exercise of belief and petition, then I may logically assume others are not free. Standing up for myself, now, no matter how imperfectly, may create precedent to stand up for the rights of others, well past my fleeting, soon to be forgotten life here.

35. The Court also grasps at straws by holding there is evidence of either a physical or mental disability. The state appears to be claiming my belief in Jesus is a disability, or there is a physical disability alluding to a possible physical disability as a harm to the state, with unclean hands, as the State has notice of my limitations. The state rushed the proceeding in violation of

my right for an opportunity to be heard, notice, an opportunity to prepare and defend perform discovery, call witnesses, having motions ignored, left unaddressed, in the forum below, or above, and intentionally caused foreseeable emotional distress, in hopes to make me physically ill to use it against me, like heartless monsters.

36. I dispute the allegation of physical disabilities as an “or” source for this Court’s holding. The record excludes sufficient evidence to make such a finding. Even if on appeal, the Court finds physical limitations, such as the shingles temporarily caused in my case or otherwise, such limitations would not limit my ability to practice law. And if such limitations are found, I invoke the protections of ADA protecting me from state discrimination, either by denial of meaningful access to the courts based on alleged disability, or denial of First amendment rights based on such disability, or my license to practice law based on any such alleged disability, without accommodation by the state. I reserve this for appeal.

37. Whether Constitutional protections are violated by the reciprocity system is a more important issue than mere appearance, and productivity, in terms of material gain for professions or businesses, at the cost of sacrificing freedoms.

38. The Courts, as government servants, work for justice, not money. If government judges, law makers and presidents care more about money and draft, enforce, and uphold rules that violate the more important Constitutional laws, than none of us are free.

39. If money is the law, then the people are slaves to the government by artificially indebtedness, under the guise of freedom.

40. I have a duty to uphold the Constitutional laws that protect something more precious than all the money in the world, individual liberty from government incited private or

public economic, physical or social burdens upon, but for the exercise of such Constitutional rights.

41. This Court's duty to uphold the same is even more stringent. The Constitution protects me, from the Government, including the Court, from persecuting me for the exercise of my fundamental rights.

42. Sameness is not fairness. Respecting people's individual liberty to believe, think, associate, live, exercise belief, and rights by the dictates of their conscience, no matter if it does not conform to the majority is a duty of this court.

43. In order to safeguard freedom, the government must let go of control, allowing lawful disorder the exercise of liberties and freedom creates in a world where not everyone is the same or chooses to believe the same or live the same.

44. The government's duty is to care for people, while protecting the people's freedom, not control and exploit the people for material gain and productivity, under the guise of order and improving the man-made-unnatural economy.

45. The issues relating to government compelled self-incrimination by the reporting requirements and the case and controversy issues are capable of repetition, yet, evading review. This Court must in the interest of justice consider these Constitutional issues. Otherwise, no other Court may and violations of freedom for the convenience of the government backed private business partners will continue into infinity, sacrificing humans for business greed, not good.

Wherefore, I pray the Court grants my Motion or at least entertains Constitutional concerns.

Dated August 19, 2022

Respectfully submitted,

/s/Meghan M. Kelly  
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# Appendix T-4

UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF PENNSYLVANIA

IN THE MATTER OF A MEMBER §  
OF THE BAR § Misc. No. 22-45  
MEGHAN M. KELLY, § Judge, The Honorable Paul S. Diamond  
Respondent. §

Respondent Meghan M Kelly’s Motion for permission to use electronic filing, and waiver of paper copies before this Honorable Court, and an exemption from PACER costs to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, and compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights

I Respondent Meghan M. Kelly pursuant to Fed. R. App. P. 2, in the interest of justice, move this Honorable Court for permission to use electronic filing before this Honorable Court even if my active license to practice law is placed on inactive/disability status/or disbarred in representing myself in this appeal, a waiver of paper copies, and an exemption from PACER Costs 1. to prevent unaffordable costs from becoming a substantial burden upon my access to the courts, 2. to prevent a government compelled violation of my religious beliefs against indebtedness in order to exercise my right to petition the Court in my defense of the exercise of fundamental rights, and 3.to prevent compelled involuntary servitude in exchange with access to the courts to defend my licenses and liberties from being taken away for my religious beliefs in Jesus. (Citing, US Amendments I, V, XIII).

I. Procedural History:

1. On August 27, 2022, I filed a status update letter with three disciplinary orders wherein I also notified the Court:

“I turned in my license on my vehicle and cut off my car insurance since the State of Delaware is preventing me from seeking to regain my former position performing real estate settlements with my former law firm.

I bike to drop off documents to other jurisdictions through the US Post Office which is 8 miles per round trip. I have been experiencing bad allergies.

I am grateful for this court's allowance of electronic filing [via email]. Thank you for your time and consideration." (Exhibit A, District Court Docket Item ("DI") DI-3)

2. This Court misconstrued my letter wherein I provided notice of reciprocal discipline and expressed gratitude for email filing authorization as a motion for ECF, and denied the letter as if it was a motion for a request I did not make. (Exhibit B, DI-7).

3. This Court's staff permitted me to electronically file by email by sending documents to [paed\\_documents@paed.uscourts.gov](mailto:paed_documents@paed.uscourts.gov), which I utilized for filing documents throughout this proceeding.

4. I appealed the matter which is now before the Third Circuit Court of Appeals. (DI 25, DI 27-DI-28) Sometime after the appeal and the filing of an in forma pauperis motion, the notice of appeal and the request for transcript this District Court's case manager, Gail Olson (hereafter "Gail Olsen") indicated she no longer allows me to electronically file by email at [paed\\_documents@paed.uscourts.gov](mailto:paed_documents@paed.uscourts.gov) . Third Circuit Docket Item ("3DI") 3DI-27)

5. This Court's staff, Nicholas recommended I send documents to Gail Olson's email address for filing [gail\\_olson@paed.uscourts.gov](mailto:gail_olson@paed.uscourts.gov) while placing the words "to file" on the caption.

6. Gail Olson understands I cannot use the Electronic Document Submission (EDS), since lawyers are not permitted to use it. I am a lawyer and I contest the disbarment to seek to be reinstated on appeal. I am also a Christian. I believe many things other people think are no big deal lead to certain damnation in the fires of hell. Knowingly lying for the convenience of others or to gain a material benefit violates my religious beliefs against sin, lawless enslavement to lusts. In order to register I would be required to say I am not a lawyer. I am a lawyer, even if I am not currently barred and will be barred when I overturn the order above. I assert my First



Amendment rights to petition, religious belief, and religious exercise of belief without government compelled violation of my asserted religious beliefs in exchange for exercising the First Amendment right to petition.

7. Gail Olson requested I send a Motion for ECF permission. She requested I apply as a party not as an attorney for efile rights. (Exhibit C) 8. Unlike EDS, I would not be compelled to lie under oath in violation of my religious beliefs in order to file a Motion for ECF

9. I did not understand how to file as a party under PACER until receiving clarification that I did not have to apply for two separate PACER accounts.

10. Without email filing rights or ECF rights, I am prejudiced by lack of time to defend multiple suits arising from or related to the original disciplinary order. This Court also knows I am prejudiced by poverty, religious objection to indebtedness and my assertion against involuntary servitude in violation of the 13<sup>th</sup> Amendment. DI-11, DI-19

11. I filed a motion to stay the proceeding with the Third Circuit Court of Appeals, to give me time I need to petition in this matter, other matters, attend to my health, visit loved ones and attend a funeral. My health has diminished. I am dehydrated and for a stint I lost vision in my eye. I was scared and remain scared of the very real risk of blindness and death associated with severe dehydration if I am left unaccommodated by the courts in the form of time. Exhibit D.

12. I also drafted a Motion for additional time with the Third Circuit I attach hereto and incorporate herein as Exhibit E.

13. Attached to the Motion for additional time I include my appeal of the reciprocal Order in PA. The US Supreme Court appeared to grant me some mercy by scheduling a

conference September 26, 2023 instead of more immediately. While I am concerned about the Federal default discussions in recent news where the news indicates funds may run out for some programs as early as in October 2023, I am grateful the court appears to be granting me a little time.

14. I had hoped to outline the plans of an economic overthrow, or reasons I believe the US Supreme Court is being attacked and how to prevent it in either the US Supreme Court appeal or the Delaware case, but I appear to be running out of time.

15. My health has diminished. I am quite dehydrated, and my goal is not to die for the vanity of wicked men who sacrifice humans for convenience or material gain. My goal is to defend my life, licenses, health and eternal life before these courts without government compelled not free waiver.

16. I require a stay to fight potentially 14 defendants in the civil rights case, Kelly v Swartz, 21-1490. I am scared as I defend my religious belief in Jesus as God not money and mammon as God. *Matthew* 6:24. I fight not for my mere license to practice law, but for my eternal soul from the fires of hell, my First Amendment private right to petition, First Amendment private right to religious-political belief, my private First Amendment right to exercise belief, my First Amendment private right to association, even as a licensed attorney, Equal Protections, procedural due process and other interests.

17. I was scared Judge Diamond was booby trapping me by asking me to draft a motion for ECF rights. Since he appeared to deny ECF rights not yet ripe for adjudication to cause me to forgo this law suit. DI-3, DI-7.

18. Judge Diamond seemed to booby trap me into disbarment too. This means this Court may do the same to others. It is not okay to use trickery to sacrifice individual liberties and the preempting Constitutional law for the vanities and the pleasure of the court. I confront judges to correct and protect the courts not destroy them by requiring fair forums for pro se claimants, without selective disparate treatment based on poverty or lack of representation. US Amend V. There are plans to destroy the courts. I seek to preserve the courts by preserving the rule of law.

19. I was scared to file this motion since this court appeared to have denied ECF access in bad faith to compel me to violate my religious beliefs or give up my First Amendment right to petition

20. I have been retired from PA since 2018. (Exhibit E, page 125 of 185) This court had access to confirmable data to confirm I have remained retired from PA since 2018 to date, with the additional insulting addition of disabled placed on my license despite the fact PA has no jurisdiction over me under its rules of limited jurisdiction. See, 204 Pa. Code § 85.3.

21. This Court appeared to booby trapped me by creating the assumption I was retired by asking me to draft a memorandum on why I should not be retired in its court too. I have limited time, resources and ability to research. The Court should not have placed me as disbarred instead of as retired. Moreover it is clear error of law, of fact creating manifest injustice against me to place me on retirement too, even if the order should be changed. I did not have notice of disbarment, and the Court had reason to believe I did not understand the consequences of retirement. This Court knew I was confused and exploited that confusion to get out of analyzing the voluminous amount of Constitutional issues in the underlying original

disciplinary case the reciprocal case is based on. The Orders in this Court violate my 5th Amendment right to notice, and a fair proceeding.

22. The US Supreme Court held in, *In re Ruffalo*, 390 U.S. 544, 551 (1968), “The charge must be known before the proceedings commence. They become a trap when, after they are underway, the charges are amended on the basis of testimony of the accused. He can then be given no opportunity to expunge the earlier statements and start afresh.”

23. I did not know the Eastern District Court would disbar me when I did not draft a memorandum as to why retirement in PA would not retire my license in its Court. I asked the Court be placed on retirement so as not to be barred as active, but I thought I might have been wrong on my assumption of retirement. I was confused without ability to research the issue due to lack of time and resources. It was a booby trap based on a misunderstanding similar to the entrapped lawyer relating to the disciplinary proceeding in *In re Ruffalo*, where I was denied fair notice and a fair and fair opportunity to be heard given my unique situation of facing 6 law suits, limited access to the courts given lack of time, health limitations and poverty creating a substantial burden to my access to the courts and religious belief against debt. Maybe the District Court misunderstood my letter which created manifest injustice. Reviewing the letter with fresh eyes I can understand why the District Court may be confused too. Either way the Order should be overturned.

24. While, I do not have easy access to resources, the District Court should have known retirement in state does not automatically retire my federal license unless specifically drafted in its rules. The rules do not require reciprocal retirement in my case. So, the District Court appears to have set me up to fall which is not fair or just. I gave the court notice I lacked time and resources to investigate. DI-9. I was under duress having noticed the District Court of

my collapse upon the floor of the post office due to lack of time to care for my health to sustain it. I noticed the District Court of my lack of resources to pay for car insurance, and my limited resources too. DI-3, DI-9

25. I did not have the means to research until later. I discovered and realized I must appeal the Eastern District of PA Order or potentially face 6 new law suits. That is important to prevent.

26. After researching I discovered I was not automatically retired since disbarred PA attorneys are not automatically disbarred and may have an office to practice before the Federal courts. *See, Theard v. United States*, 354 U.S. 278, 282 (1957); *Selling v. Radford*, 243 U.S. 46, 49 (1917), *Frazier v. Heebe*, 482 U.S. 641, 648 n.7 (1987); *also see, In re Surrick*, 338 F.3d 224, 231 (3d Cir. 2003), (disbarment by the [s]tate does not result in automatic disbarment by the federal court." *In re Ruffalo*, 390 U.S. 544, 547, 88 S.Ct. 1222, 20 L.Ed.2d 117 (1968)). *Surrick v. Killion*, 449 F.3d 520, 530 (3d Cir. 2006), ("The question in this case is whether a state may prohibit an attorney admitted to the bar of a federal district court, but suspended from the state bar, from maintaining a legal office for the sole purpose of supporting a practice before the federal court.")

27. I was scared to draft this Motion for ECF filing rights and permission because I am concerned this Court was booby trapping me. I was scared this Court may be trapping me to entice me to divert time from other matters to dispose of me and my case to get out of work. This Court previously denied efileing rights not ripe to deny. I did not move the court for rights prior to its denial.

28. This Court knows I am prejudiced by lack of time while I fight multiple suits, poverty, religious objection to indebtedness and my assertion against involuntary servitude in violation of the 13th Amendment.

29. I am scared. The Courts are behaving like the wild wild west in the disciplinary matters, not acting within the scope of the Constitutional rule of law, or jurisdictional limits. The Delaware Supreme Court violated the Constitution, federal laws, and fired two court staff, colluded in fixing the original disciplinary proceeding by denying me notice and meaningful opportunity to be heard. The Delaware state Court did not afford me an opportunity to subpoena or call witness despite my motions to do so to conceal the fact the State Court eliminated witnesses and material evidence in my favor. The court sealed my pleadings necessary to my defense.

30. I am really freaked out. This Court filed another pro se party's medical records in my pleadings. Then, this court seemed to schedule notice of a hearing to get out of correcting the voluminous amount of misfiled documents DI 10-19. I attach and incorporate the pleadings from another matter as Exhibit F. Allowing me to file will save the Court time while safeguarding my right to be heard by accurately filed petitions. DI 13. (Exhibit G)

31. The fact the courts make mistakes or claimants allege misconduct does not destroy the courts, but maintains the rule of law by showing the public the Courts are not above the Constitution or correction too.

32. We need people staff and people judges. After all, the only reason why we have courts is people make mistakes and sometimes misbehave by covering up misconduct for convenience, position, power or profit.

33. I oppose disciplinary proceedings of federal judges. I believe the only fair forum to address judicial misconduct is 1. In cases or controversies or 2 impeachment.

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

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

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

37. As a Christian I believe God when he teaches it is sin when judges show favor towards the state's agents or partners by doing what government's counsel commands, in violation of the 5<sup>th</sup> Amendment. That is not fair but creates a fixed system bent towards injustice by sacrificing individual claims and constitutional freedoms towards slavery not freedom to the

government and government backed foreign and private partners. I seek to preserve the integrity of the courts in my other cases. I also seek to defend my religious belief in Jesus in Kelly v Swartz a civil rights case.

38. Pursuant to Fed. R. App. P. 2 for good cause this Court may “suspend any provision of these rules in a particular case and order proceedings as it directs.”

39. I argue alleviating a substantial economic burden that potentially causes an obstacle to my access to the courts is good cause.

40. I also have religious-objections against indebtedness. I am a Christian. I believe in Jesus Christ. Jesus teaches you can only serve one master God or money. I choose God. Artificial indebtedness compels people to worship money as God, and savior in place of God.

41. I pray this Court does not require I violate my religious beliefs for the mere opportunity, not guarantee on being heard on appeal from the Delaware Supreme Court in Kelly v PA ODC, or in my civil rights case, 21-3198.

42. The Third Circuit Court kindly granted me an exemption for PACER costs in Kelly v Swartz, NO 22-3198 and on appeal at 22-3372. In addition, the Delaware District Court similarly afforded me ECF access and an exemption from PACER costs.

43. My PACER Account Number 6975241.

44. I respectfully request an exemption be applied for the duration of this case up until appeal or the time has appealed to the US Supreme Court or until January 20, 2024, whichever is longer.

45. I thank the Court and its staff for its help.



46. I agree to send PACER the attached Order or any Order this Court files to exempt PACER fees in this case, should this Court grant my plea.

47. I have been experiencing computer trouble. Not all browsers permit me to print or download e-served documents. I attempted to download e-served documents for this matter, but discovered they were no longer available since the browser failed or was incompatible.

48. The costs relating to PACER for second looks are unaffordable. 49. The original disciplinary order from Delaware from which the reciprocal suit by the Eastern District is based adjudicated me inactive/disabled. 50. The Delaware Order prevents me from working as an attorney. I am unable to seek employment at my former law firm where I would be performing real estate settlements. My former law firm is a great law firm McDonnell and Associates. The people there care about their clients and employees above money. 51.

I am impoverished and am not allowed to work in my profession of choice.

52. Even if the Order in DE is overturned, the Eastern District's Order may prevent my former firm from rehiring me. They work with others who perform their due diligence to protect clients and the large amounts of money in real estate transactions.

53. The firm does thorough background checks.

54. Having any blemish remaining on my license affecting my credibility or appearance of credibility may deem me unemployable.

55. Since I am poor and unemployed, I do not have money to pay fees. My parents have indicated they have decided to cut off or reduce my inheritance should they die, because of this litigation.

56. It is against my religious belief to go into debt, especially given I am not permitted to work for pay as an attorney in DE. (See, Bible Romans 13:8. “Owe nothing to anyone, but to love them”).

57. I request this Court grant me an exemption in order not to compel me to violate my religious beliefs in exchange for access to the courts in defense of my exercise of my First Amendment liberties, my license and related interests.

58. I respectfully request this Court grant me an exemption of PACER fees (1). in order not to compel me to violate my religious beliefs in exchange for access to the courts or (2). suffer an economic substantial burden so great as to deny me access to the courts in defense of my First Amendment liberties, license and related interests and (3). to prevent government compelled involuntary servitude to sin by making money savior in place of God.

59. It is my religious belief people should buy and sell by free choice, not by forced choice by artificially man-made government compulsion to be exploited by government backed private or foreign partners in a fixed not free economy. 60. I argue compelled debt in my case not only violates the 13th Amendment against involuntary servitude, but violates my private, personal individual religious belief in Jesus, God the father and the holy spirit as guide and God, not money by government compelled force. US Amend I, XIII.

61. I believe the plans under the UN, G-7 and global agenda violates my religious belief against indebtedness to money and material gain as God at a greater more horrific level, and violates my First Amendment right to religious belief. Creating precedent in this case, may prevent the elimination of not only my Constitutional liberty but the liberty of all Americans protected under Constitutional law. I hope to somehow tie that in to other litigation.

62. I believe people teach a lie, despite their ignorance of truth, and sin against God and man for teaching government is a social contract by the people to government. It is a forced choice upon the populace without a meeting of the minds or consideration. The people's souls are not to be sold by the government through the government backed private or foreign partners to be sacrificed to gain the world. Leaders are charged with caring for the people and protecting their liberty. Misleaders seek to control and exploit for material gain a no longer free people. It is written Mark 8:36, "What profits a man to gain the whole world [by money or material gain only to lose his eternal life in the second death to be no more.]"

63. The contract of government is by those governing who agree to more limited liberty in exchange with the authority to serve, govern and guide.

64. I seek to preserve our government with honesty by seeking to unrig the system of corruptions within by requiring the Courts place checks on the other branches of power and their own when those within branches exceed their Constitutional authority and violate the Constitutional laws that protect the people they are charged to serve, not exploit.

65. There appears to be a societal peer pressured attack against the courts to create lawlessness under the guise of freedom. There appears to be an attack to dismantle the government as opposed to unrig unjust practices which exceeds Constitutional laws that protect the common people.

66. I seek to preserve our system of government by upholding the Constitution and asking the courts to guide those misguided by lusts under the belief of laws.

67. With regards to my plea, the Government is not permitted to discriminate based on religious belief by denying me access to the courts by requiring my enslavement to debt making money savior in place of Jesus. Matthew 6:24

68. Given my poverty, any fee, including PACER fees create a substantial burden to my access to the courts and my religious-belief against indebtedness. 69. I am a Christian, a child of God, a believer of Jesus Christ. I believe people sin leading to damnation in the fires of hell by debt, focusing their mind, and life towards the aim of gathering money as savior in place of God's desires.

70. I believe people sin for using money to control others, to do their will, or the government's will by reward, or punishment in terms of fines because I believe this misleads people to hell by making money master, God and guide. 71. The original disciplinary order caused multiple reciprocal law suits. These additional law suits have increased costs, and caused me to panic, lose sleep, and gain baby white hairs. If I expend all my resources in terms of time, paper and other costs, by defending all cases simultaneously only to run out of resources, I would be prevented from defending my exercise of fundamental rights in any case to its conclusion.

72. A lawyer's right, my right to pursue my profession constitutes a property protected by the due process clause of the 5<sup>th</sup> Amendment, and of which I cannot be deprived for any whimsical, capricious or unreasonable cause, including the state's disagreement with my religious-political beliefs or poverty or pro se animus.

73. I must be afforded access to the courts to defend my license to practice law from being placed on inactive disabled but for my faith in Jesus Christ, and exercise of fundamental

rights. My First Amendment right to petition must be conditioned on elimination of my other asserted rights against slavery in violation of the 13<sup>th</sup> Amendment, and religious belief and exercise of belief in violation of the First Amendment.

74. Please grant me access to ECF and a PACER exemption until conclusion of this case.

75. I am utterly poor. The costs relating to filing by paper or PACER fees create a substantial burden and obstacle to my access to the Courts in contravention to my First Amendment right to access to the Courts applicable to the Federal Courts via the Equal Protection component of the 5th Amendment, for me, a member of class of one due to religious beliefs against incurring debt combined and due to utter poverty. *See, Abdul-Akbar v. McKelvie*, 239 F.3d 307, 317 (3d Cir. 2001) (“This requires us first to determine whether Appellant is a member of a suspect class or whether a fundamental right is implicated.”); *Lewis v. Casey*, 518 U.S. 343, 370 (1996) “[A]t all stages of the proceedings the Due Process and Equal Protection Clauses protect [indigent persons] from invidious discriminations.”)

76. “Because this case implicates the [Constitutionally protected] right of access to the courts, [ and First Amendment rights to free speech, religious belief, association and exercise of religious beliefs] the government’s disparate treatment towards me, based on poverty, is still unconstitutional under a strict scrutiny basis test.” *Citing, Tennessee v. Lane*, 541 U.S. 509, 533 n.20 (2004).

77. The Supreme Court noted, “There can be no equal justice where the kind of trial a man gets depends on the amount of money he has.” *Lewis v. Casey*, 518 U.S. 343, 370 (1996).

78. PACER costs and costs associated with paper filing, as applied, violate my religious beliefs, religious practices and religious exercise against incurring debt, and costs, as

applied. I seek protections under the 5th Amendment's Equal Protection component, as a party of one, with unique religious beliefs to gain access to the courts to defend my exercise of 1st, and 5th Amendment liberties.

79 I expected to rejoin my old law firm after standing up for something more important than money in *Kelly v Trump*, my free exercise of religion, exercise of religious and political belief, exercise of religious and political speech, and association as a party, attorney, democrat, and Christian without government incited persecution, but for my exercise of fundamental rights.

80. The Delaware Order against me and the reciprocating Order creates a government incited economic substantial burden upon me, and prejudices me by forcing me into a maintained state of poverty by preventing me from seeking to get my former position back at my old law firm as an attorney, or any work as a law firm, and harms my reputation to make me less attractive to employers.

81. While, poverty is not a suspect class, my right to meaningful access to the courts, despite the inherent burden of poverty, and my religious beliefs and strongly held religious exercise relating to my religious belief against indebtedness are protected. In addition, fundamental rights are implicated.

82. So, the Court must have a compelling reason to deny my request for an exemption of the PACER fees to protect my access to the courts to defend the exercise of my fundamental rights including my religious beliefs narrowly tailored to meet the important justification.

83. There is no compelling reason to deny my request for ECF access and for a PACER fee waiver, especially since it will prevent my need to contact the court should the one free glance fail to save.

84. Nor is any justification narrowly tailored to meet any compelling reason. The Court may grant an exemption without any burden upon the court. This will alleviate needless burdens upon the court by preventing the need to call the court to confirm documents were received and filed or to correct Court staff's misfiling of documents. DI 13.

85. I face an undue burden should this court deny my request, including loss of my First Amendment rights, property interest in my license, loss to my reputation, other damages, loss of employment opportunities and a substantial burden to my access to the courts.

86. There is no opposing counsel to request a position on.

87. I write under great duress, with haste and apologize for any typos.

Wherefore, I pray this Court grants this Motion.

June 20, 2023

Respectfully submitted,

/s/Meghan Kelly

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Not acting as an attorney on behalf of  
another, defending my private first  
amendment belief in Jesus not money  
and mammon as God.

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