

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF MEGHAN KELLY’S 77th AFFIDAVIT UPDATE

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

1. I submitted the attached Motion with the US Supreme Court Kelly v PA ODC, No. 22A 478, as Exhibit 1.
2. I sent an Email to opposing counsel and Robert Meek attached hereto as Exhibit 2 wherein I stated:

“No. 22-7695 Kelly v PA ODC Motion to correct the record and to preserve 1st Amendment waiver to petition
 From: Meg Kelly (meghankellyesq@yahoo.com)
 To: rmeek@supremecourt.gov; harriet.brumberg@pacourts.us;
 anthony.sodroski@pacourts.us
 Cc: meghankellyesq@yahoo.com; zi-xiang.shen@delaware.gov;
 supremectbriefs@usdoj.gov
 Date: Wednesday, September 6, 2023 at 10:14 AM EDT
 Good morning,

Attached please find a motion to correct the record, wherein I request the Court also refrain from answering Senator Whitehouse's September 4th petition

2. Exhibit A Press releases from the Federal Reserve showing the reserve requirement was reduced from 10 Percent to zero creating conditions that will make banks fail should people request their deposits
3. Exhibit B Excerpts from the World Economic Forum Founder's Klaus Schwabb and Thierry Mallerett's Book The Great Narrative regarding elimination of the dollar and the Central bank's judicial power unrestrained by the courts and limited by their "own imagination"
4. Exhibit C Whitehouse's complaint against Justice Alito.

Robert Meek, I do not have money or stamps to respond to amicus briefs. I had to ask the courts to consider saving itself and the rule of law to save me and the world herein instead of potentially fighting congress in my other two cases by amicus briefs.

I am acting hastily and even imperfectly to assert my rights in order not to waive them. I would rather do something in the face of grave threats not only to myself but to the entire world than do nothing. I am sorry if I let this Court down since I am such a poor typist and write in haste.

On an aside my mom and dad contracted covid over the Labor Day weekend. They live in Florida. I live in Delaware, but my mom was intending to visit on the 20th. I am a bit scared I may get sick should she still visit me Robert Meek. I will keep you and all opposing counsels informed should there be a risk.

I am also concerned they may die since they are very old. My dad has a surgical procedure scheduled September 15th. They behave like they are superman because they took the vaccine. They misbehave and are not super beings immune from sickness and death. I am quite sad they do not feel well because I love them.

On an aside, I am not sick, but I am dangerously dehydrated due to the surgery I had as a youth and assert my religious exercise to live and not die for the vanity of people in all courts. Every month I lose five pounds of water weight and I collapse if I am not afforded time to drink gallons not cups of water. It is a matter of life and death for me for more than 20 years. I believe people sin by referring people to doctors, or blindly telling people to pay or professional or pay for a product. I have religious objections to healthcare and science when they are made demi-gods.

I believe people sin leading to hell when they tell others to blindly trust the experts, professionals, products or man's creation technology, science should they not repent. See Romans 1:25. I believe it is idolatry making man and man's creation God in place of God. It serves what I believe is the mark of the beast business greed, sacrificing people or free will for the forced will at what is profitable at the cost of human life, liberty or health under the lie of saving it by making people and their products above court correction when they kill, steal or destroy for the bottom line. It is basically barbaric human sacrifice for material gain, same as throwing people in a volcanoes under the belief in a lie it will help crops.

I prefer the people think things out, not blindly trust professionals dumbed down b standardization or training who do not care to think outside the standards when they may harm human life, liberty or health. It is blindness Jesus speaks of blinded for money for a paycheck to provide for their own or convenience. This dumbing down by standards prevents people from seeing clearly based on truth not a barter or exchange by exchanging every freedom for material gain by standardization.

Thank you for understanding I keep myself separate by not doing what others do when I believe it is sin.

Thank you.

With sadness and yet hope,
Meg
Meghan Kelly
34012 Shawnee Dr
Dagsboro, DE 19939
(302) 493-6693
meghankellyesq@yahoo.com”

3. Per the attached exhibit 3 postal tracking, the Honorable US Supreme Court and PA ODC is expected to receive the motion on Friday, September 8, 2023. I already put in an in forma pauperis on the record. So, I think that will allow consideration of the motion on the date of the conference September 26, 2023. I believe there are more than 100 cases for consideration that day. I may have to file a motion for reconsideration should the court reject hearing my petition.

4. If the US Supreme Court doesn't rule PA ODC is without jurisdiction and the case is not ripe, PA ODC will likely sue me again. Why do I believe this? He doesn't like my inconveniencing unstandardized arguments against the disciplinary rules, even PA's disciplinary rules which eliminate citizen lawyers' Constitutional rights to religious exercise or belief which do not conform to the standards in exchange for what I argue and believe is the mark of the beast, the mark of those without eternal life, sacrificing humans or liberty for mammon, even convenience. I believe Jesus is not kidding when he says you cannot serve God and mammon. Matthew 6:24. I believe the Constitution protects me from being sacrificed for moth and rust.

5. I am quite dehydrated, and not feeling well now due to surgery. I do not have covid. Yet, I took a test for precaution. It is negative.

Thank you for your time and consideration.

Respectfully submitted,

Dated 9/6/23

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

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

Dated: 9/6/23

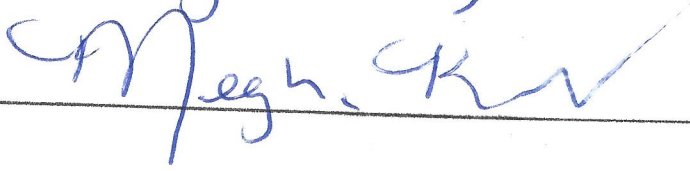
Meghan Kelly (printed)
 (signed)

Exhibit 1

No. 22-7695

Related Application No. 22A981

IN THE SUPREME COURT OF THE UNITED STATES

In the Matter of Meghan Kelly in the Supreme Court of Pennsylvania
Meghan M. Kelly, Petitioner

V

Office of Disciplinary counsel, aka Pennsylvania Disciplinary Counsel
On Petition for Writ of Certiorari to the Supreme Court of Pennsylvania, Western District of PA,
Case Number 2913 DD3

Petitioner Respondent Meghan Kelly's Motion to Correct an error in Kelly's petition for writ of certiorari in Kelly v Pennsylvania Office of Disciplinary Counsel No. 22-7695

Meghan Kelly, Esquire pursuant to Rule 21 respectfully requests leave to correct an error in the petition for writ of certiorari in Kelly v Pennsylvania Office of Disciplinary Counsel No. 22-7695, and further requests this Court allow her an opportunity to address the issue of whether the US Supreme Court may be corrected outside of the purview of the Constitutional limits of 1. Cases and controversies or 2. Impeachment by abstaining from addressing Whitehouse's request for discipline, dated 9/4/23 so as to deprive me of my 1st Amendment right to petition for relief in cases and controversies.

1. On February 28, 2023 I submitted a petition to appeal the Pennsylvania Supreme Court's decision based on lack of subject matter jurisdiction. I have been retired and have remained retired at all times since the alleged misconduct for which my Delaware license was placed on inactive disabled this reciprocal disciplinary order is based. The PA rules do not permit jurisdiction at this time. (See, 204 Pa. Code § 85.3(a) and Pennsylvania's Rules of Disciplinary Enforcement (Pa.R.D.E.) Rule 201 concerning the scope of the PA ODC's and the Pennsylvania Supreme Court's subject matter jurisdiction) The case is not ripe unless and until I petition to place my retired license to active license. (See, Pa.R.D.E. Rule 218 (a)(2) regarding

the process I would have to go through to make the case ripe by requesting restatement of my active license to practice law out of retirement).

2. It has come to my attention recently I misinformed the Court concerning FedNow.

In the first two paragraphs on page 12 I wrote:

“The new economic model started July 1, 2023 under Fed Now will charge every person with a bank account 25 dollars a month, and pennies for each transaction. The banks will not pay the \$25 fee, but will push it on the consumers of money as a commodity.

This artificial debt creates slavery differently. The 25 fee is discounted in 2023, but is scheduled to be convened 2024. I understand the fees for each transaction are pennies now, but will be increased to indebt the government and the people to be enslaved to the central banks.”

3. The \$25 fee is not charged to every person with a bank account. The fee is charged to the bank for its own account number. I am sorry for providing incorrect information to the Court, and write to correct myself.

4. The error was inadvertent. I was panicking because the Federal Reserve reduced Reserve requirements from 10 percent to 0 since 2020 per the attached Exhibit A. I was scared a bank run would occur like in 1907-08. If people had to pay \$25 a month starting January 1, 2024 they would likely seek to reduce the amount of accounts to reduce the amount of fees only for people to discover the fiat money was not available due to the reduction in fiat reserves since 2020.

5. My horror increased as I realized Saudi Arabia was exiting the Swift payment system to enter the payment system in BRICS model (Brazil, Russia, India, China and South Africa’s payment system), on January 1, 2024.

6. I expect hyper-inflation with Saudi Arabia withdrawing support of the Petro-dollar effective January 1, 2024. Yet, I was super worried should customers be charged 25 dollars a month. I was incorrect.

7. Per the attached Exhibit B, I am also concerned about the elimination of fiat currency to eliminate the power of the courts to judge to be replaced by Central banks, and down the line to businesses and charities.

8. Attached, please find Sheldon Whitehouse's complaint against Justice Alito, dated September 4, 2023 with frivolous arguments concerning the Judicial Conduct and Disability Act which does not apply to the US Supreme Court. As I stated in my petition, the Judiciary is the only branch that gives us freedom by the means of a democracy in our democratic republic. The other two branches give us a Republic in our democratic republic and by nature are partial and politically biased requiring ethical standards which are not required to tame the impartial courts.

9. Whitehouse's argument, "the bill would update judicial ethics laws to ensure the Supreme Court complies with ethical standards at least as demanding as in other branches," overlooks the purpose of restraining inherently partial branches as opposed to maintaining the impartial branch by maintaining its independence of the fickle fads of the masses. (Exhibit C)

10. Congress does not tell us what the law is as Whitehouse appears to seek to do in violation of separation of powers. "It is emphatically the province and duty of the judicial department to say what the law is. Those who apply the rule to particular cases, must of necessity expound and interpret that rule." *Marbury v. Madison*, 5 U.S. 137, 177, 2 L. Ed. 60 (1803); also see,

11. Further, there may be no case as Whitehouse alleges as I seek this Court to rule in two different cases that the US Supreme Court may not be disciplined outside the purview of the Constitution prior to any attempt to pass the act Whitehouse seeks to pass, which would be void as outside the scope of his Constitutional power or jurisdiction.

12. This Court in *Ex Parte McCordle*, 74 U.S. 506 (1868) held:

“The appellate jurisdiction of this court is conferred by the Constitution, and not derived from acts of Congress; but is conferred "with such exceptions, and under such regulations, as Congress may make;" and, therefore, acts of Congress affirming such jurisdiction, have always been construed as excepting from it all cases not expressly described and provided for.”

13. “By words of the Constitution, equally plain, that judicial power is vested in one Supreme Court. This court, then, has its jurisdiction directly from the Constitution, not from Congress.” *Id at 507*. “This court, then, has its jurisdiction directly from the Constitution, not from Congress. The jurisdiction being vested by the Constitution alone, Congress cannot abridge or take it away.” *Id*.

14. I request this Court please abstain from addressing the complaint submitted to you attached hereto as Exhibit C against Justice Alito. I note, Justice Kagan also spoke for regulations in the news, and all of the arguments contained herein may also be twisted to be used against her. While adversary opinions are not proper by either of these two justices, they are without authority of the rule of law, mere opinions. Disciplinary complaints are an improper form to clarify issues under the Constitution.

15. I believe the complaint is a trap your honors to compel the Court to eliminate what is not theirs to barter away, the 5th Amendment right against self-incrimination by compelled incrimination of federal judges and more importantly the 5th Amendment right to a fair and impartial federal judiciary, as applied to me as a unique party of one with special arguments on the record in two cases based on religious-beliefs and exercise, and as applied to all citizens from a no longer free and independent but partial judiciary to whomever regulates its seats through self-regulation or third party regulation.

16. I am quite distraught that Chief Justice Roberts may answer this hastily as to deprive me of a fair opportunity to make arguments in cases and controversies in two matters

Kelly v Swartz, No 23A10,0 and *Kelly v US Eastern District of PA*, No 23A144. I already apprised this Court in my Applications I intended to argue the issue as to whether the US Supreme Court should only be corrected within the purview of the Constitutional limits of 1. cases and controversies and 2. impeachment.

17. I am so scared the entire court may succumb to public fickle pressure to eliminate Constitutional rights by allowing regulation of a no longer impartial court. I believe this will expedite the scheme to eliminate the courts down the line that restrains entities from enslaving, oppressing, killing, stealing and destroying human life, liberty and health to sustain power, position, profit under the guise of sustaining the world.

18. Your Honors I ask you please grant me the opportunity to exercise the First Amendment right to petition on this issue in two cases where I argue the Federal courts and federal judges may only be corrected within the purview of the Constitutional limits of 1. Cases and controversies and 2. Impeachment, without vitiating by hastily responding to Whitehouse.

19. “It is a settled and invariable principle, that every right, when withheld, must have a remedy, and every injury its proper redress.” *Marbury v. Madison*, 5 U.S. 137, 147 (1803). It is not fair that Congress may be above the law, and separation of powers issues, and eliminate my right to petition the court in a case or controversy about the same issue where my remedy may be lost.

Thank you for your time and consideration.

September 6, 2023

Respectfully Submitted,
/s/Meghan Kelly
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US Supreme Court Number 283696

Exhibit A

Policy Tools

Reserve Requirements

As announced on March 15, 2020, the Board reduced reserve requirement ratios to zero percent effective March 26, 2020. This action eliminated reserve requirements for all depository institutions.

- [FAQs](#)

The following content explains the Board's authority to impose reserve requirements and how reserve requirements were administered prior to the change in reserve requirement ratios to zero. Additional detail on this reserve requirement regime can be found in the archived Reserve Maintenance Manual: [HTML](#) | [PDF](#).

The Federal Reserve Act authorizes the Board to establish reserve requirements within specified ranges for purposes of implementing monetary policy on certain types of deposits and other liabilities of depository institutions.

The dollar amount of a depository institution's reserve requirement is determined by applying the reserve requirement ratios specified in the Board's Regulation D (Reserve Requirements of Depository Institutions, 12 CFR Part 204) to an institution's reservable liabilities (see table of [reserve requirements](#)). The Federal Reserve Act authorizes the Board to impose reserve requirements on transaction accounts, nonpersonal time deposits, and Eurocurrency liabilities.

Prior to the change effective March 26, 2020, reserve requirement ratios on net transactions accounts differed based on the amount of net transactions accounts at the depository institution. A certain amount of net transaction accounts, known as the "reserve requirement exemption amount," was subject to a reserve requirement ratio of zero percent. Net transaction account balances above the reserve requirement exemption amount and up to a specified amount, known as the "low reserve tranche," were subject to a reserve requirement ratio of 3 percent. Net transaction account balances above the low reserve tranche were subject to a reserve requirement ratio of 10 percent. The reserve requirement exemption amount and the low reserve tranche are indexed each year pursuant to formulas specified in the Federal Reserve Act (see table of [low reserve tranche amounts and exemption amounts since 1982](#)).

For more history on the changes in reserve requirement ratios and the indexation of the exemption and low reserve tranche, see the [annual review table](#). Additional details on reserve requirements can be found in this *Federal Reserve Bulletin* article (119 KB PDF), the appendix of which has tables of historical reserve ratios.

Press Release

November 29, 2022

Federal Reserve Board announces annual indexing of reserve requirement exemption amount and low reserve tranche for 2023

For release at 3:00 p.m. EST

[Share](#)

The Federal Reserve Board on Tuesday announced technical details related to reserve requirements for depository institutions. The annual indexation and publication of these amounts are required by law and does not indicate a change in depository institutions' reserve requirements, which will remain zero.

If reserve requirement ratios were not zero, these amounts would be used to determine the different ranges of reserve requirement ratios that could apply, depending on the amount of transaction account balances at a depository institution. The reserve requirement exemption amount will be set at \$36.1 million, up from \$32.4 million in 2022, and the low reserve tranche will be set at \$691.7 million, up from \$640.6 million in 2022. The adjustments to both of these amounts are derived using formulas specified in the Federal Reserve Act.

The adjustments will apply beginning January 1, 2023.

For media inquiries, please email media@frb.gov or call 202-452-2955.

Federal Register notice: Reserve Requirements of Depository Institutions

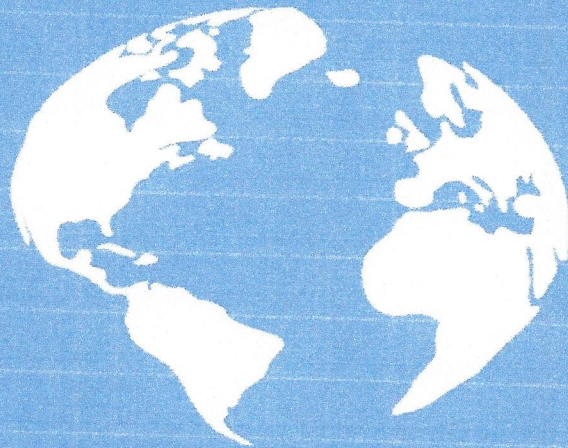
Last Update: December 09, 2022

Exhibit B

pp

THE GREAT NARRATIVE

For a Better Future



KLAUS SCHWAB
THIERRY MALLERET

FORUM PUBLISHING

**THE
GREAT
NARRATIVE**

Klaus Schwab
Thierry Malleret

FORUM PUBLISHING

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8

(4) The strong and rapid emergence of cryptocurrencies, and more broadly fintech, entangles economics with technological innovation in such a complex way that it makes it hard to identify how the causality runs and what some of the potential applications and policy implications might be. Analysts and media reports give the impression that national currencies already compete with cryptocurrencies since individuals and institutions can hold digital wallets with whichever crypto asset they chose. As Parag Khanna states:

We are about to enter an age of global monetary competition, where national currencies must earn their place in someone's wallet portfolio every hour of every day, even among citizens of their own countries. The digital version of the Japanese yen will be plunged into head-to-head global competition with the Swiss franc, the Brazilian real, and any other asset with an open capital account, including Bitcoin. Everyone becomes a foreign-exchange trader, all the time, and only the best national currencies – or cryptocurrencies – are ever held by anyone.³⁴

Elimination of fiat \$ to trackable money coins of the pleasure of banks.

It might be that government-supported cryptocurrencies compete with each other, as hinted at by Khanna. If they do so, they'd blur the line with fiat money and would change the financial system in terms of financial stability and traditional monetary policy in a way that nobody can yet predict.

Currently, both monetary authorities and private institutions issue cryptocurrencies as viable, mainstream payment vehicles. Central banks and governments experiment with "govcoins", or Central Bank Digital Currencies, while private "sponsors" develop "stablecoins" – cryptocurrencies whose value is pegged to the value of an underlying asset. The trajectory and endgame for govcoins and stablecoins remain unknown, but their respective fates may ultimately be decided by adoption and above all regulation (the power of the state). The only certainty: their economic, societal and possibly geopolitical impacts will be considerable. Will physical cash still be accepted? Will cryptocurrencies pervade our privacy? How will they redefine the role of technology in our daily lives? What will their impact be on the effectiveness of monetary policy? Could they foster greater financial inclusion? Could cryptocurrencies advance environmental objectives and the policies that support them? Could they be used to accelerate the demise of the US dollar? Will

They predict it, they plan it in their agendas.

The elimination of the dollar is discussed in other WEF documents (sad face)

future. Their original ideas translate into narratives that produce models which in turn influence behaviour and help construct the future. Ultimately, they become instruments of policy and project market power. By way of demonstration, four innovative projects, or sets of projects, are described, all different from each other but all pertaining to the environmental sector (this macro category was chosen arbitrarily because it is where the stakes are the highest). Just a few years ago, all these ventures were unknown or in their infancy. Now, they are a collective testimony to the power of imagination of those who conceived them.

(1) Network for Greening the Financial System and beyond: Imagining new policies

The Network for Greening the Financial System (NGFS) is a group of 91 central banks and supervisors committed to mobilizing mainstream finance to support the transition towards a sustainable economy. It is investigating many bold financial innovations¹¹⁷ that could (and most likely will) one day revolutionize the way in which climate-related risks are accounted for in central banking and banking supervision. In short, alongside governments (which have a much broader and more effective range of tools and policies available to prevent and mitigate climate-related risks), central banks will adapt their monetary policy operational frameworks to reflect climate-related risks. This will involve the mitigation of balance sheet risks that stem from climate change and environmental degradation, but also the active support of the transition to a non-carbon, green economy. Imagining what form this might take and devising policy tools and instruments to get there is the task of the NGFS, and largely depends on how climate risks will affect the economy and financial system through a range of different transmission channels.¹¹⁸ The menu of options available is extensive and encompasses changes in all three most important policy fields of a central bank: credit operations, collateral policies and asset purchases. It is not the purpose of this book to delve into the technicalities of what this involves¹¹⁹ but, suffice to say, some of the options represent a radical departure from standard central bank operational policies. They are, in short, the product of central bankers' imagination.

Some ideas go into uncharted territory, well beyond the scope of what the NGFS is devising in terms of possible policies. Creating "carbon quantitative easing" policies is one of them. It's a novel, untested and somewhat outlier

The rule of law is the "product of the bankers' imagination" when bankers ~~gain more~~ & the worse off we are. This is terribly horrifying.

Exhibit C

United States Senate
WASHINGTON, DC 20510

September 4, 2023

The Honorable John G. Roberts, Jr.
Chief Justice of the United States
Chairman, Judicial Conference of the United States
Supreme Court of the United States
1 First Street NE
Washington, D.C. 20543

Dear Chief Justice/Chairman Roberts:

I write to lodge an ethics complaint regarding recent public comments by Supreme Court Justice Samuel Alito, which appear to violate several canons of judicial ethics, including standards the Supreme Court has long applied to itself.

I write to you in your capacity both as Chief Justice and as Chair of the Judicial Conference because, unlike every other federal court, the Supreme Court has no formal process for receiving or investigating such complaints, and asserted violations by justices of relevant requirements have sometimes been referred to the Judicial Conference and its committees. I include all justices in carbon copy because I am urging the Supreme Court to adopt a uniform process to address this complaint and others that may arise against any justice in the future.

The recent actions by Justice Alito present an opportunity to determine a mechanism for applying the Judicial Conduct and Disability Act to justices of the Supreme Court. Nothing prohibits the Court or the Judicial Conference from adopting procedures to address complaints of misconduct. The most basic modicum of any due process is fair fact-finding; second to that is independent decision-making.

Background

Some of the background facts here were related by members of the Senate Judiciary Committee who signed a letter to you dated August 3, 2023.¹ As that letter explains, the *Wall Street Journal* on July 28, 2023, published an interview with Justice Alito conducted by David Rivkin and James Taranto. Justice Alito's comments during that interview give rise this complaint.² The interview had the effect, and seemed intended, to bear both on legislation I authored and on investigations in which I participate.

During the interview, Justice Alito stated that “[n]o provision in the Constitution gives [Congress] the authority to regulate the Supreme Court—period.”³ Justice Alito's comments

¹ Letter from Sen. Richard J. Durbin et al., Senate Committee on the Judiciary, to Hon. John G. Roberts Jr., Chief Justice of the United States (Aug. 3, 2023).

² David B. Rivkin & James Taranto, Opinion, *Samuel Alito, the Supreme Court's Plain-Spoken Defender*, WALL ST. J. (July, 28, 2023), https://www.wsj.com/articles/samuel-alito-the-supreme-courts-plain-spoken-defender-precedent-ethics-originalism-5c3e9a7?st=4765zed61auy3j2&reflink=desktopwebshare_permalink.

³ *Id.*

appeared in connection to my Supreme Court Ethics, Recusal, and Transparency Act, which the Senate Judiciary Committee had advanced just one week before the publication of this interview.⁴ That bill would update judicial ethics laws to ensure the Supreme Court complies with ethical standards at least as demanding as in other branches of government.

Justice Alito's comments echoed legal arguments made to block information requests from the Senate Judiciary Committee and the Senate Finance Committee, on both of which I serve. Those arguments assert (in my view wrongly) that our constitutional separation of powers blocks any congressional action in this area, which in turn is asserted (also wrongly, in my view) to block any congressional investigation. Sound or unsound, it is their argument against our investigations, as reflected in the letter appended hereto. The subjects of these committee investigations are matters relating to dozens of unreported gifts donated to justices of the Supreme Court.

As the author of the bill at issue, and as the only Senator serving in the majority on both investigating committees, I bring this complaint.

Improper Opining on a Legal Issue that May Come Before the Court

On the Senate Judiciary Committee, we have heard in every recent confirmation hearing that it would be improper to express opinions on matters that might come before the Court. In this instance, Justice Alito expressed an opinion on a matter that could well come before the Court.

That conduct seems indisputably to violate the Code of Conduct for United States Judges. Canon 1 emphasizes a judge's obligation to "uphold the integrity and independence of the judiciary"; Canon 2(A) instructs judges to "act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary"; and Canon 3(A)(6) provides that judges "should not make public comment on the merits of a matter pending or impending in any court." These canons help ensure "the integrity and independence of the judiciary" by requiring judges' conduct to be at all times consistent with the preservation of judicial impartiality and the appearance thereof.⁵

The Court's *Statement of Ethics Principles and Practices*, "to which all of the current members of the Supreme Court subscribe,"⁶ concurs. That document makes clear that, before speaking to the public, "a Justice should consider whether doing so would create an appearance of impropriety in the minds of reasonable members of the public. There is an appearance of impropriety when an unbiased and reasonable person who is aware of all relevant facts would doubt that the Justice could fairly discharge his or her duties."⁷ These same precepts are also enforced through the federal recusal statute, which requires all federal justices and judges to recuse themselves from any matter in which their impartiality could reasonably be questioned.⁸

⁴ *Id.*

⁵ Code of Conduct for U.S. Judges, Canon 1, Commentary.

⁶ Letter from John G. Roberts, Jr., Chief Justice of the United States, to Sen. Richard J. Durbin, Chairman, Senate Committee on the Judiciary (Apr. 25, 2023).

⁷ See *Statement on Ethics Principles and Practices* at 2:8-15, 2:19.

⁸ See 28 U.S.C. § 455(a), (b)(1).

Making public comments assessing the merits of a legal issue that could come before the Court undoubtedly creates the very appearance of impropriety these rules are meant to protect against. As Justice Kavanaugh pointed out, prejudging an issue in this manner is “inconsistent with judicial independence, rooted in Article III,” because “litigants who come before [the Court] have to know we have an open mind, that we do not have a closed mind.”⁹

Justice Alito and every other sitting member of the Supreme Court told the Senate Judiciary Committee during their confirmation hearings that it would be (in the words of Justice Alito) “improper” and a “disservice to the judicial process” for a Supreme Court nominee to comment on issues that might come before the Court.¹⁰ Justice Thomas said that such comments would at minimum “leave the impression that I prejudged this issue,” which would be “inappropriate for any judge who is worth his or her salt.”¹¹ Justice Kagan echoed those comments, telling the Committee it would be “inappropriate” for her to “give any indication of how she would rule in a case”—even “in a somewhat veiled manner.”¹² And Justice Kavanaugh explained that nominees “cannot discuss cases or issues that might come before them.” He continued: “As Justice Ginsburg said, no hints, no forecasts, no previews.”¹³

Justice Gorsuch made clear during his confirmation hearing that this rule applies to the precise topic on which Justice Alito opined to the *Wall Street Journal*:

Senator Blumenthal. Thank you. I also want to raise a question, talking about court procedure, relating to conflicts of interest and ethics. I think you were asked yesterday about the proposed ethics rules that have been applied to your court—

Judge Gorsuch. Yes.

Senator Blumenthal: [continuing]. To the appellate court, to the District Court, but not to the Supreme Court. Would you view such legislation as a violation of the separation of powers?

Judge Gorsuch. Senator, I am afraid I just have to respectfully decline to comment on that because I am afraid that could be a case or controversy, and you can see how it might be. I can understand Congress’ concern and interest in this area. I understand that. But I think the proper way to test that question is the prescribed process of legislation and litigation.¹⁴

⁹ Confirmation Hrg. on the Nomination of Hon. Brett M. Kavanaugh to be an Associate Justice of the Supreme Court of the United States Before the Sen. Comm. on the Judiciary, 115th Cong., at 123 (Sept. 5, 2018).

¹⁰ Confirmation Hrg. on the Nomination of Hon. Samuel Alito to be an Associate Justice of the Supreme Court of the United States Before the Sen. Comm. on the Judiciary, 109th Cong., at 517, 554 (Jan. 11, 2006).

¹¹ Confirmation Hrg. on the Nomination of Hon. Clarence Thomas to be an Associate Justice of the Supreme Court of the United States Before the Sen. Comm. on the Judiciary, 102d Cong., at 180 (Sept. 11, 1992); Confirmation Hrg. on the Nomination of Hon. Clarence Thomas to be an Associate Justice of the Supreme Court of the United States Before the Sen. Comm. on the Judiciary, 102d Cong., at 173 (Sept. 10, 1992).

¹² Confirmation Hrg. on the Nomination of Elena Kagan to be an Associate Justice of the Supreme Court of the United States Before the Sen. Comm. on the Judiciary, 111th Cong., at 80 (June 29, 2010).

¹³ Kavanaugh Hrg., *supra* note 9, at 123.

¹⁴ Confirmation Hrg. on the Nomination of Hon. Neil Gorsuch to be an Associate Justice of the Supreme Court of the United States Before the Sen. Comm. on the Judiciary, 115th Cong., at 334 (Mar. 22, 2017).

You, Justice Sotomayor, and Justice Barrett each expressly cited the canons of judicial ethics as the source of a nominee's obligation to refuse to comment on such matters.¹⁵ There seems to be no question that Justice Alito is bound by, and that his opining violated, these principles.¹⁶

Improper Intrusion into a Specific Matter

These principles apply broadly to any opining, on any issue that might perhaps come before the Court. But here it was worse; it was not just general opining, it was opining in relation to a specific ongoing dispute. The quote at issue in the article—"No provision in the Constitution gives [Congress] the authority to regulate the Supreme Court"—directly follows a mention of my judicial ethics bill. Justice Alito's decision to opine publicly on the constitutionality of that bill may well embolden legal challenges to the bill should it become law. Indeed, his comments encourage challenges to all manner of judicial ethics laws already on the books.

Justice Alito's opining will also fuel obstruction of our Senate investigations into these matters. To inform its work on my bill and other judicial ethics legislation, and oversee the performance of the statutory Judicial Conference in this arena, the Senate Judiciary Committee is investigating multiple reports that Supreme Court justices have accepted and failed to disclose lavish gifts from billionaire benefactors.¹⁷ Separately, the Senate Finance Committee is investigating the federal tax considerations surrounding the billionaires' undisclosed gifts to Supreme Court justices.¹⁸ Both committees' inquiries have been stymied by individuals asserting that Congress has no constitutional authority to legislate in this area, hence no authority to investigate. Justice Alito's public comments prop up these theories.¹⁹

As the author of the bill in question and as a participant in the related investigations, I feel acutely the targeting of this work by Justice Alito, and consider it more than just misguided or accidental general opining. It is directed to my work.

¹⁵ See *Confirmation Hrg. on the Nomination of John G. Roberts, Jr. to be Chief Justice of the United States Before the Sen. Comm. on the Judiciary*, 109th Cong., at 243 (Sept. 13, 2005) (citing Canon 3(A)(6) of the Code of Conduct for United States Judges); *Confirmation Hrg. on the Nomination of Hon. Sonia Sotomayor to be an Associate Justice of the Supreme Court of the United States Before the Sen. Comm. on the Judiciary*, 111th Cong., at 109 (July 14, 2009) (citing American Bar Association "rule on Code of Conduct"); *Barrett Confirmation Hearing, Day 2, Part 1*, C-SPAN Video, at 51:37–51:48 (Oct. 13, 2020) (citing "canons of judicial conduct").

¹⁶ Indeed, another member of the Court has expressed how seriously federal judges and justices take these statements to the Judiciary Committee. See *Kavanaugh Hrg.*, *supra* note 9, at 123 (statement of Judge Kavanaugh) ("[B]elieve me, judges do feel bound by what they said to this Committee.").

¹⁷ See, e.g., Letter from Sen. Richard J. Durbin, et al., Senate Committee on the Judiciary, to Harlan Crow (May 8, 2023),

<https://www.judiciary.senate.gov/imo/media/doc/May%208%202023%20letter%20to%20Harlan%20Crow16.pdf>.

¹⁸ See, e.g., Letter from Sen. Ron Wyden, Chairman, Senate Committee on Finance, to Harlan Crow (Apr. 24, 2023), <https://www.finance.senate.gov/imo/media/doc/Letter%20from%20Chairman%20Wyden%20to%20Harlan%20Crow%204.24.23.pdf>.

¹⁹ See, e.g., Letter from Harlan Crow to Sen. Ron Wyden, Chairman, Senate Committee on Finance (May 8, 2023), <https://s3.documentcloud.org/documents/23872250/harlan-crow-5-8-2023-letter-to-senate-finance.pdf>; Letter from Harlan Crow to Sen. Richard J. Durbin, Chairman, Senate Committee on the Judiciary (May 22, 2023), <https://s3.documentcloud.org/documents/23822173/harlan-crow-attorney-letter-to-senate-judiciary-committee.pdf>.

Improper Intrusion into a Specific Matter at the Behest of Counsel in that Matter

Compounding the issues above, Attorney David Rivkin was one of the interviewers in the *Wall Street Journal* piece, and also a lawyer in the above dispute. This dual role suggests that Justice Alito may have opined on this matter at the behest of Mr. Rivkin himself. Bad enough that a justice opines on some general matter that may come before the Court; worse when the opining brings his influence to bear in a specific ongoing legal dispute; worse still when the influence of a justice appears to have been summoned by counsel to a party in that dispute.

The timeline of the *Wall Street Journal* interview suggests that its release was coordinated with Mr. Rivkin's efforts to block our inquiry. Mr. Rivkin's interview with Justice Alito was reportedly conducted in "early July" 2023.²⁰ On July 11, Senate Judiciary Committee Chair Durbin and I sent a letter to Mr. Rivkin's client inquiring about undisclosed gifts and travel provided to justices.²¹ On July 20, the Senate Judiciary Committee voted to advance my judicial ethics bill mentioned above. (Notably, the Rivkin/Alito Congress-has-no-authority argument fared poorly in the committee that day, with no Republican rising to rebut the arguments against it.) On July 25, Mr. Rivkin by letter refused to provide the requested information on the purported ground that "any attempt by Congress to enact ethics standards for the Supreme Court would falter on constitutional objections."²² That response, appended hereto, was instantly published in *Fox News*.²³ Three days later, on July 28, the *Wall Street Journal* editorial page published the supportive opining from Justice Alito.²⁴

²⁰ Rivkin & Taranto, *supra* note 2.

²¹ Letter from Sens. Sheldon Whitehouse & Richard J. Durbin, Senate Committee on the Judiciary, to Leonard Leo (July 11, 2023).

²² Letter from David B. Rivkin, Jr. to Sens. Sheldon Whitehouse & Richard J. Durbin, Senate Committee on the Judiciary (July 25, 2023).

²³ Andrew Mark Miller, *Conservative activist rejects Senate Dem demand for help in Supreme Court probe: 'Political retaliation'*, FOX NEWS (July 25, 2023), <https://www.foxnews.com/politics/conservative-activist-rejects-senate-dem-demand-help-supreme-court-probe-political-retaliation>.

²⁴ Separately, Mr. Rivkin is also counsel of record in a case the Supreme Court recently agreed to hear, *see Moore v. United States*, No. 22-800—a matter that presents distinct ethical issues, including possible conflicts of interest, that should also be addressed. Questions abound about the extent of private access Justice Alito has afforded Mr. Rivkin, who has appeared before the Court numerous times, particularly while Mr. Rivkin's petition for a writ of *certiorari* was pending in *Moore*. Mr. Rivkin's efforts in *Moore* have been publicly supported by the *Wall Street Journal* Editorial Board, which has approved three pieces written by or involving interviews with Justice Alito in four months—including a piece by Justice Alito "prebutting" reporting on the non-disclosed gifts that Leonard Leo arranged for Justice Alito to receive. *See* Editorial Bd., Opinion, *Is a U.S. Wealth Tax Constitutional?*, WALL ST. J. (June 14, 2023), <https://www.wsj.com/articles/wealth-tax-ninth-circuit-moore-v-u-s-charles-and-kathleen-moore-supreme-court-constitution-6cdfba92>; James Taranto & David B. Rivkin Jr., Opinion, *Justice Samuel Alito: 'This Made Us Targets of Assassination'*, WALL ST. J. (Apr. 28, 2023), <https://www.wsj.com/articles/justice-samuel-alito-this-made-us-targets-of-assassination-dobbs-leak-abortion-court-74624e19>; Samuel A. Alito Jr., Opinion, *Justice Samuel Alito: ProPublica Misleads Its Readers*, WALL ST. J. (June 20, 2023), https://www.wsj.com/articles/propublica-misleads-its-readers-alito-gifts-disclosure-alaska-singer-23b51eda?mod=hp_opin_pos_3#cxrecs_s; Editorial Bd., Opinion, *A Wealth-Tax Watershed for the Supreme Court*, WALL ST. J. (June 27, 2023), <https://www.wsj.com/articles/supreme-court-moore-v-u-s-wealth-tax-patrick-bumatay-ninth-circuit-83610ed>.

Improper Intrusion into a Specific Matter Involving an Undisclosed Personal Relationship

On top of all this, the dispute upon which Justice Alito opined involves an individual with whom Justice Alito has a longstanding personal and political relationship. As my colleagues and I pointed out in our August 3 letter, “Mr. Rivkin is counsel for Leonard Leo with regard to [the Judiciary] Committee’s investigation into Mr. Leo’s actions to facilitate gifts of free transportation and lodging that Justice Alito accepted from Paul Singer and Robin Arkley II in 2008.”²⁵ Mr. Leo was Justice Alito’s companion on the luxurious Alaskan fishing trip in 2008 and facilitated the gifts to the justice of free transportation and lodging. Two years earlier, Mr. Leo’s political organization “had run an advertising campaign supporting Alito in his confirmation fight, and Leo was reportedly part of the team that prepared Alito for his Senate hearings.”²⁶

The timing of Justice Alito’s opining suggests that he intervened to give his friend and political ally support in his effort to block congressional inquiries. It appears that Justice Alito (a) opined (b) on a specific ongoing dispute (c) at the behest of counsel in that dispute (d) to the benefit of a personal friend and ally. Each is objectionable, and appears to violate, *inter alia*, Canon 2(B) of the Code of Conduct for United States Judges, which provides, “A judge should neither lend the prestige of the judicial office to advance the private interests of the judge or others nor convey or permit others to convey the impression that they are in a special position to influence the judge.”

Improper Use of Judicial Office for Personal Benefit

The final unpleasant fact in this affair is that Justice Alito’s opining, apparently at the behest of his friend and ally’s lawyer, props up an argument being used to block inquiry into undisclosed gifts and travel received by Justice Alito. At the end, Justice Alito is the beneficiary of his own improper opining. This implicates Canon 2(B) strictures against improperly using one’s office to further a personal interest: a justice obstructing a congressional investigation that implicates his own conduct.

The Senate Judiciary Committee’s investigation encompasses reports that Justice Alito accepted but did not disclose gifts of travel and lodging valued in the tens of thousands of dollars. Further investigation may reveal additional information that Justice Alito would prefer not come to light. The facts as already reported suggest that Justice Alito likely violated the financial disclosure requirements of the Ethics in Government Act.²⁷ Perhaps Justice Alito should also have recused himself as required by the recusal statute in a 2014 case involving a company owned by Paul Singer, one of the billionaires who attended and paid for his Alaskan fishing vacation.²⁸ Justice Alito’s public suggestion that these laws are unconstitutional as applied to the Supreme Court, and that Congress lacks authority to amend them or investigate their implementation or enforcement, appears designed to impede Senate efforts to investigate these and other potential abuses.

²⁵ Letter from Sen. Richard J. Durbin et al., *supra* note 1.

²⁶ Justin Elliott, Joshua Kaplan, & Alex Mierjeski, *Justice Samuel Alito Took Luxury Fishing Vacation With GOP Billionaire Who Later Had Cases Before the Court*, PROPUBLICA (June 20, 2023), <https://www.propublica.org/article/samuel-alito-luxury-fishing-trip-paul-singer-scotus-supreme-court>.

²⁷ See 5 U.S.C. §§ 13101, *et seq.*

²⁸ Elliott, Kaplan, & Mierjeski, *supra* note 26; see 28 U.S.C. § 455.

* * *

Conclusion

In the worst case facts may reveal, Justice Alito was involved in an organized campaign to block congressional action with regard to a matter in which he has a personal stake. Whether Justice Alito was unwittingly used to provide fodder for such interference, or intentionally participated, is a question whose answer requires additional facts. The heart of any due process is a fair determination of the facts. Uniquely in the whole of government, the Supreme Court has insulated its justices from any semblance of fair fact-finding. The obstructive campaign run by Mr. Rivkin and Mr. Leo, fueled by Justice Alito's opining, appears intended to prevent Congress from gathering precisely those facts.

As you have repeatedly emphasized, the Supreme Court should not be helpless when it comes to policing its own members' ethical obligations. But it is necessarily helpless if there is no process of fair fact-finding, nor independent decision-making. I request that you as Chief Justice, or through the Judicial Conference, take whatever steps are necessary to investigate this affair and provide the public with prompt and trustworthy answers.

Sincerely,



SHELDON WHITEHOUSE

Chairman

Senate Judiciary Subcommittee on
Federal Courts, Oversight, Agency Action, and
Federal Rights

Enclosure

- cc: The Honorable Samuel A. Alito, Jr., Associate Justice, Supreme Court of the United States
The Honorable Clarence Thomas, Associate Justice, Supreme Court of the United States
The Honorable Sonia Sotomayor, Associate Justice, Supreme Court of the United States
The Honorable Elena Kagan, Associate Justice, Supreme Court of the United States
The Honorable Neil M. Gorsuch, Associate Justice, Supreme Court of the United States
The Honorable Brett Kavanaugh, Associate Justice, Supreme Court of the United States
The Honorable Amy Coney Barrett, Associate Justice, Supreme Court of the United States
The Honorable Ketanji Brown Jackson, Associate Justice, Supreme Court of the United States
The Honorable Roslynn R. Mauskopf, Secretary, Judicial Conference of the United States

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July 25, 2023

VIA ELECTRONIC MAIL

The Honorable Richard Durbin
Chairman
Senate Judiciary Committee
United States Senate
221 Dirksen Senate Office Building
Washington, D.C. 20510

The Honorable Sheldon Whitehouse
Chairman
Subcommittee on Federal Courts, Oversight, Agency
Action, and Federal Rights
United States Senate
221 Dirksen Senate Office Building
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Re: Response to July 11, 2023 Letter to Leonard Leo

Dear Chairman Durbin and Senator Whitehouse:

We write on behalf of Leonard Leo in response to your letter of July 11, 2023, which requested information concerning Mr. Leo's interactions with Supreme Court Justices. We understand this inquiry is part of an investigation certain members of the Senate Judiciary Committee have undertaken regarding ethics standards and the Supreme Court. While we respect the Committee's oversight role, after reviewing your July 11 Letter, the nature of this investigation, and the circumstances surrounding your interest in Mr. Leo, we believe that your inquiry exceeds the limits placed by the Constitution on the Committee's investigative authority.

Your investigation of Mr. Leo infringes two provisions of the Bill of Rights. By selectively targeting Mr. Leo for investigation on a politically charged basis, while ignoring other potential sources of information on the asserted topic of interest who are similarly situated to Mr. Leo but have different political views that are more consistent with those of the Committee majority, your inquiry appears to be political retaliation against a private citizen in violation of the First Amendment. For similar reasons, your inquiry cannot be reconciled with the Equal Protection component of the Due Process Clause of the Fifth Amendment. And regardless of its other constitutional infirmities, it appears that your investigation lacks a valid legislative purpose, because the legislation the Committee is considering would be unconstitutional if enacted.

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The Committee's Inquiry Raises Serious First Amendment Concerns

Bedrock constitutional principles dictate that “no official, high or petty, can prescribe what shall be orthodox in politics, nationalism, religion, or other matters of opinion.” *W. Virginia State Bd. of Educ. v. Barnette*, 319 U.S. 624, 642 (1943). In the guise of conducting an investigation concerning Supreme Court ethics, the Committee appears to be targeting Mr. Leo because of disagreement with his political activities and viewpoints on issues pertaining to our federal judiciary. An investigation so squarely at odds with the First Amendment cannot be maintained.

Mr. Leo is entitled by the First Amendment to engage in public advocacy, associate with others who share his views, and express opinions on important matters of public concern. “[T]he freedom to think and speak is among our inalienable human rights.” *303 Creative LLC v. Elenis*, 143 S. Ct. 2298, 2311 (2023). Indeed, expressive activity of this kind is afforded the greatest protection possible. *See Connick v. Myers*, 461 U.S. 138, 145 (1983) (“[S]peech on public issues occupies the ‘highest rung of the hierarchy [sic] of First Amendment values,’ and is entitled to special protection.” (quoting *NAACP v. Claiborne Hardware Co.*, 458 U.S. 886, 913 (1982))). Yet Mr. Leo has, for years, been the subject of vicious attacks by members of Congress, specifically including members of the Committee majority, because of how he chooses to exercise his rights. In reference to Mr. Leo’s public advocacy work, for example, Senator Whitehouse has called Mr. Leo the “little spider that you find at the center of the dark money web.” Senator Sheldon Whitehouse, Remarks on the Floor of the United State Senate (Sept. 13, 2022). Similar remarks from Senator Whitehouse and others are too numerous to recount.

This campaign of innuendo and character assassination has now moved beyond angry speeches and disparaging soundbites. In the July 11 Letter, Committee Democrats have now wielded the investigative powers of Congress to harass Mr. Leo for exercising his First Amendment rights. That transforms what has to this point been a nuisance occasioned by intemperate rhetoric into a constitutional transgression.

“[T]he First Amendment prohibits government officials from subjecting an individual to retaliatory actions for engaging in protected speech.” *Nieves v. Bartlett*, 139 S. Ct. 1715, 1722 (2019) (quotation omitted). Thus, an official is prohibited from “tak[ing] adverse action against someone based on” that person’s expressive activity. *Id.* This bar against retaliatory action applies to Congress as much when it acts in its investigative capacity as when it legislates. *See Barenblatt v. United States*, 360 U.S. 109, 126 (1959) (“[T]he provisions of the First Amendment . . . of course reach and limit congressional investigations.”).

The Committee’s investigation into Mr. Leo’s relationship with Justice Alito quite clearly constitutes an adverse action for purposes of the First Amendment. The burden created by a congressional inquiry is significant. *See Watkins v. U.S.*, 354 U.S. 178, 197 (1957) (“The mere summoning of a witness and compelling him to testify, against his will, about his beliefs, expressions or associations is a measure of governmental interference.”). It can chill expressive

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activity and infringe on First Amendment rights. *See, e.g., Smith v. Plati*, 258 F.3d 1167, 1176 (10th Cir. 2001) (“Any form of official retaliation for exercising one’s freedom of speech, including prosecution, threatened prosecution, bad faith investigation, and legal harassment, constitutes an infringement of that freedom.”); *see also United States v. Hansen*, 143 S. Ct. 1932, 1963 (2023) (Jackson, J., dissenting) (noting that an investigative letter sent by members of Congress “can plainly chill speech, even though it is not a prosecution (and, for that matter, even if a formal investigation never materializes).”).

It seems clear that this targeted inquiry is motivated primarily, if not entirely, by a dislike for Mr. Leo’s expressive activities. Retaliatory motive can be shown in at least two ways: (1) where the “evidence of the motive and the [adverse action] [are] sufficient for a circumstantial demonstration that the one caused the other,” *Hartman v. Moore*, 547 U.S. 250, 260 (2006); or (2) where “otherwise similarly situated individuals not engaged in the same sort of protected speech” were not subjected to the same adverse action, *Nieves*, 139 S. Ct. at 1727. Both circumstances are present here.

As noted, Mr. Leo and the groups with which he is affiliated have been subjected to a barrage of disparaging remarks because of their views on judicial nominations and other judicial matters. Sen. Whitehouse has attacked “creepy right-wing billionaires who stay out of the limelight and let others, namely Leonard Leo and his crew, operate their” supposed “far-right scheme to capture and control our Supreme Court.” Senator Sheldon Whitehouse, Remarks on the Floor of the United State Senate (July 12, 2023). Senator Durbin has similarly decried “Leonard Leo and the Federalist Society” for their “joint effort [with] very conservative groups, special interest, dark money groups, and the Republican party” to shape “what will be the future of the court.” Senator Richard Durbin, Interview with the Washington Post (July 13, 2023). And perhaps most tellingly, the present investigation was announced with a statement titled “Whitehouse, Durbin Ask Leonard Leo and Right-Wing Billionaires for Full Accounting of Gifts to Supreme Court Justices.” Sens. Richard Durbin and Sheldon Whitehouse, Press Statement (July 12, 2023).

These explicitly political attacks, and others like them, made over the course of many years and reaching a crescendo in the days immediately following the transmission of the letter to Mr. Leo, provide an ample basis for concluding that the July 11 Letter is animated by animus toward “conservative” “Right-Wing” views and organizations, rather than a purely genuine concern about Supreme Court ethics. *See Lyberger v. Snider*, 42 F.4th 807, 813 (7th Cir. 2022) (explaining that statements from officials who took adverse action can demonstrate retaliatory motive). The circumstances of the Committee’s investigation show that “retaliatory animus actually caused” the adverse action taken against Mr. Leo. *Nieves*, 139 S. Ct. at 1723.

This conclusion is confirmed by the targeted and one-sided nature of the investigation. Despite professing interest in potential ethics violations and influence-peddling at the Supreme Court, the Committee has focused its inquiries on individuals who have relationships with Justices appointed by Republican Presidents. Reported instances of Democrat-appointed Justices

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accepting personal hospitality or other items of value from private individuals have been ignored. Here are some examples:

- In 2019, Justice Ruth Bader Ginsburg was given a \$1 million award by the Berggruen Institute, an organization founded by billionaire investor Nicolas Berggruen. See Andrew Kerr, *Ruth Bader Ginsburg's Mysterious \$1 Million Prize*, Washington Free Beacon (July 19, 2023). Justice Ginsburg used the money to make donations to various charitable causes of her choosing, most of which remain unknown. See *id.*
- Between 2004 and 2016, Justice Stephen Breyer took at least 225 trips that were paid for by private individuals, including a 2013 trip to a private compound in Nantucket with billionaire David Rubenstein, who has a history of donating to liberal causes. See Marty Schladen, *U.S. Supreme Court justices take lavish gifts — then raise the bar for bribery prosecutions*, Ohio Capital Journal (April 26, 2023).
- On September 30, 2022, the Library of Congress hosted an expensive investiture celebration for Justice Ketanji Brown Jackson that was funded by undisclosed donors. See Houston Keene, *Library of Congress explains why it hosted Jackson investiture but not for Gorsuch, Kavanaugh, Barrett*, Fox News (Sept. 30, 2022).
- On two occasions, Justice Sonia Sotomayor failed to recuse herself from cases involving her publisher, Penguin Random House, which had paid her \$3.6 million for the right to publish her books. See Victor Nava, *Justice Sonia Sotomayor didn't recuse herself from cases involving publisher that paid her \$3M: report*, N.Y. Post (May 4, 2023).
- Justice Sonia Sotomayor used taxpayer-funded Supreme Court personnel to promote sales of her books, from which she earned millions of dollars, including at least \$400,000 in royalties. See Brian Slodysko & Eric Tucker, *Supreme Court Justice Sotomayor's staff prodded colleges and libraries to buy her books*, Associated Press (July 11, 2023).
- Throughout her tenure on the Supreme Court, Justice Ruth Bader Ginsburg maintained a close relationship with the pro-abortion group National Organization for Women (“NOW”), which frequently had business before the Court. See Richard A. Serrano & David G. Savage, *Ginsburg Has Ties to Activist Group*, Los Angeles Times (Mar. 11, 2004). Among other things, Justice Ginsburg helped the organization fundraise by donating an autographed copy of one of her decisions, and contributed to its lecture series, even as she participated in cases in which NOW filed amicus briefs. See *id.*; Katelynn Richardson, *Here Are the Times Liberal Justices had Political Engagements that Were Largely Ignored by Democrats*, Daily Caller (May 5, 2023).

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None of these incidents has resulted in inquiries from the Committee. Yet, Committee Democrats have not meaningfully distinguished these examples from the supposed ethics lapses committed by Republican-appointed Justices that are the focus of the Committee's investigation. Moreover, for all of Committee Democrats' statements disparaging Mr. Leo for his First Amendment-protected advocacy pertaining to the law and the judiciary, they have evinced no interest in investigating the largest "dark money" network in American politics, that associated with the Democratic Party-aligned Arabella Advisors. See Emma Green, *Democrats Have Made Their Peace With Dark Money*, *The Atlantic* (Nov. 2021). Nor have they pursued the new Democratic Party-aligned coalition of "dark money" groups established specifically to "mold the [Supreme Court's] future." Adam Edelman, Dem-aligned groups launch campaign to keep Supreme Court front of mind in 2024, *NBC News* (June 12, 2023). To the contrary, Sen. Whitehouse—who has repeatedly attacked Mr. Leo for his advocacy—"praised the new campaign as a tool that could help combat" his policy opponents' advocacy. *Id.*

Where, as here, the scrutiny of an investigation is aimed at only one side of the political spectrum, it is a fair inference that politics is the motivating factor. See *O'Brien v. Welty*, 818 F.3d 920, 935 (9th Cir. 2016) (holding that university's decision to block a student with a "conservative point of view" "from posting about certain issues" on a school forum "while at the same time allowing posts expressing left-leaning viewpoints to remain" supported inference of First Amendment retaliation).

The Committee's failure to make any inquiries into similar incidents involving Democrat-appointed Justices is all the more troubling when juxtaposed against the focus of the Committee's questions to Mr. Leo. The July 11 Letter was apparently spurred by a report about a single fishing trip that Mr. Leo took with Justice Alito *over fifteen years ago*. Even assuming that trip is somehow relevant to present concerns about Supreme Court ethics, the connection is highly attenuated, focused on "an object remote" from purported "legitimate concerns" about ethics standards. *Church of the Lukumi Babalu Aye, Inc. v. City of Hialeah*, 508 U.S. 520, 535 (1993). The notion that a fishing trip a decade and a half ago is more pertinent to the Committee's current work than a \$1 million award given to a Justice less than four years ago is not plausible and bolsters the conclusion that the Committee's inquiries are motivated by its distaste for Mr. Leo's political views. Cf. *Brown v. Ent. Merchants Ass'n*, 564 U.S. 786, 802 (2011) ("Underinclusiveness raises serious doubts about whether the government is in fact pursuing the interest it invokes, rather than disfavoring a particular speaker or viewpoint.").

The Committee's Inquiry Violates Equal Protection

The Equal Protection component of the Due Process Clause of the Fifth Amendment prohibits government actions that are "based on 'an . . . arbitrary classification.'" *United States v. Armstrong*, 517 U.S. 456, 464 (1996) (quoting *Oyler v. Boles*, 368 U.S. 448, 456 (1962)). That protection extends to individuals who are not part of a protected class, see *Vill. of Willowbrook v. Olech*, 528 U.S. 562, 564 (2000), such as where unfavorable government action is taken because of "malicious or bad faith intent to injure" a particular person, *Cobb v. Pozzi*,

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363 F.3d 89, 110 (2d Cir. 2004); *see also Mimics, Inc. v. Vill. of Angel Fire*, 394 F.3d 836, 849 (10th Cir. 2005) (finding equal protection violation where differential treatment of “class of one” was undertaken “out of sheer malice”). And like the First Amendment, the protections of the Fifth Amendment fully apply in the context of a congressional investigation. *See Quinn v. United States*, 349 U.S. 155 (1955).

An unlawful, discriminatory exercise of government power occurs where a person is “intentionally treated differently from others similarly situated and . . . there is no rational basis for the difference in treatment.” *Olech*, 528 U.S. at 564. For reasons already given, those conditions are met here. Mr. Leo is clearly being treated differently from similarly-situated individuals who also have close personal relationships with Supreme Court Justices or who have travelled privately with a Justice. Whereas Mr. Leo is now the subject of a congressional inquiry, the many individuals and organizations who have facilitated travel for Democrat-appointed Justices, or exchanged gifts or personal hospitality with those Justices, are apparently immune from the Committee’s attention. These are clearly individuals and organizations “who engaged in similar conduct” to Mr. Leo. *United States v. Blackley*, 986 F. Supp. 616, 618 (D.D.C. 1997) (emphasis omitted). Yet their treatment by the Committee is vastly different from its treatment of Mr. Leo.

The Committee’s focus on Mr. Leo has sometimes been explained with reference to “dark money” and “phony front groups” that are supposedly out to “capture” the Supreme Court. Senator Sheldon Whitehouse, Remarks on the Floor of the United State Senate (Sept. 13, 2022). But no member of the Committee’s Majority has expressed similar concern about liberal organizations like Arabella Advisors that fully merit the “dark money” label, and that use their clout to advocate for judicial reforms favored by progressives. *See Emma Green, The Massive Progressive Dark-Money Group You’ve Never Heard Of*, *The Atlantic* (Nov. 2, 2021); Editorial Board, *The Stifle Speech Act of 2022*, *Wall Street Journal* (Sept. 22, 2022). Again, the politically based difference in treatment is unmistakable and telling.

Further, as we have already described at length, Committee Democrats have an extensive record of vilifying Mr. Leo for his lawful public advocacy, attacking him in the harshest possible partisan terms. It is hard to conclude that the disparate treatment to which Mr. Leo is being subjected is the result of anything other than “sheer vindictiveness” motivated by politics. *Esmail v. Macrane*, 53 F.3d 176, 178 (7th Cir. 1995). It therefore violates Equal Protection.

The Committee Lacks a Valid Legislative Purpose

Congress cannot conduct an investigation in connection with legislation that it cannot constitutionally enact. *See United States v. Rumely*, 345 U.S. 41, 45 (1953). Thus, a bill that, if enacted, would be unconstitutional cannot supply the Committee with a valid legislative purpose for its investigation. *See Quinn*, 349 U.S. 155, 161. That is true of the *Supreme Court Ethics, Recusal, and Transparency Act of 2023* (“Ethics Bill”), which the Committee, on purely partisan

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lines, ordered reported on July 20, 2023. The Committee’s inquiry is therefore impermissible for reasons independent of the infringement of Mr. Leo’s constitutional rights.

The Ethics Bill would, among other things, establish a process by which private individuals could file complaints against Supreme Court Justices, and would empower lower court judges to rule on those complaints. *See* S. 359, 118th Cong. (2023). That arrangement offends basic separation of powers principles in at least two ways. First, it would elevate lower court judges to the position of overseers of the Supreme Court, turning upside down the hierarchy of the judicial branch mandated by the Constitution. *See* U.S. Const. art. III, § 1. Second, the bill’s complaint process would work as an engine for generating continuous harassment of Supreme Court Justices, who could be deluged with frivolous ethics complaints that would distract them from their constitutional duties. *See Trump v. Mazars USA, LLP*, 140 S. Ct. 2019, 2034 (2020) (explaining that separation of powers principles are implicated where Congress harasses a coordinate branch in the performance of its duties).

More generally, any attempt by Congress to enact ethics standards for the Supreme Court would falter on constitutional objections. There is no enumerated power in Article I of the Constitution that authorizes Congress to regulate the inner workings of the Supreme Court. *See* U.S. Const. art. I. Ethics standards imposed by Congress on the Supreme Court would therefore necessarily be unconstitutional. *See New York v. United States*, 505 U.S. 144, 177 (1992) (holding congressional action unlawful where it “[i]nfringe[s] outside Congress’ enumerated powers”). Likewise, regardless of their particulars, any ethics standards Congress may enact would raise separation of powers concerns of sufficient magnitude to render them invalid. *See Humphrey’s Ex’r v. United States*, 295 U.S. 602, 629 (1935) (holding that each branch of government must be “entirely free from the control or coercive influence, direct or indirect” of the other branches). The fact that Congress has already enacted laws that purport to impose ethics standards on the Justices does not change this conclusion. The legality of those laws has never been tested in court. And as Chief Justice Roberts has made clear, the Supreme Court has never acquiesced to Congress’s assertion of authority over the Court’s ethics standards, and Congress of course cannot expand its own power under the Constitution by passing an unconstitutional statute.

* * *

The Senate’s investigative authority should, as a matter of both law and prudence, be exercised consistent with the freedoms guaranteed to every American by the Bill of Rights. Turning the Senate into a “platform of irresponsible sensationalism” where an individual’s “right to hold unpopular beliefs” and “right of independent thought” are disregarded is a course that we know from past experience can serve no good end. Senator Margaret Chase Smith, Declaration of Conscience (June 1, 1950). We will not be part of that journey.

July 25, 2023

Page 8

Sincerely,



David B. Rivkin, Jr.

Partner

Exhibit 2

No. 22-7695 Kelly v PA ODC Motion to correct the record and to preserve 1st Amendment waiver to petition

From: Meg Kelly (meghankellyesq@yahoo.com)

To: rmeek@supremecourt.gov; harriet.brumberg@pacourts.us; anthony.sodroski@pacourts.us

Cc: meghankellyesq@yahoo.com; zi-xiang.shen@delaware.gov; supremectbriefs@usdoj.gov

Date: Wednesday, September 6, 2023 at 10:14 AM EDT

Good morning,

Attached please find a motion to correct the record, wherein I request the Court also refrain from answering Senator Whitehouse's September 4th petition

- 2. Exhibit A Press releases from the Federal Reserve showing the reserve requirement was reduced from 10 Percent to zero creating conditions that will make banks fail should people request their deposits
- 3. Exhibit B Excerpts from the World Economic Forum Founder's Klaus Schwabb and Thierry Mallerett's Book The Great Narrative regarding elimination of the dollar and the Central bank's judicial power unrestrained by the courts and limited by their "own imagination"
- 4. Exhibit C Whitehouse's complaint against Justice Alito.

Robert Meek, I do not have money or stamps to respond to amicus briefs. I had to ask the courts to consider saving itself and the rule of law to save me and the world herein instead of potentially fighting congress in my other two cases by amicus briefs.

I am acting hastily and even imperfectly to assert my rights in order not to waive them. I would rather do something in the face of grave threats not only to myself but to the entire world than do nothing. I am sorry if I let this Court down since I am such a poor typist and write in haste.

On an aside my mom and dad contracted covid over the Labor Day weekend. They live in Florida. I live in Delaware, but my mom was intending to visit on the 20th. I am a bit scared I may get sick should she still visit me Robert Meek. I will keep you and all opposing counsels informed should there be a risk.

I am also concerned they may die since they are very old. My dad has a surgical procedure scheduled September 15th. They behave like they are superman because they took the vaccine. They misbehave and are not super beings immune from sickness and death. I am quite sad they do not feel well because I love them.

On an aside, I am not sick, but I am dangerously dehydrated due to the surgery I had as a youth and assert my religious exercise to live and not die for the vanity of people in all courts. Every month I lose five pounds of water weight and I collapse if I am not afforded time to drink gallons not cups of water. It is a matter of life and death for me for more than 20 years. I believe people sin by referring people to doctors, or blindly telling people to pay or professional or pay for a product. I have religious objections to healthcare and science when they are made demi-gods.

I believe people sin leading to hell when they tell others to blindly trust the experts, professionals, products or man's creation technology, science should they not repent. See Romans 1:25. I believe it is idolatry making man and man's creation God in place of God. It serves what I believe is the mark of the beast business greed, sacrificing people or free will for the forced will at what is profitable at the cost of human life, liberty or health under the lie of saving it by making people and their products above court correction when they kill, steal or destroy for the bottom line. It is basically barbaric human sacrifice for material gain, same as throwing people in a volcanoes under the belief in a lie it will help crops.

I prefer the people think things out, not blindly trust professionals dumbed down b standardization or training who do not care to think outside the standards when they may harm human life, liberty or health. It is blindness Jesus speaks of blinded for money for a paycheck to provide for their own or convenience. This dumbing down by standards prevents people from seeing clearly based on truth not a barter or exchange by exchanging every

freedom for material gain by standardization.

Thank you for understanding I keep myself separate by not doing what others do when I believe it is sin.

Thank you.

With sadness and yet hope,
Meg
Meghan Kelly
34012 Shawnee Dr
Dagsboro, DE 19939
(302) 493-6693
meghankellyesq@yahoo.com



Motion to correct the Writ.docx
22.9kB



Motion correct an error and to preserve 1st Amendment rt to petition without elimination by Whithouses
Complaint.pdf
22.4MB



Certificate of service September 6 2023.pdf
657.3kB



Postal tracking Sept 6 Motion to correct and please do not ans Senator.pdf
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Exhibit 3



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Total			\$0.15
USPS Grnd Advtg	1		\$10.65
Washington, DC 20543			
Weight: 4 lb 0.20 oz			
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Fri 09/08/2023			
Tracking #:			
9534 6149 9861 3249 2201 17			
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Up to \$100.00 included			
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Total			\$0.75
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UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

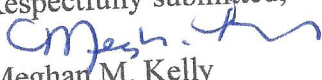
Meghan Kelly)	Civil Action No.: 1:21-1490
)	(CFC)
Plaintiff,)	
v.)	
Disciplinary Counsel Patricia B.)	
Swartz, et.al)	
Defendants.)	

CERTIFICATE OF SERVICE OF PLAINTIFF MEGHAN KELLY'S 77th AFFIDAVIT UPDATE

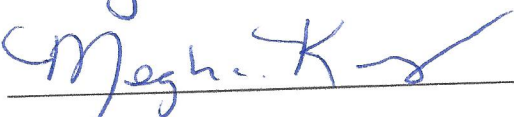
I, Meghan M. Kelly, Esquire, hereby certify on 9/6/2023, I had a true and correct copy of the above referenced document, served to Defendants, through their counsel through email electronically:

Zi-Xiang Shen
Delaware Department of Justice
820 North French Street
6th Floor
Wilmington, DE 19801

Dated 9/6/2023

Respectfully submitted,

Meghan M. Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com

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

Dated: 9/6/2023
Meghan Kelly (printed)
 (signed)

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF MEGHAN KELLY’S 93rd AFFIDAVIT

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

1. I am still drafting a complaint against Biden per the attached, and intend to file something to make the government fund all branches not merely two. This issue is capable of repetition and yet evading review. I think the Court should rule it unconstitutional under the Equal protection’s component of 5th Amendment and the 13th Amendment right against involuntary servitude without bartered for pay to fully fund the members of the executive branch and Congressional branch while failing to pay members of the judiciary branch for work done.

2. I apprised this court debt is against my religious belief. Money is currently coined to enslave people and the government to debt.

3. The US Supreme Court held the greenbacks President Lincoln coined which were made by Congressional authority were lawful and Constitutional in Knox v Lee, 79 U.S. 457 (1871).

4. Thus the Congressional authority granted to Janet Yellen to coin money without debt and interest to fully fund the courts should be held Constitutional.

5. What is not Constitutional is the violation of the equal protection clause by paying two branches and leaving the courts unpaid to work by compelled involuntary servitude without pay under the risk of losing a position they may not be paid for.

6. I am really freaked out. I have to include more facts than I realized and supply more papers in this appeal to defend my life and liberty against potentially even the US Supreme Court should they seek to sue me to by finding my religious beliefs repugnant.

7. I have to do what is right, not for what is convenient to others which I believe damns people to hell.

Thank you for your time and consideration.

Dated 9/30//23

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

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

Dated: 9/30/23

Meghan Kelly (printed)

 (signed)

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

Meghan Kelly)	Civil Action No.:
Plaintiff,)	
v.)	
JOSEPH BIDEN,)	
President of the United States,)	
in his official capacity,)	
and,)	
JANET YELLEN, Secretary of Treasury,)	
in her official capacity)	
Defendants.)	

Plaintiff’s Complaint to enjoin Defendants from failing to pay federal government and from suspending the operations of the federal government on the ground Congress has not passed a budget by or before September 30, 2023, and for a writ of mandamus to require Biden and Yellen to coin money under 31 U.S.C. § 5112 (k) without debt or interest and without regard to the private entity the Federal Reserve

1. Plaintiff Meghan Kelly, Esq., pro se pursuant to FRCP 65 and Act and 28 U.S.C. § 1651(a), asks this court to enjoin the President Joseph Biden, in his official capacity as the President of the United States, and Janet Yellen, in her official capacity as Secretary of Treasury, (collectively “Defendants”), from not paying federal workers and from suspending the operations of the federal government on the ground Congress has not passed a budget by or before September 30, 2023 on 1st, 5th, 13th and 14th Amendment grounds and further requests this Court sign a writ of mandamus to require Defendants to coin money without interest or debt under 31 U.S.C. § 5112 (k) to pay off the national debt in full or in the alternative to pay for federal employees and the operations of the federal government for all sums exceeding the budget shortfall and states as follows:

Parties

2. Meghan Kelly is an attorney in the state of Delaware whose license is placed on inactive/disabled but for her exercise of her private 1st Amendment right to petition to sue former

President Donald J. Trump in the Delaware Chancery Court to alleviate a substantial burden upon her religious exercise under the RFRA and to dissolve the establishment of government religion. I am currently seeking to appeal judgments, and a dismissal of a civil rights case. I must safeguard my only hope of a savior to preserve my Constitutional freedoms, the courts.

3. Defendant Joseph Biden is the President of the United States (“Biden”). He is a resident of the state of Delaware and may be sued in his official capacity through the local US Attorney General David Weiss, Esq. located at Hercules Building, U.S. Attorney's Office, 1313 N Market Street, PO Box 2046, Wilmington, DE 19801.

4. Defendant Janet Yellen is the Secretary of Treasury (Yellen). Defendant Janet Yellen is the Secretary of the Treasury of the United States and, in that position, is responsible for financing the federal government's operations. She may be served through the US Attorney General David Weiss located at Hercules Building, U.S. Attorney's Office, 1313 N Market Street, PO Box 2046, Wilmington, DE 19801.

Venue

5. Venue is appropriate since Plaintiff Kelly is a resident of Delaware under 28 U.S.C § 1391 (e) (c).

Jurisdiction

6. This Court has jurisdiction pursuant to 28 U.S.C. § 1331.

Background

7. In 2016 I discovered non-attorney out of state title companies were practicing real estate law without a license messing up the chain of title at the Recorder of Deeds, taking

advantage of attorneys like my esteemed deceased colleague Richard Goll, Esq, and losing income tax for the state of Delaware for business performed out of state, despite my religious objections to taxes.

8. I learned attorney disciplinary rules do not restrain non-attorneys and non-judges such as out of state title companies from practicing law without a license.

9. So, I ran for office in 2018 in hopes to prevent non-attorneys from practicing law without a license to prevent harm to the public.

10. I lost the election, but I learned there is a real agenda to eliminate people judges and people lawyers required to uphold the individual exercise of private Constitutional rights from being eliminated or sacrificed by the marketed or bought, but not actual majority's represented choice, through the vote. See the Exhibits attached hereto and incorporated herein.

11. There is evidence of an agenda to eliminate judges' authority to uphold justice in the courts to be supplanted by injustice through a global agenda to implement a carbon credit debt system through the central banks and other entities who create or control money or debt through digital currency, blockchain or other means to enslave a no longer free people to bend their will to the control of those who control the resources unrestrained by the just rule of law.

12. There is evidence of a schemed slow overthrow of these United States by private and foreign government backed partners taking over the government's authority, to recoup or control resources owed to it by the government through treaties, executive orders, grants or contracts or other exercise of government authority, in order to control the government by controlling the resources to eliminate the government's power to restrain businesses, charities,

banks, not for profits, churches or other entities from enslaving, oppressing, killing, stealing or destroying human life, liberty or health by the just rule of law.

13. There is evidence of a non-violent intentionally schemed rebellion to overthrow the government by eliminating the rule of law and the authority by the judiciary by those the government owes the private and foreign partners, including but not limited to the Federal Reserve, World Bank, IMF in my attempt to require congress coin money without debt and interest to eliminate slavery to safeguard Constitutional freedoms to buy and sell by free not government backed private or foreign choice through currency controlled by those who gain more the worse off we are in.

14. I also seek to dissolve any and all executive orders with the WHO, UN, and any other global entity or agreement this court may deem a threat to national security due to elimination of independence by compromised corrupt collusion with foreign or private entities which eliminate Constitutional liberties by compelled, conditional, compliance. Executive orders creating relationships with global entities eliminate the United States independence that is required to make us free not compromised, corrupt and enslaved to global wicked interests of those who control the resources to rule over people, not adhere to laws protecting their liberty.

15. To maintain our independence that make us free this Court must dissolve the executive orders granting relationships with the UN, WHO and maybe more organizations.

16. To maintain our independence that make us a free people protected by the Constitutional rule of law this court must also dissolve government private relationships and partnerships. No grants or contracts should be given to any private or foreign entity as this creates a forced and unfair market that makes private and foreign partners above the law and the

people for sale slaves in a fixed subpar economy where standards harm and exploit people to serve profit, positions and power under ordered control.

17. Under the lie of welfare, security and safety compelled conditional compliance to nongovernment entities within and outside of the US as opposed to the Constitutional provisions of safeguarding people's lives and liberty, the executive orders and private partnerships create the threats and harm to sustain their positions, power and streams of profit. The relationships eliminate freedom by ordered control.

18. Impartiality by the President is required under the 5th Amendment Equal Protections component. When the President corrupts the government by compromising the independence of this country to the collective, conditional, collaborative aims of organizations whose focus is eliminating freedom by economically, or physically compelled conformity ordered control elimination of freedom is the aim.

19. The Fourteenth Amendment section 4 provides in part, "But neither the United States nor any State shall assume or pay any debt or obligation incurred in aid of insurrection or rebellion against the United States, or any claim for the loss or emancipation of any slave; but all such debts, obligations and claims shall be held illegal and void."

20. All of the money owed by the Federal government to private and foreign partners including but not limited to the Federal Reserve, and global banks, including the BIS, IMF, World Bank are debt and obligations incurred in aid of a non-violent insurrection to overthrow the government by indebting to enslave to control a no longer independent government and its people, and may arguably be deemed illegal or void.

21. Yet, the schemed overthrow of the government may be prevented should the government coin without debt and interest to eliminate and discharge by payment debts owed.

22. The Federal Reserve's creation of debt and interest on debt through interest rates for every dollar the Treasury prints out of slavery debt is illegal as in violation of the 13th Amendment by involuntary compelled servitude and my First Amendment right to religious belief and exercise of religious beliefs.

23. The Federal Reserve is a private corporation, containing banks as shareholders. In their private capacity as banks, the worse off the people are, the more money they create out of debt they may sell people and the government to gain not only profit in terms of the debt created owed for lending out what they did not physically have, but profit on interest.¹ There is

¹ *Hubbard v. Fed. Rsrv. Bank of Atlanta*, No. CIV.A. 96-2354, 1996 WL 551496, at *1 (E.D. La. Sept. 26, 1996) (“Federal Reserve Banks are independent corporations owned by commercial banks in their geographic regions”); *Id.* (“While the Federal Reserve Board regulates the Reserve Banks, direct supervision and control of each Bank is exercised by its board of directors. 12 U.S.C. § 301. Each Reserve Bank is statutorily empowered to conduct its activities **without day-to-day direction from the federal government.**”); *Lewis v. United States*, 680 F.2d 1239 (9th Cir. 1982) (“Federal reserve banks are **not federal instrumentalities** for purposes of a Federal Tort Claims Act, but are **independent, privately owned and locally controlled corporations** in light of fact that direct supervision and control of each bank is exercised by board of directors, federal reserve banks, though heavily regulated, are **locally controlled by their member banks, banks are listed neither as “wholly owned” government corporations nor as “mixed ownership” corporations**; federal reserve banks receive no appropriated funds from Congress and the banks are empowered to sue and be sued in their own names.” 28 U.S.C.A. §§ 1346(b), 2671 et seq.; *Federal Reserve Act*, §§ 4, 10(a, b), 13, 13a, 13b, 14, 14(a–g), 16, 12 U.S.C.A. §§ 301, 341–360; 12 U.S.C.A. § 361; Government Corporation Control Act, §§ 101, 201, 31 U.S.C.A. §§ 846, 856.)); *Schaffer v. Pub. Emps. Ret. Sys.*, 21 Ohio St. 3d 86, 91, 488 N.E.2d 162, 165 (1986) (“Dissent, In *Lewis v. United States* (C.A. 9, 1982), 680 F.2d 1239, and *Arney v. United States* (Dec. 4, 1979), D.Tenn.No. 77–3503–NA–CV, unreported, the courts held that federal reserve banks were **not federal agents** for purposes of the Federal Tort Claims Act, Section 1346(b), Title 28, U.S. Code. Both courts noted that Congress structured the reserve banks as **corporate entities owned by commercial banks** ‘under the supervision and control’ of their own boards of directors and subject only to general supervision by the Board of Governors of the Federal Reserve System. See Sections 301 and 248(j), Title 12, U.S. Code. Both the *Lewis* and *Arney* courts thoroughly analyzed the operation and the legislative history of the Federal Reserve Act and found, among other things, that the federal government had no financial involvement in the banks, the banks were **independent corporations**, the banks primarily serviced **private business** and financial entities, and the federal government did not control the daily operation of the banks. These courts also found that **federal reserve bank employees were not subject to federal governmental control**. The bank had the right to hire and fire its employees. The employees did not participate in the civil service retirement system or the federal workers' compensation programs, they were not subject to federal travel regulations, and they did not receive governmental employees' discounts. The Federal Reserve Act reflects the Congressional intent that federal reserve banks remain non-governmental entities. Although federal reserve bank policy with respect to interest rates and the like remains under the general supervision of the federal reserve board, the banks are private entities separate and distinct from the government. The drafters of the Federal Reserve Act made clear the private function of federal reserve banks: ‘The Federal reserve banks * * * would be in effect cooperative institutions, carried on **for the benefit of the community and of the banks themselves by the banks acting as stockholders therein.** * * * The committee, however, recommends that they shall be individually organized and individually controlled, each holding the fluid

aa conflict of interest since central banks like the private federal reserve gain more power, importance in position, and private profit the worse off the Country and the American people are. The shareholding banks of the federal reserve have incentive to make America and the people worse off. Banks gain more profit on debt interest, the worse off, and the more debt America and Americans are in. The wars we wage, are never for freedom, but enslave the people to pay back the debt and debt on interest to the banks, the Federal Reserve gains through military spending, while enriching businesses who make money off of the artificially created need to serve greed under the guise of liberty. There are global plans alluded to by the World Economic Forum members (“WEF”) and participants of the World Government Summit (“WGS”) to create more waste, to create more debt, to gain more profit on debt for banks, and artificial need to serve business greed to private and foreign partners to fund research, contracts, grants, and carbon credits or debts, under the pretty name of science, to maintain debt control over the world.

funds of the region in which it is organized and each ordinarily dependent upon no other part of the country for assistance. The only factor of centralization which has been provided in the committee's plan is found in the Federal reserve board, which is to be a strictly Government organization created for the purpose of inspecting existing banking institutions and of regulating relationships between Federal reserve banks and between them and the government itself.' H.R.Rep. No. 69, 63rd Cong., 1st Sess. (1913), 17–18.”)

¹ *Lewis v. United States*, 680 F.2d 1239 (9th Cir. 1982), (“The Reserve Banks are deemed to be federal instrumentalities for purposes of immunity from state taxation.”)
Schaffer v. Pub. Emps. Ret. Sys., 21 Ohio St. 3d 86, 488 N.E.2d 162 (1986) (“The Supreme Court held that federal reserve bank is “governmental entity ‘operated by’” United States Government so as to **qualify for credit within Public Employees Retirement System**”); [This does not seem fair that they get federal retirement benefits without oversight or Constitutional limits as a nonfederal instrumentality.] *See also, Farm Credit of Nw. Fla., ACA v. Easom Peanut Co.*, 312 Ga. App. 374, 384–85, 718 S.E.2d 590, 602 (2011) (Holding this bank entity was immune from suit as a government instrumentality, which makes banks above the law); *But See, McGee v. Tucoemas Fed. Credit Union*, 153 Cal. App. 4th 1351, 63 Cal. Rptr. 3d 808 (2007) (This Court holds the banks waive immunity); *Rheams v. Bankston, Wright & Greenhill*, 756 F. Supp. 1004 (W.D. Tex. 1991) (“Federal Home Loan Bank of Dallas was not a “federal agency” within meaning of Federal Tort Claims Act and its employees were not employees of government for purposes of removing case to federal court. 28 U.S.C.A. §§ 1346(b), 2671.”).

24. While the shareholders or members of the Federal Reserve are private persons, they appear to gain the benefits of federal employees, such as retirement, while not being subjected to the liability in the form of federal limits. The Federal Reserve is not the Federal government, though I should like the Courts to find every entity the government delegates grants, contracts or authority to as government agents not protected by the Constitutional limits including the contract's clause, and US Amend XIII, instead limited by them, having reduced freedoms to safeguard the public under the supreme law of the land the Constitution.

25. The Federal Reserve is a private corporation ruling as opposed to governing and guiding due to Congress's delegation of its authority to control currency as a product to maintain its power, position and profit by barter or exchange. This entity exploits the people and the government to control and enslave the people by controlling the value of money under the deception of caring for the people.

26. The Federal government issues paper currency, officially called Federal Reserve notes and commonly called cash. A Federal Reserve note is an IOU from the Fed to the Federal Reserve. As such, it is a liability on the Fed's balance sheet.

27. The government through the treasury issues money, called federal reserve notes in the physical form of dollars or coins and gives them to the Federal Reserve for use by its bank members upon the Fed's request, while increasing debts of the government to enslave a no longer free people to pay back the free lunch for the banks' members' gain.

28. The notes are backed by financial assets that the Federal Reserve Banks pledge as collateral, which are not actually owned by the banks under fractional reserves. The notes are backed by other people's assets, which I believe is the definition of a Ponzi scheme. The notes

are mainly backed by Treasury securities and mortgage agency securities that the banks purchase on the open market by fiat payment using other people's money as their own through fractional reserve banking theories.

29. This jeopardize people's land and homes, should an economic crash occur, to serve the greed of banks and profiteering private and foreign entities, not the welfare of the people or this nation. Securitized property is schemed to be recouped by the banks when increases in taxes make it unaffordable to pay off tax liens. The Banks then recoup resources and property to give it those the banks, including the Federal Reserve owes. The members of the federal reserve do not lose their own personal assets, it is the people's securitized assets and the deposits in the banks that may be lost, despite the limited protection FDIC purports to give.

30. I am concerned this may cause a foreclosure crisis, leaving many homeless, if the court does not consider the welfare of the people more important than debt control, and power money grants to those who have it by unjust gains to buy influence.

31. The Federal reserve should not be charged with controlling the currency. The government must take back its coining power to care for the people while protecting individual liberty, not controlling the people, through money by indebtedness and grants to entities as opposed to individuals in need.

32. The way money is coined is the problem. The new digital currency is a worse problem that exacerbates and substantially burdens Constitutional freedom by slavery debt to the government backed private partners. I should like this Court to require Defendants to coin lawfully at all times, but during this emergency Complaint I humbly request this Court compel Defendants to coin money without debt and interest under 31 U.S.C. § 5112 (k) to pay off the

national debt in full or in the alternative to pay for federal employees and the operations of the federal government for all sums exceeding the budget given the exigent circumstances.

33. The Federal reserve members and the banks eliminate freedom by substantially burdening the will of the people by creating money out of debt slavery and controlling interest rates. I am a Christian. I believe people Janet Yellen and President Biden not only violate the US Amend XIII by enslaving the government and its people to Central banks and banks through fractional reserve, I also believe they violate God's laws as a Christian.

34. Debt slavery is against my religious belief. I believe Jesus when he teaches "you cannot serve God and money." Matthew 6:24. Those who make money their master and savior in place of God are evil to be damned to hell, because their love for money even through fundraising and charity drives out their love for one another replaced with the mark of the beast that this Court may erase should it require the government to coin lawfully. My God teaches people go to hell for charging debt in interest. Making money out of nothing with no value other than slavery debt plus interest is a far greater sin which the Federal Reserve commits. See, Ezekiel 18: (" He lends at interest and takes a profit. Will such a man live? He will not! Because he has done all these detestable things, he is to be put to death [in hell, the Second death]; his blood will be on his own head.")

35. I do not want people to go to hell. I believe the courts have the power to not only save lives but eternal lives too. I believe that the founders were imperfect fallible and even scheming men. I believe judges reflect the image of God when they care to think things out in order to do what is right by guiding misguiding people and protecting even those they are correcting.

36. Jesus teaches most people will go to hell on judgment day. Matthew 7:13-15. Jesus teaches many people think they follow him, but they are misled which is sad. See Luke 13:23-28. I believe judges in courts can help the blind see, and prevent them from going to hell. Ignorance is not innocence and people go to hell for not caring to know in order to love. I believe people judges can help them know to allow them more opportunity to turn away from living based on desires, sins, to lay down their desires to think things out to do what is right.

37. Presidents Lincoln, Jackson and Kennedy all proposed coining money without slavery debt to uphold the freedoms of the people. President Jackson misbehaved on how treated Indians, but he was correct about the banks.

38. President Lincoln created debt free, interest free money by signing the Act of Feb. 25, 1862, ch. 33 § 1, 12 stat. 345.28. President Kennedy signed FR 5605, Exec. Order No. 11110, which also created money without debt or interest, albeit after he was murdered it was withdrawn.

39. The United States Supreme Court indicated President Lincoln's paper money was constitutional, overturning a prior case. In *Knox v Lee*, 79 U.S. 457 (1871), the U.S. Supreme Court held that the Legal Tender Act, which authorized the printing of paper money, President Lincoln's Greenbacks, not redeemable in gold or silver, nor creating debt or incurring interest, did not violate the U.S. Constitution. In so ruling, the Court reversed its earlier decision in *Hepburn v. Griswold*, 8 Wall. 603, 623, 19 L.Ed. 513. There is a way out to reverse or prevent a planned economic crash.

40. President Kennedy's Order creating money without enslaving people to pay it back like Lincoln.

41. The law authorizing the Treasurer to coin the trillion dollar platinum coin looks similar to the mere executive order President Kennedy signed which he was apparently killed for. Kennedy's Executive Order was withdrawn after his death. Executive Order 11110 was issued by U.S. President John F. Kennedy on June 4, 1963. This executive order amended Executive Order 10289 (dated September 17, 1951) by delegating to the Secretary of the Treasury the president's authority to issue silver certificates under the Thomas Amendment of the Agricultural Adjustment Act, as amended by the Gold Reserve Act. Kennedy allowed money to be coined without debt or interest.

42. Congress passed a law that allows the Secretary of the Treasury to coin money through the platinum bullion without debt and interest by her discretion, not the Federal Reserve. 31 U.S.C. § 5112 (k) provides: “(k) The Secretary may mint and issue platinum bullion coins and proof platinum coins in accordance with such specifications , designs , varieties , quantities , denominations , and inscriptions as the Secretary, in the Secretary's discretion , may prescribe from time to time”

43. Janet Yellen the Treasurer also indicates she would refuse to coin the platinum coin per the attached articles admissible under the periodical exception and admissions by a party opponent. It is true every note of money we have is an I owe you to slavery debt plus interest to those who lend out what they do not have placing our national security at risk to those who have more power or profit the worse off we are the Federal Banks and the banks. Yet, this Court must direct her coin this without debt or interest owed to the Federal Reserve to preserve these United States by fully funding the federal employees who make up the federal government and the one potentially weakened unfunded branch the Courts. This Court must direct Defendants to coin money without regard to the fact every dollar says Federal Reserve Note, and without regard to

the fact the Federal Reserve private bank may not accept it. This Court must direct Biden and Yellen to coin money without regard to the Federal Reserve's desire for slavery debt control and profit. I care about sustaining these United States from a schemed agenda to overthrow it by allowing the private partners to assume Corporate governance and desired hyperinflation to allow private entities the Federal government is wrongly enslaved to owe recoups to control resources to control the government to eliminate the government after 2050.

44. This Court must require Defendants to issue Federal Reserve notes to pay off debt and federal workers salaries owed using the trillion dollar coin must without liability for the printed money so coined to the master private Federal Reserve Bank who coins to enslave and control not to safeguard freedom. The government should not owe the Federal Reserve who gives it what it does not have while enslaving the people to pay it back. The 16th Amendment was enacted to tax the people to pay the interest on the debt the Federal Reserve enslaves the government and the people to.

45. This court must require Biden and Yellen to coin the money without acceptance by the Federal Reserve, which creates slavery debt and without enslaving the people to interest and debt.

46. Slavery is against my 1st Amendment protected religious beliefs and violates the 13th Amendment.

47. The failure to pay federal workers, including but not limited to federal judges, judicial staff, US Attorney Generals, FBI, CDC and other federal agencies in a government shut down by compelled force where there is no meeting of the minds is involuntary servitude and compelled slavery.

48. According to the BBC news released 9/26/23,

“The president of the United States has a guaranteed income. Congress is also not affected - its members are exempt and, in any case, its funding bill has already been approved. The US Department of Justice is among those affected - with many lawyers and judges not working during a shutdown. Others are working without pay.” Citing, <https://www.bbc.com/news/world-us-canada-46927916>, BBC News, *What is the likelihood of a US government shutdown?*, By Tom Geoghegan, 9/26/23 (Under periodical exception).

49. The shut down threatens to weaken only one of the three branches of government whereas the President and Congress are fully paid in violation of the 5th Amendment’s Equal Protections component by disparate treatment as to which representatives in the federal government may be paid, which endangers me in particular as a party one. My religious belief requires I uphold the impartial implementation of justice in the courts, which includes safeguarding the judiciary from being weakened and in want of pay for labor performed.² See *Romans 4:4*.

² I am a Christian. I place my faith in God the father, the son Jesus, and the Holy spirit revealed to me, born again people, including people in the Bible. “Justice in the courts” is a command” Citing, the Bible, Amos 5:15 Jesus teaches justice and mercy are greater commands than monetary and material laws . Matthew 23:23; see also, John 7:24 (Jesus commands “Do not judge based on appearance, judge correctly.”) (See the following Bible passages against partiality in the courts, 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"); (Exodus 23:6, "You shall not deny justice to the poor in their lawsuits."); (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."); (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."); (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."); (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.").

50. I am also in particular danger of justice should the courts not hear my cases to overturn disciplinary determination on my licenses to practice law and vitiations of my fundamental rights due to fewer people reviewing US Supreme Court briefs.

51. In addition, due to my inability to work as an attorney based on a judicial determination of disability, I cannot work at my former law firm. So, I applied for food stamps. I will not receive food benefits should a shut down persists and face particularized danger. I risk losing a property interested protected under the 5th Amendment should a default arise lasting more than a month, but I care more about my liberty interests more. The shut down decreases the odds the US Supreme Court will grant petitions for writ of certiorari to safeguard my First Amendment rights to petition, religious belief, exercise of religious belief, speech and association without government incited persecution but for finding my religious beliefs repugnant.

52. This issue is capable of repetition yet evading review. Exceptional circumstances of peculiar emergency or public importance require all three federal branches be fully funded.

53. The usurpation of judicial power and a clear abuse of discretion exists by Defendants failure to exercise her discretion to coin money without debt and credit to fully fund one branch of government to preserve these United States from schemed overthrow.

54. The nation is in peril when the federal employees charged with upholding justice in the courts to safeguard individual liberties from being eliminated by majority rule through the vote. The judicial branch is at the mercy of the other two branches without the power to place a check on the other two branches.

55. Defendants thoughtfully, willfully abuse their discretion by not supporting the judicial branch while fully funding the members of the two other branches creating a clear and present danger by not upholding the three branches that make up the government.

56. Federal employees are compelled to work without pay due to two branches childish, dumb, conniving, self-serving antics to follow their lawless lusts untamed by the just rule of law. which may tempt the federal servants to be enslaved to the banks by taking out credit card debt or high interest loans which ultimately profit the members of the federal reserve in their private capacity as commercial bankers, but it endangers the entire nation by weakening once branch.

57. Upholding impartial injustice in the courts is a religious exercise of my belief. I am a Christian. Justice in the Courts is a command by God, a preempting command per Jesus.

56. I believe there will be a slow overthrow of the nation by the unlawful way money is currently coined by slavery debt plus interest and the worse way it is schemed.

57. Defendants unreasonably place national security at risk when the Courts, the Attorney Generals, the FBI, the CDC are left to work with out pay or without a full staff given there is a global war, China's surveillance base is spying on us from Cuba since 2019, there's a global pandemic, there is a global economic crisis, 80 trillion dollars of government pensions and other debt were written off by debt swaps per the BIS in 2022, and we face abnormal incessant contrived crisis. I desire the courts fully fund federal pensions, pay and social security under 31 U.S.C. § 5112 (k) too to preserve our national security by preserving the people who make up our government.

58. Exceptional circumstances of peculiar emergency or public importance requiring the courts act.

59. Slavery debt must be prevented to preserve the independence of the only impartial branch of the government, that prevents the other two branches from enslaving the country and the people to serve the partial desires of the government backed private and foreign partners under the deception of waiver of Constitutional liberties through the vote.

60. The Courts are the only branch that protects Constitutional liberties from being eliminated and sacrificed by the other two branches under the guise of representative authority in our Democratic Republic.

61. My religious objections to debt are genuine. I am a Christian.

62. Slavery by debt is against my religious beliefs. Federal workers will be required to work without pay, without a meeting of the minds or a choice. It is my religious exercise to seek justice in the courts to uphold the freedoms of government workers who are not below the law's protections, albeit they have more limited freedoms in order not to chill the rights of those they are paid to serve.

63. The following provision under U.S. Const. art. I, § 8 authorizes Congress to create money, arguably without debt or interest as the US Supreme Court previously upheld in *Knox v Lee*, 79 U.S. 457 (1871).

64. While the Constitution also unlawfully empowers Congress to enslave itself and its people making them less free and for sale slaves to private and foreign partners under a separate provision of U.S. Const. art. I, § 8 authorizing it with the power "to borrow money" to enslave the people to pay back their master creditor as ruler by taxes, which I argue violates the

13th Amendment and the premise of the Constitution to safeguard freedom and life as unconstitutional, this court merely must discern whether the delegated provision authorizing Yellen to coin at her discretion, not the discretion or request of the Federal reserve, without debt and interest is an abuse of discretion that jeopardizes the Courts and the federal government from dissolution and schemed overthrow or threat of security and the rule of law.

65. I have sincere religious objections to debt, especially debt created out of slavery by force, not a free meeting of minds under government compelled economic, physical or social government backed private and government backed foreign threats under the 2030 and 2050 plans under the far more heinous private plans to coin.

66. The government must do its own job and not delegate its authority or responsibilities to others. The government must coin to care for the people, not control and enslave the people to private and foreign powers or partners.

67. Elected officials are not above the law. When elected officials in the other two branches violate duties to uphold the life and liberty of those the Constitution requires they serve to instead oppress, and control by subjugated social, economic or physical force, we need the courts to find their conduct in violation of the Constitutional limits to make our people free with the limit the people may not enslave, harm or kill others. We must protect all people's individual freedoms from elimination under the collaborative, conditional, collective control of private and foreign partners and threats.

Wherefore I ask this case to enjoin Defendants from

68. Enjoin Defendants from not paying federal workers and from suspending the operations of the federal government on the ground Congress has not passed a budget by or

before September 30, 2023 on 1st, 5th, 13th and 14th Amendment grounds and further requests this Court sign a writ of mandamus to require Defendants to coin money without interest or debt under 31 U.S.C. § 5112 (k) to pay off the national debt in full or in the alternative to pay for federal employees and the operations of the federal government for all sums exceeding the budget shortfall and states as follows:

69. Since this issue is capable of repetition, yet evading review, I require an Order to enjoin Defendants from not paying federal workers and from suspending the operations of the federal government on the ground Congress has not passed a budget and further request this Court direct Defendants to coin money without interest or debt under 31 U.S.C. § 5112 (k) to pay off the national debt in full or in the alternative to pay for federal employees and the operations of the federal government for all sums exceeding a budget shortfall to prevent Congress and the President from fully funding their own salaries while threatening to leave an entire branch the judiciary unfunded.

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

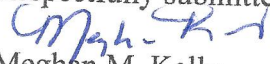
Meghan Kelly)	Civil Action No.: 1:21-1490
)	(CFC)
Plaintiff,)	
v.)	
Disciplinary Counsel Patricia B.)	
Swartz, et.al)	
Defendants.)	

CERTIFICATE OF SERVICE OF PLAINTIFF MEGHAN KELLY'S 92nd Affidavit

I, Meghan M. Kelly, Esquire, hereby certify on 9/30/23, I had a true and correct copy of the above referenced document, served to Defendants, through their counsel through email electronically:

Zi-Xiang Shen
Delaware Department of Justice
820 North French Street
6th Floor
Wilmington, DE 19801

Dated 9/30/23

Respectfully submitted,

Meghan M. Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com

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

Dated: 9/30/23

Meghan Kelly (printed)

 (signed)

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF MEGHAN KELLY’S 107th AFFIDAVIT

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

1. It is important I correct my mistaken belief. I misunderstood my US Supreme Court case manager Lisa Nesbitt. She indicated only one box was shown on the electronic filing not all three. She also indicated the petition and the appendices were not accepted as filed. I mistakenly believed Justice Alito did not have the appendices in his possession. On Friday October 27, 2023, I spoke with Lisa Nesbitt. She clarified my misunderstanding for which I am grateful. She said all of the paper copies went up to Justice Alito, even though they were not filed. If other justices reject my petition for leave of more pages all of my petition for writ of cert will be returned to me with appendices.

2. It is important to humbly admit my mistaken belief **to show why people staff in courts are necessary in the pursuit to improve the world with justice by court correction and mercy** as opposed to making the world a worse place by destroying people to eliminate every constitutional freedom by threats of government backed economic, physical or social pressure which vitiates constitutionally protected liberties as opposed to upholding them through the just rule of law.

3. Perfection is not necessary for people judges and people staff to uphold the just rule of law. Yet I believe critical thinking and discernment is by people judges with brilliant

discerning minds as opposed to deference to standardized practices or standardized automation that eliminates every individual exercise of Constitutionally protected freedom by compelled standardized lawless Satanic order rendering the Constitutional freedoms a deception and lie unprotected by the rule of law that tames lawless lusts including business greed for material gain at the cost of sacrificing other people's souls (meaning lives and liberties) and the wrong doers' soul in the fires of hell (second death to be no more). See, Bible, 1 John 5:19.

4. I am a child of God. I believe in justice in the courts is a command by God. Citing Amos 5:15, Matthe 23:23. I believe when justice is compromised to oppress the weak, powerless, needy or poor to bend to the dictates of those who buy what is not for sale freedom injustice arises and lawlessness leading to certain harm, damnation in the fires of hell and sin is protected instead of absolved through repentance.

5. In, Isaiah 10:1-4 the Bible provides:

“Woe to those who make unjust laws, to those who issue oppressive decrees, to deprive the poor of their rights and withhold justice from the oppressed of my people, making widows their prey and robbing the fatherless. What will you do on the day of reckoning, when disaster comes from afar? To whom will you run for help? Where will you leave your riches? 4Nothing will remain but to cringe among the captives or fall among the slain [in the second death in hell, bumper].”

6. It is my religious belief people are enslaved to lawlessness called sin leading to hell for doing what they are told, trained to do paid to do when they are blinded by the mark of lawlessness by desire for money to care for their own, they are blinded from seeing clearly to care for those in need at a material loss for a Godly gain. Citing *Matthew* 6:1-4. I also believe people commit lawlessness leading to hell should they not repent when they oppress, enslave, exploit, harm and even kill others under the guise of business, charity or the lie of help. Not knowing is guilt leading to hell. People will be destroyed in hell for their lack of knowledge based on hardness of heads and hardness of hearts. Citing, *Hosea* 4:6 (“My people are destroyed

for lack of knowledge: because thou hast rejected knowledge, I will also reject thee, that thou shalt be no priest to me: seeing thou hast forgotten the law of thy God, I will also forget thy children.”), *Ezekiel* 21:32 (“Thou shalt be for fuel to the fire [of the second death in hell]; thy blood shall be in the midst of the land; thou shalt be no more remembered: for I the Lord have spoken it.”); Also see, *2 Thessalonians* 2:8-12; and *Matthew* 15:14. People go to hell for seeking to get as much as they can for as little as they can to care for their own, when they have hardness of hearts towards others.

7. That is why I believe Court correction can help people know in order to love and repent from lawlessness. Some of the excuses people provide in this life are the very reasons why they will be deemed too dirty to have eternal life for selling their lives to gain the world only to lose their eternal soul in the second death. See *Matthew* 13 for example where we learn people go to hell when they allow the anxieties of chasing after money to care for their own strangles the truth from their hearts.. People judges may guide the misguided and save the victims of the wrong doers’ harm and the wrong doers soul from hell by transforming them to help them be made clean by turning away from lawlessness stemmed in barter or exchange at the cost of exchanging other folks lives to serve their own, while losing their own souls to hell should they not be made clean before it is too late. They disobey Jesus and do not love others as their own. Courts may prevent human sacrifice of lives, health and liberty through the deceit of those who reflect the image of the devil by truth to save the victims they hurt and their eternal lives. People judges are very special.

8. I did not think Justice Alito received all filings. That is why I was in tears and could not sleep the past couple of days.

9. The issue of whether an accused's case is of public record in a public proceeding should include publicly docketed petitions in the petition freely without charge accessible to the world in accordance with my asserted 6th Amendment right is capable of me as an accused is repetition yet evading review, as applied to me as a party of one. I also care about unfair treatment towards other pro se and criminally prosecuted citizens who may not assert their 6th Amendment rights based on ignorance and inability to pay for access to the law, as what has happened to me at times, or inability to hire representation, at least before the US Supreme Court. The 6th Amendment.

10. Efiling staff at the US Supreme Court previously indicated I may file an application in a different number regarding this issue, albeit I did not go into detail as to the rights I sought to assert. I desired it to be included in the application for additional pages in the PA case Justice Alito rejected. It appears I could however file a brief under Rule 44.2. Unfortunately, I was too late. On October 25, 2023 Justice Alito denied my application for more pages. I have not received the paper copy yet as of October 29, 2023, and hope to get a paper copy I may read.

11. I require time to research issues.

12. I think it fair that I be afforded time to research the 6th Amendment issues of a public record and public proceeding or at least try. Per the attached Exhibit 1, I was not able to negotiate a temporary password with Lexis. So, thorough research using Westlaw and Lexis is an issue. Exhibit 1.

13. I think it prudent to perform research first. I think it is important to stand up for the rights of myself to uphold the rights of others by precedent. It is reasonable that I desire to

time to research. Yet, I do not have easy access to Westlaw and Lexis due to poverty, even driving to the law library must be budgeted. See Exhibit 1.

14. I believe it is important that the Court not technology or third parties who create technology say what the law is. Businesses must bend to the law. The law should not bend towards business by sacrificing individual liberties, lives and health to serve I what I believe is lawlessness leading to hell business greed everyone for their own without regard to others unless it affects them. This is the mark of the beast that courts may tame to save lives and eternal lives.

15. I also require to discern which Judge may grant my application for additional pages. I think it fair that I be able to examine opinions to discern which may care to grant me justice. Per Exhibit 2 I used to have 24 hour access to the law library that was reduced to work hours. I scared Judge Stokes away from the law library by criticizing the changes he appeared to authorize. I really like Judge Stokes in real life. He has always been kind to me when talking with him in person. Plus, I think he is the most handsomely clad judge or attorney I ever saw in real life with a heart that matches by his compassion for humanity, but I was merely displeased by this one decision. I do not like it when people in power flee like me when I use my words like Judge Stokes or like the Commissioner of Insurance did when I lamented about non lawyers lawyering in DE messing up the chain of title in deeds by practicing real estate law without a license. I like to prevent problems not profit attorneys by causing problems that harm the public. We as professionals have a bit of conflict of interest. Yet, we review law makers proposals if we are participants in the bar's section meetings. I want judges to judge not even professionals in forum professional sections or law makers. Judges must balance our choices to give into temptations on harming or exploiting consumers we serve to serve our own. We need judges to judge please.

16. With regards to preventing World War III, I think are about 100 cases relating to 50 U.S.C. § 1541 where many judges cowardly avoid judging and balancing the other two branches.

17. I believe people are in danger of lawlessness called sin and hell when they make man God and demi-gods above correction by courts to guide the misguided from death into life. I am displeased by courts getting out of their jobs like children who do not uphold the law and choose lawless lusts instead by pleading “political question” which means the other two branches are not constitutionally checked but rendered above the law to serve lawless lusts and what I believe is the mark of the beast under the guise of freedom untamed and unsaved from hell by the just rule of law. My duty is to uphold the superseding Constitutional application of the rule of law, not to imperfect people who may be corrected by attorneys’ arguments to overturn case law not based on fickle fads but truth under the facts. Sometimes even judges get it wrong, and the people through attorneys or pro se cases are the check upon this branch just as the people through the vote are included in a check in the other two branches. We are saved from sin, lawlessness when we humbly turn away from evil and choose justice with mercy to improve not destroy the world or people in it.

18. Attached, is my petition to the Democrats to run against Lisa Rochester for us House Representatives without being compelled to violate my religious belief in Jesus Christ by collecting signatures and money to pay unaffordable fees to run for office. I incorporate it herein by reference.

19. The Democrats denied my request. I wanted to run for office since I kept proposing laws to improve the environment and to care for the people while I saw she talked

about it, marketed it, but was nothing than a very beautiful face with a pretty smile making a horse and pony show.

20. In 2016, I attended Chambers events and clung onto every word elected officials said. I looked at lobbyists' forums and ideas and discerned the politicians do not use their own brains which is required to discern what is right as opposed to what is marketed by those with money as allegedly popular. They conformed not with the lobbyists plans in a forced slave market, not a free or fair market.

21. I recall analyzing public radio. One year the news indicates there was not enough money as they massively laid off the older more expensive tenured teachers only to cry baby there was a teaching shortage the next few years. Why to pay untenured teachers fewer dollars. This is evil. I believe God will damn to hell those whose focus is on money, avoidance of costs, the economy, material gain at the exchange of eliminating other people's freedom by government backed economically, physically or socially peer pressured forced choice that teach the lie of Satan that human sacrifice of some is worth the lie of material gain for many. Yet I pray people repent of such wicked thinking and wicked doing so they are saved from the second death. God is merciful. I have noticed this pattern in my short years more than once

22. The Courts commit lawlessness based on lusts not the just rule of law when they plead political question when there is case and controversy.

23. The Courts our hope of a hero to save lives, eternal lives, the government, the world and the just rule of law from schemed elimination of the law to a time of lawlessness.

24. Yet the courts must be brave and humble not prideful by willingness to mess up as they seek to do what is right. This flashy show of conformity eliminates individual liberty under the deception of forced conformity with the mob or past case law is fair. Should the case

law be wrong or should individually exercise of liberties not conform to the exercise of religious belief with the majority it is not fair nor based on preserving freedom but slavery to the standardized lawless order that eliminates the Constitutional laws' protections by destroying the law under the color of upholding the same.

25. I am troubled by Justice Scalia's haunting words making the other two branches above the law unchecked and imbalanced per *Lebron v. Rumsfeld*, 764 F. Supp. 2d 787, 79612-797 (D.S.C. 2011):

“In *Sanchez-Espinoza v. Reagan*, 770 F. 2d 202 (D.C. Cir. 1985), the Court of Appeals for the District of Columbia addressed claims by persons asserting that they had been injured by allegedly illegal government action in support of the Contras in Nicaragua. Then **Judge Scalia, writing for his court, concluded that in the areas of military and foreign policy the courts "must stay our hand" because the courts lacked the "institutional competence"** to fashion appropriate damage remedies. Where there exist a "host of considerations that must be weighed and appraised" then "we must leave to Congress the judgment whether a damage remedy should exist." Id. at 208-09.” Thank you for your time and consideration.

26. The Courts are competent and are required to judge and limit the other two branches and its own branch within the Constitutional application of the rule of law. Third parties are not competent to regulate and judge judges outside the scope of the Constitution.

27. With that said, should we face the threat of WWIII it is the courts not money or military might who are the world's hope of a hero to save lives and eternal lives.

28. I see in *Flynn v. Shultz*, 748 F.2d 1186, 1192 n.5 (7th Cir. 1984):

“It is an unsettled question whether a direct conflict between the Executive and Legislative branches regarding United States foreign policy presents a nonjusticiable political question or a resolvable controversy regarding the apportionment of power among the branches of government under the Constitution. Compare *Goldwater v. Carter*, 444 U.S. 996, 997, 100 S.Ct. 533, 62 L.Ed.2d 428 (Justice Powell, concurring); *Olegario*, 629 F.2d at 218; *Mitchell v. Laird*, 488 F.2d 611, 614 (D.C. Cir. 1973); *Crockett*, 566 F. Supp. at 898, with *Goldwater*, 444 U.S. at 1002, 100 S.Ct. at 536 (Justice Rehnquist, concurring). In the present case, the defendant has not argued that Section 1732 in any way impinges on his constitutional power to conduct foreign relations and consequently no political question issue of this type is before us.”

29. I understand an attorney must make arguments of standing separate from the universal harm “individual and particularized.” Maybe my unique religious beliefs and exercise may grant the same. I have ideas on using RFRA along the Wars Power Resolution, yet I have to focus on my own case. I need time to think things out. Know I care about the country and do not want it to be overthrown or schemed after 2050. I just do not have the means to ask the court to save itself and to save us now as I work on requirements of today. I do not want people to go to hell, not even judges enslaved to lawlessness called sin. I believe lawyers should be permitted to guide misguided judges too who create injustice by decisions which do not uphold the Constitutional law. I believe it may save lives, health, liberty and eternal lives, and we should not get into trouble for seeking to uphold justice as opposed to serving injustice by compromising what is right to serve what is convenient or profitable to those in power.

30. I am quite distraught about potential loss of additional liberties, claims and licenses. PA Supreme Court is aware my license was placed as lost in the Eastern District court and they sought to place it on disabled not lost per the attached Exhibit 6. I do not want PA ODC to sue me again for information I already provided to him while we previously were before the PA Supreme Court should I not overturn the Order by appeal on December 26, 2023 in that case. That is not fair, but the courts have not behaved fairly towards me by firing witnesses to conceal their testimony in my cases or by sealing my petitions in violation of 14th Amendment procedural due process and my First Amendment right to petition to defend my First Amendment rights of religious belief, association, exercise of religious belief and protected speech outlining the same in the petitions. Then, by approving these unconstitutional acts with reciprocal without permitting me the asserted opportunity to cross examine my accusers which was violated in the initial case. US Amen VI.

31. Should my case not be overturned then the courts uphold the mark of the beast in order to buy and sell as a licensed professional and lawlessness leading to hell by sacrificing individual liberty for mammon as God may arise. Matthew 6:24. Then, know lawlessness and the elimination of the courts and the just rule of law by compromising the courts in order to allow the arguments they are no longer needed will occur.

32. I am quite sad at this threat. Yet, I am hopeful the courts may choose to be our hero. I must not give up. When I seek to correct people judges like DE Supreme Court or even Justice Alito with regards to violating my right to fair access to the courts, it is to preserve Constitutional application to the just rule of law by preserving the law from partiality towards judges who apply them in violation of the 5th and 14th Amendment Equal Protections component which will be used to impeach and eliminate people judges. I seek to improve and preserve not destroy the law, liberties including my own and people judges. I uphold the law by requiring judges adhere to the law in court without compromise.

Thank you for your time and consideration.

Dated

10/29//23

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

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

Dated: Oct. 29, 2023

Meghan Kelly (printed)

Meghan Kelly (signed)

Exhibit 1

Thank you Peggy Fw: Lexis+ AI is here/Meg is a little scared of AI/

From: Meg Kelly (meghankellyesq@yahoo.com)

To: margaret.naylor@delaware.gov

Cc: meghankellyesq@yahoo.com

Date: Friday, October 27, 2023 at 08:31 AM EDT

Hi Peggy,

My apologize our phone call was interrupted. My sparkle at negotiating free trials may be extinguished. I think it fair that I have an opportunity to research something first before filing it before the US Supreme Court.

I was thinking about coming in when I would have the most time 8:30 to 4, maybe next week.

Are you out any days?

Thank you for your help.

Very truly,
Meg

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

From: Baird, Anthony (LNG-DAY) <anthony.baird@lexisnexis.com>

To: Meg Kelly <meghankellyesq@yahoo.com>

Sent: Tuesday, October 24, 2023 at 11:49:40 AM EDT

Subject: RE: Lexis+ AI is here/Meg is a little scared of AI/

Hi Meg,

I can understand your concern with AI. I can assure you that Lexis has top notch security, privacy and content in place to give attorney's confidence in our tool.

It does not come with a trial of Lexis. I see that you've utilized a handful of trial IDs over the years. Do you have any interest in getting something permanent in place to help with your cases?

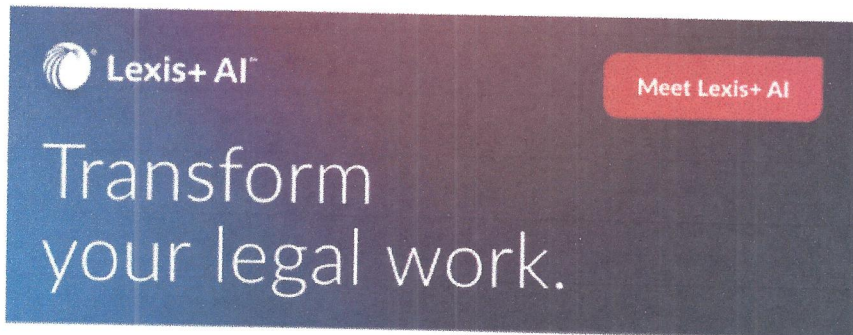
Best,

Anthony Baird


Account Executive I 937.247.0280

LexisNexis Legal & Professional

[Schedule Meeting with me](#)



From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Tuesday, October 24, 2023 10:53 AM
To: Baird, Anthony (LNG-DAY) <Anthony.Baird@LexisNexis.Com>
Cc: Meg Kelly <meghankellyesq@yahoo.com>
Subject: Re: Lexis+ AI is here/Meg is a little scared of AI/

 **!!!CAUTION - You have little to no email history with this sender meghankellyesq@yahoo.com. This email could POTENTIALLY be a Phishing attempt - If you are unsure - DO NOT REPLY or Open Links/Attachments CAUTION!!!!**

*** External email: use caution ***

Hi Anthony,

I am a little scared about AI.

I prefer the normal Lexis. Does it come with a trial of Lexis?

Thank you,

Meg

On Tuesday, October 24, 2023 at 10:43:48 AM EDT, Baird, Anthony (LNG-DAY) <anthony.baird@lexisnexis.com> wrote:

Exhibit 2

Exhibit 2

21-1490/21-3198.Fw: Judge stokes retired

From: Meg Kelly (meghankellyesq@yahoo.com)

To: anthony.sodroski@pacourts.us; zi-xiang.shen@delaware.gov; david.weiss@usdoj.gov

Cc: meghankellyesq@yahoo.com

Date: Thursday, November 10, 2022 at 09:19 AM EST

Good morning,

Attached, please find the complete post which reflected my recollection of the approximate date people talked about shooting me which made me even more scared as the news discussed political and religious attacks thereafter. This is a reason to prompt me to file Kelly v Trump to dissolve the establishment of government religious beliefs, which incited economic, physical or social persecution against those who are not perceived as sharing such beliefs.

Please note, Judge Stokes is the judge I scolded. I told Judge Stokes while we both were at the law library I was disappointed in him for limiting access to the laws we needed to do a good job. He fled the law library. I have high regards for Judge Stokes. He is kind. I merely was disappointed that I, and others like Karl Haller, and possibly judges like Judge Horn, who frequented the law library to pull laws, could no longer go there after hours. This was pre-pandemic.

Thank you,

Meg

Meghan Kelly

34012 Shawnee Dr.

Dagsboro, DE 19939

meghankellyesq@yahoo.com

(302) 493-6693

Not acting as an attorney acting on behalf of another

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

From: Meg Kelly <meghankellyesq@yahoo.com>

To: Meg Kelly <meghankellyesq@yahoo.com>

Sent: Thursday, November 10, 2022 at 06:50:07 AM EST

Subject: Judge stokes retired

Sent from my iPhone



IMG_1545.jpg

1.5MB



See your memories >



Meg Kelly

November 8, 2019 · 🌐

I am having the worst day ever!!!

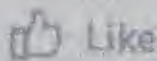
On the ride to Georgetown this morning, a cute old lady with white hair grimaced at me and gave me the middle finger.

Two people yesterday talked about me getting shot for my impeachment stickers. Do me a favor. STOP talking about shooting me please because someone may actually shoot me. I do not want to die. I want to live and speak life.

Today, I was disarmed. The law library no longer will be open after hours. How will I use my brain to combat bucks and bullets. How will I defeat people with words NOT weapons without access to the law library at all hours. I feel like a part of my body was removed. I cried. I told a chief judge I was disappointed in him. I am. Why remove the tools to resolve conflicts peacefully? Has Trump gotten to them too.

Words are powerful.

Love you.



Like



Comment



Write a comment...



DOW -1.95%

Exhibit 3



Ms. Meghan Kelly
34012 Shawnee Drive
Dagsboro, DE 19939

February 3, 2020

Dear Ms. Kelly,

The Delaware Democratic Party (the "Party") is in receipt of your October 28, 2019 letter requesting a waiver of certain filing fee and signature requirements. In keeping with current party practice and to maintain the integrity of the primary process, the Party declines to reduce, modify or waive any filing fees for any candidate. We note that you may contact the Delaware Department of Elections for additional information regarding statutory requirements and the ability to seek a waiver thereof from that office in certain circumstances.

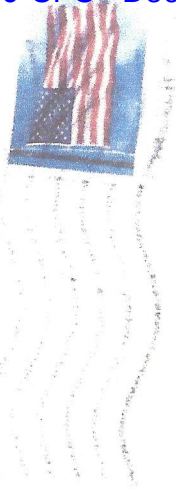
Respectfully,

Erik Raser-Schramm
Chairman, Delaware Democratic Party

DELAWARE

DEPARTMENT OF REVENUE
100 COMMERCE CENTER
DOVER, DE 19901

RECEIVED
FEB 20 2023



Meghan Kelly
34012 Shawnee Drive
Dagsboro, DE 19939

199094125

199094125

Exhibit 4

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939
(302) 537-1089

The Honorable Democratic Chair Erik Raser-Schramm
Delaware Democratic Party
19 E Commons Blvd.
New Castle, DE 19720

(302) 328-9036
C/O Jesse Chadderon
jesse@seldemsorg
C/O erikjschramm@gmail.com
C/O delaware@deldems.org

RE: Meghan Kelly, Waiver State Filing Fees & Signature Requirements, President

October 28, 2019

Dear Honorable Democratic Chairman for the state of Delaware, Erik Raser-Schramm:

I desire to run for House of Representatives for the state of Delaware.

Unfortunately, in order to successfully run, I would have to violate my religious beliefs.

Thus, I am writing to respectfully seek a waiver each the signature and fee requirements to allow me to be on each state's ballot in each of the three counties without violating my religious beliefs.¹

¹ The Democratic Chair has the power to waive fees. See, *Bartley v. Davis*, No. CIV.A. 8561, 1986 WL 8810, at *1-2 (Del. Ch. Aug. 14, 1986), *aff'd*, 519 A.2d 662 (Del. 1986), (The Honorable Chancery Court noted, "This [filing fee] requirement has long been a method to effectuate the above purposes and past political practice, according to the Chairmen of the Delaware Democratic and Republican Parties, has permitted this requirement to be waived.")

The Honorable Supreme Court, on appeal, noted that the party Chair only has statutory authority to waive such fees prior to the filing deadline. ("Attempted filing fee waiver of democratic state chairman, acting for democratic state committee after notification date, was invalid. 15 Del.C. §§ 3103(c), 3106." *Bartley v. Davis*, No. CIV.A. 8561, 1986 WL 8810, at *5 (Del. Ch. Aug. 14, 1986), *aff'd*, 519 A.2d 662 (Del. 1986), Citing, *Bartley v. Davis*, 519 A.2d 662 (Del. 1986)").

Also see, *Belitskus v. Pizzigrilli*, 343 F.3d 632 (3d Cir. 2003) ("State's power to regulate elections must be exercised in a manner consistent with the Equal Protection Clause of the Fourteenth Amendment. U.S.C.A. Const. Art. 1, § 4, cl. 1; U.S.C.A. Const. Amend. 14.") *Id.* ("When First and Fourteenth Amendment rights are subjected to severe restrictions under state election regulation, the regulation must be narrowly drawn to advance a state interest of compelling importance; however, when a state election law provision imposes 1 only reasonable, nondiscriminatory restrictions upon the First and Fourteenth Amendment rights of voters,

I am a Christian, and I find guidance in the Bible. Pursuant to the Bible, Jesus says, "The greatest among you is your servant." (Citing, Matthew 23:11). Accordingly, living to serve self is not great. In fact, I believe the root of corruption in both business and government is serving those who serve you, thereby serving yourself, instead of the people you are supposed to serve.

We are called to love those beyond our own even our opponents. I believe people sin against God when they merely serve their own children and families, and those who serve or affect them, instead of all the people they are appointed to serve in their position

the State's important regulatory interests are generally sufficient to justify the restrictions. U.S.C.A. Const.Amends. 1, 14"); Id (Indigent candidates' "as applied" equal protection challenge to Pennsylvania's mandatory filing fee requirements was not moot under "capable of repetition, yet evading review" exception to mootness doctrine, although election in which they ran had been held; challenge was too short in duration to be fully litigated prior to its expiration, and given lack of evidence to the contrary, it was reasonable to assume that the candidates would once again seek waiver of mandatory fees due to indigency. U.S.C.A. Const.Amend. 14; 25 P.S. § 2873(b.1).")

Also see *Biener v. Calio*, No. C.A. 02-514 GMS, 2003 WL 151232, at *2 (D. Del. Jan. 21, 2003), *aff'd*, 361 F.3d 206 (3d Cir. 2004) ("A person desiring to be a candidate for statewide office must tender a copy of the Candidate Filing Form to the chair of the state committee of his or her political party, and must further tender a copy of such Form, along with the required filing fee, to the Commissioner. Del.Code Ann. tit. 15, § 3106(a)(1)(b).").

Please allow me to tender such form without fee or signatures requirements PLEASE. Please give me a chance to run for House of Representatives without selling my soul by compromising my integrity and belief in Jesus Christ for an opportunity to help others. Compromising my faith will hurt those I hope to serve. Cheating to win matters. It is wrong. Cheating God matters to me. Breaking Jesus's command in Matthew 6 is cheating. Should I be elected, I will safeguard the Constitutional laws we all hold dear by impeaching the President should he be reelected. Please also give me a chance to draft federal laws that make the wealthy wrong doers instead of the victims of their greed and tax payers pay for alleviating the harm they cause. Please, I beg of you. I am analyzing the laws. America will not be okay down the line unless we choose to alleviate the economic strains instead of profiting from them. We must serve the people, not exploit and harm them for profit.

The negative consequences of deregulation and the defunding of the federal government that will impact Delawareans down the road is the greatest issue legislators must address, and not hide from. We need to prepare for what is ahead, a short fall of expected federal funds, which will lead to a short fall of state and local funds. Deregulation sounds great until you realize you must increase local taxes to pay for things or go without. The Federal government gives money to Delaware, in part, under its authority under Article I Section 8 of the Constitution, the Spending Clause. Delaware receives money with strings attached, called regulations. If Delaware doesn't adhere to the regulations, we do not receive money. As the federal government deregulates, it will continue to defund programs in Delaware. That means state and local governments must pay for more or go without. We must also prepare for the removal of environmental laws by the Federal Government to prevent harm by creating policies and local laws to protect, preserve and maintain our beautiful beach environment.

of life.. Jesus said even evil people care for their children. (See, Matthew 7:9-12, "Which of you, if your son asks for bread, will give him a stone? Or if he asks for a fish, will give him a snake? If you, then, though you are evil, know how to give good gifts to your children..."). Jesus said even those without God love those who love them, and greet those who great them. (See, Luke 6:32-35, "if you love those who love you, what credit is that to you? Even sinners love those who love them. And if you do good to those who are good to you, what credit is that to you? Even sinners do that. But love your enemies, do good to them, and lend to them, expecting nothing in return. Then your reward will be great, and you will be sons of the Most High; for He is kind to the ungrateful and wicked"); (See also, Romans 12:14); (See Matthew 5:44-45, "But I tell you, love your enemies and pray for those who persecute you, that you may be sons of your Father in heaven."); (Matthew 5:46-47, "If you love those who love you, what reward will you get?... And if you greet only your people, what are you doing more than others? Do not even the pagans do that?").

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.).

Leaders who serve themselves and those who serve them are not good leaders. They are servers of self not public servants. 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.

In Ezekiel Chapter 34:1-10, God scolds leaders, shepherd who take advantage of the sheep to serve themselves instead of caring for them. "Woe to you shepherd of Israel who only take care of yourselves! Should not shepherds take care of the flock? You eat the curds, clothe yourself with wool and slaughter the choice animals, but you do not take care of the flock...." Id.

My religious beliefs prevent me from gathering enough money to pay people to help me collect signatures and pay filing fees. I will not collect fees from individuals or lobbyists as this violates my religious beliefs against partiality and favoritism, serving those who serve me, thereby serving myself, by potential invisible strings attached to such donations.

The caveat is, I would be willing to accept donations from the democrat party as they cannot buy me or influence me since I am already a Democrat. I am a Democrat because they love people, not money. Democrats tend to serve people, not greed. I believe people go to hell for seeking money in place of God. (See Matthew 6:24, and Luke 16:13, "You cannot serve God and money."). (See, Luke 19:45-48, Malichi 3:1-3, Matthew 21:12-13, Mark 11:15-19, John 2:13-17, Jesus chased people out of the temple for stealing the real treasure, people's eternal lives), (See, Matthew 23:15, Jesus told the leaders they were making their followers twice as worthy of hell as they were since the leaders taught them to focus on money instead of God.) I would be a misleader, not a leader, if I taught people to serve greed instead of teaching them to care for one another since I believe serving greed leads many 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."

I am a leader because I think for myself after analyzing facts and laws. I will seek to do what is in the best interest of the American people, not what immediately pleases

some of their immediate desires only to harm them down the line. That is wrong. I take responsibility for my decisions made on behalf of others, and I will not be influenced by money or support. I do not believe the Democratic parties in each state will support me though I support their love for people and the environment over profit. I am against two positions the party heads seem to support. ²

² Some Democratic leaders support abortion and death with dignity acts. I do not encourage or support abortion and the death with dignity acts. I believe they harm people, or potential people not only here, but in eternity too. I would be a bad leader if I led people I served to harm people or themselves for mere temporary ease, comfort or profit. I am against abortion. I do not believe they go to heaven. I believe they were robbed of the opportunity to be born of flesh and born of spirit. (See John Chapter 3:3-8, "Jesus replied, Very truly I tell you, no one can see the kingdom of God unless they are born again. ... 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 gives birth to spirit..."). Accordingly, the potential people not only lost life in this life, they lost eternal life too.

I am also against the Death with Dignity Acts. Many people may make mistakes, even professionals and experts such as doctors and health care professionals. None of us are gods. They may misunderstand or may lie for money or convenience. So great injustice may result. Ignorance or error will not reverse the harm done.

Further, I believe people may go to hell for killing themselves. It is not loving to encourage those you serve to die and go to hell out of convenience, comfort, martyrdom for the temporary convenience for themselves or other people, or to save money. People are more valuable than money, things or comfort. There are two examples of people who killed themselves and went to hell in the bible. King Saul in the Old Testament, and Judas Iscariot.

Pursuant to 1 Samuel 31:4, "...Saul took his sword and fell on it." Saul killed himself. In 1 Chronicles 10:13 provides, "Saul died because he was unfaithful to the LORD; he did not keep the word of the LORD..." I do not believe he went to heaven because of these words.

The other example is Judas Iscariot. In Matthew 27:1-10, Judas said sorry, confessed his sin, gave the 30 shekles back. Unfortunately he gave into despair instead of repenting by faith and trust in God's love and mercy. He killed himself instead of living to love God and love those God loves, everybody even our enemies.

In John 17:12, Jesus says, "he was doomed to destruction." So, I do not believe Judas escaped Satan's goal damnation.

I believe we live or die for God. Citing, Romans 14:8. Those who live and die for self or for mere people instead of God do not go to heaven. 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. Citing, Matthew 10:37. 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. How? Through the righteousness of Abraham. Abraham believed what God said. His belief was attributed to righteousness. Citing, Genesis 15:6. Abraham listened to God to the point he was willing to sacrifice his own son. This righteousness was attributed to Lot when he listened to God's word. He did not even turn around when his wife turned into a pile of salt. See, Genesis 19:26. Thus, we should obey the greatest command to love God and love others. Love does not encourage harm in this life and eternal life for mere material convenience. ⁴ See, Romans 13:10.

My beliefs are genuine. I ran for local office and espoused the same beliefs on collecting donations and fundraising. (Please see Exhibits, 1, 2, 3, 4).

My faith in Christ 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, 5).

I twice rejected appointments to family law matters as violating my religious beliefs (See Exhibits 6, 7).

I confronted the Courts in Delaware per the attached letter concerning impartiality and bias. (See Exhibit 8); (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.").

I am against the Death with Dignity Acts because I believe the most important time of our lives is at the end pursuant to the Bible. In Ecclesiastes 7:1, "the day of death better than the day of birth." In Ezekiel, the Bible says if you do good all of your life and turn away from the good, none of the good will be remembered. In Ezekiel, it says if you do evil all of your life and turn away from the evil, none of the evil will be remembered. (See, Ezekiel 18:21-24, Also see Ezekiel 33:12-16). Further, in the Parable of the Sower in Matthew Chapter 13, only those who understood and kept the truth in the end were saved from hell. Also in Matthew 24: 13, we learn that only those "who stand firm in the end" will be saved.

On an aside, I believe non Christians may go to heaven (or hell) through Jesus on that last day. See, Hebrews Chapter 11. Also see many verses about the new covenant written on our hearts. When I think of tribes in unreachable parts of the land I think of Romans 2:15. "They show that the requirements of the law are written on their hearts, their consciences also bearing witness, and their thoughts sometimes accusing them and at other times even defending them." See also, Jeremiah 17:1, Nehemiah 7:5, Ezekiel 36:26 relating to God's law or God written in our heart..

I understand with the acceptance of the cloak of government power I will lose some of my power to speak on my personal religious beliefs in order to uphold the freedoms of those I serve and prevent a chilling effect.

I even shared my view on what using the name of God in vain means when I proposed a suggestion to Senator Tom Carper of Delaware. (See, Exhibit 9). I believe it means using the name of God, or religion or scripture for man's purpose instead of a true religious purpose.

I believe it would be wrong to collect donations from those outside of the Democratic party such as lobbyists and people as it would create the appearance of influence and favoritism in violation of the bible's teachings as we are called to serve everyone's best interests, not merely those who support us, or pay us with lobbyists money. That is a sin against God. (See, James 2:, "do not show favoritism."); (James 2:9, "But if you show favoritism, you sin and are convicted by the law as transgressors."); (Deuteronomy 16:19, "Do not deny justice or show partiality. Do not accept any bribes, for a bribe blinds the eyes of the wise and twists the words of the righteous."); (Proverbs 18:5, "Showing partiality to the wicked is not good, nor is depriving the innocent of justice."); (Proverbs 24:23, "These also are sayings of the wise: To show partiality in judgment is not good."); (Malachi 2:9, "So I in turn have made you despised and humiliated before all the people, because you have not kept My ways, but have shown partiality in matters of the law."); (Job 34:19, "who shows no partiality to princes and does not favor the rich over the poor, for they are all the work of his hands?"); (Job 13:10, "Surely He would rebuke you if you secretly showed partiality.").

Accepting donations from lobbyists and individuals creates an expectation of a return in violation of God's instructions. In Romans 13:8 the Bible teaches: "Owe nothing to anyone except for your obligation to love one another..." The acceptance of

money from individuals and lobbyists creates an appearance that I am bought. That violates the bibles teachings on impartiality.

I believe it would be wrong to pay a team to support me by gathering signatures in various states. I would be buying votes, by buying support. That is wrong. Votes should not be bought. I should not earn support with money. I should try to gain support with true leadership, love for others, by service to others by presenting my plans to take care of Americans relating to healthcare, social security, and the environment.

On an aside, to alleviate your fears, I understand there are not only checks and balances within the three branches of government, there are also internal checks and balances within each of the individual branches. With the acceptance of the cloak of government authority, I understand my rights will be more limited in order to uphold those I hope to serve. My rights to speak out on my faith will be more limited in order to uphold the religious freedoms of the American people should I be elected. Americans should worship or not according to the dictates of their own conscience, not the dictates of the government. I will treat everyone with respect regardless of religion, race, gender or place of origin. I am not scared to love those outside of my own. I am commanded to.

Since, I do not wish to violate the Bible's teachings on impartiality, I respectfully, request that each state's filing fees and signature requirements be waived.³

³ See, Fraternal Order of Police Newark Lodge No. 12 v. City of Newark, 170 F.3d 359 (3d Cir. 1999) "... denial of religious exemption to no-beard requirement violated free exercise clause."

Also see, Black Hawk v. Pennsylvania, 225 F. Supp. 2d 465 (M.D. Pa. 2002), aff'd sub nom. Blackhawk v. Pennsylvania, 381 F.3d 202 (3d Cir. 2004), (By analysis of this case, I am required to prove that my free exercise of religion has been substantially burdened. U.S.C.A. Const.Amend. 1. I have met such burden).

See, Military Selective Service Act of 1967, § 6(j), 50 U.S.C.A. § 456(j); U.S.C.A.Const. art. 1, § 8, and Gillette v. United States, 401 U.S. 437, 91 S. Ct. 828, 28 L. Ed. 2d 168 (1971); Welsh v. United States, 398 U.S. 333, 90 S. Ct. 1792, 26 L. Ed. 2d 308 (1970), (In these cases, the Plaintiffs claimed a religious exception for a belief that was unpopular by many well connected, powerful and wealthy people of their time. My beliefs concerning abortion and the death with dignity acts are unpopular by many democrats. Yet, I am a life long democrat and support their love for people instead of love and exploitation and harm to people to

In addition to and in the alternative of, I also seek a waiver since I currently can not afford to pay the filing fee, and can not afford to pay for travel and expenses to collect signatures.⁴ It against my religious belief to ask others to volunteer to do it on my behalf.⁵

serve pockets, despite the fact many within my party oppose these two views. I will gain votes by non party members for my honesty.

⁴ Lubin v. Panish, 415 U.S. 709, 94 S. Ct. 1315, 39 L. Ed. 2d 702 (1974); (Process of qualifying candidates for a place on the ballot may not constitutionally be measured solely in dollars. U.S.C.A.Const. Amends. 1, 14, 25, 26; Voting Rights Act of 1965, § 2, 42 U.S.C.A. § 1973”); Id. (“Legitimate state interest of maintaining integrity of elections must be achieved by a means that does not unfairly or unnecessarily burden either a minority party's or an individual candidate's equally important interest in continued availability of political opportunity. U.S.C.A.Const. Amends. 1, 14, 25, 26; Voting Rights Act of 1965, § 2, 42 U.S.C.A. § 1973.”);

Distinguish (Cassidy v. Willis, 323 A.2d 598 (Del.), aff'd, 419 U.S. 1042, 95 S. Ct. 613, 42 L. Ed. 2d 636 (1974), The Court held, Statutes providing for filing fees for candidates in primary elections, as applied to potential candidates who were financially able but unwilling to pay fees in question, were not invalid under equal protection clause of the Fourteenth Amendment. 15 Del.C. §§ 3104, 3107; U.S.C.A.Const. Amend. 14.” I can not afford to pay the filing fee and desire to run as soon as possible to ensure a fighting chance).

⁵ Asking for volunteers is a sin against God. It violates Jesus Christ's teachings in Matthew 6. I am a Christian. I believe Jesus Christ. In Matthew Chapter 6 Jesus says "Do not give charity seen." Give in secret, not knowing your left hand from your right. Meaning do not give out of one hand (donate time or money, or favors or such), to get out of the other, (for jobs, to be seen, cheap marketing, favors, good deeds).

I believe donations seen wrongly teaches conditional giving is unconditional love, glorifying the punishment as the reason to live, business and family instead of unconditionally respecting, loving God and others, even those who do not benefit you, including your enemy.

I also believe that charity wrongly teaches giving money, or volunteering seen is good. So, people wrongly learn those who do not contribute money can not be good. This leads some people to call poor people bad people. Instead of loving the poor, people learn to condemn them. That is wrong. I do not want to mislead people. I desire to lead people by serving them in truth with love.

On an aside I believe the punishment “toiling in the soil” and “desire for your husband,” even though they are hairy and fart, (we really do desire them), and child birth is for edification. It teaches us to care about others, albeit conditionally. We learn by baby steps before taking leaps in learning to love unconditionally by respecting the dignity of all people regardless of race, religion or place of origin. The purpose of the punishment is a bit loving like a father placing a child in a time out when they run into the road. The punishment is teaching out of love for the child, to prevent loss of life and eternal life.

I believe the reason we exist is because God loves us, all people regardless of race, religion or place of origin. “We love because he first loved us” 1 John. 4:19. Sadly some glorify the fruits of the punishment, money and the things it can buy or imperfect people who let us down or die, when the purpose is glorious, love. The punishment is merely part of life, not the main purpose.

Those who respect money instead of people have not accepted love, (God), in their hearts. Scripture teaches “God is love.” 1 John 4:8 and 16. Instead of love, they have emptiness in their hearts. Love them anyways, in hopes they can be filled by your love. Love does not encourage harm in this life or the next by false assurance.

I made up a mnemonic Accept it. Reflect it. Don't suck it like Satan. Meaning do not suck light (truth in

Further, in addition to and in the alternative of, I have severe allergies that prevent me from obtaining signatures by going outside without the threat of illness.⁶

love), life and love from the world. This causes death, damnation and serves the one “who has power over death, the devil.” Hebrews 2:14. Yet so long as we have life, we can turn away from such empty lives and be saved.

The power of the legislative pen, is the power to save souls or mislead them to hell. It allows leaders to teach those they serve to care about other people, because God loves other people too, or get corrected in Court or by affecting what they care about money in hopes to warm cold empty hearts with eternal life saving love. I think of these laws as just laws. Unjust laws teach people wrong. See, 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.”) Unjust laws mislead people to harm and hell. See, Isaiah 10:1, “Woe to those who make unjust laws, to those who issue oppressive decrees,”). They glorify money and business and teach people to exploit and harm one another causing not only economic harm but harm to lives and health. Unjust laws glorify the wrong doers as they exploit and harm the masses for profit. Yet, the masses praise them since they give charity seen, sinning against God. The masses praise them since the deep pocketed wrong doers buy the politicians who train us to praise those who help them in elections. Throughout the history or law and politics, wrong doers are praised. See, Habakkuk 1:4 (“Therefore the law is paralyzed, and justice never prevails. The wicked hem in the righteous, so that justice is perverted.”); also see, Amos 5:7 (There are those who turn justice into bitterness and cast righteousness to the ground.). Then when light is shed on the harm they caused, they plead ignorance. Yet, ignorance is not innocence in this life or the next. 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.”), Proverbs 8:33, also see Romans 10:3 (“For they being ignorant of God’s righteousness, and seeking to establish their own righteousness, have not submitted to the righteousness of God.”), Hebrews 2:3 (“how shall we escape if we ignore so great a salvation?”), 1 Timothy 1:19, (“ with faith and a good conscience. By ignoring their consciences, some people have destroyed their faith like a wrecked ship.”), Matthew 13 (Only those who understood were fruitful/meaning lived (eternal life)). Wealthy men often choose to ignore foreseeable harm because they choose not to care, to be inconvenienced, to compromise their profit. I choose to care. I will not sell my soul for the dollars needed to get on the ballot. Please allow me to combat the foreseeable harm by drafting just laws, and if needed continuing drafting articles of impeachment, should the need remain if President Trump is reelected. I drafted 4 and suggested 5 to all 541 of our congress people. I love you, and I love people. Thank you. See, Amos 5:24 (“But let justice roll on like a river, righteousness like a never-failing stream!”)(Note, MLK cited this).

See, *Masterpiece Cakeshop, Ltd. v. Colorado Civil Rights Comm'n*, 138 S. Ct. 1719, 201 L. Ed. 2d 35 (2018) (“The Free Exercise Clause bars even subtle departures from neutrality on matters of religion. U.S.C.A. Const.Amend. 1.”); (“The First Amendment ensures that religious organizations and persons are given proper protection as they seek to teach the principles that are so fulfilling and so central to their lives and faiths. U.S.C.A. Const.Amend. 1.”); *Id.* (“The Constitution commits government itself to religious tolerance, and upon even slight suspicion that proposals for state intervention stem from animosity to religion or distrust of its practices, all officials must pause to remember their own high duty to the Constitution and to the rights it secures. U.S.C.A. Const.Amend. 1”); Also see, *McDaniel v. Paty*, 435 U.S. 618, 98 S. Ct. 1322, 55 L. Ed. 2d 593 (1978) (This case is distinguished because the statute is discriminatory on its face, instead of as applied. Yet, I like the beautiful language and would probably cut and paste the Courts wise analysis to teach respect for people under the law who think differently, even people like me.).

⁶ *Graveline v. Johnson*, 336 F. Supp. 3d 801 (E.D. Mich. 2018) (Michigan ballot access statutes, requiring independent candidates to collect 30,000 signatures, were unconstitutional as applied.).

To appease your concerns, I know my freedom to speak will be reduced should I be elected. I will live my faith by loving others. I will safeguard separation of church and state.

Thank you for your time and consideration.

Very truly,

/s/Meghan M. Kelly
Meghan Kelly, Esquire
DE Bar Number 4968

Where is the beach?

*Vote
Meghan Kelly
38th District*



Save the Beach!

I am a Democrat, but I intend to serve everyone. So, regardless of party affiliation, I would love to hear what is important to people within the community. People may feel free to contact me at 302-537-1089 or electmegkelly@icloud.com. Otherwise, I hope to see people at walk and talks.

I received permission from Bethany to informally meet with people at the Bethany Beach Board walk, every third Saturday, at 5:00 PM to "walk and talk" with people. I am copying Delaware Senator Bryan Townsend's "walk and talks" as they seem like a free, fun, fit way to talk with people in the community. I look forward to meeting people. Please dress down and wear comfortable shoes.

I am not going to accept monetary donations during my campaign, to prevent the appearance of undue influence or favoritism, except by the Democrat party. Nor am I going to give monetary donations, or attend events that require fees as that may make the appearance of buying votes. So, I intend to attend free events, such as chamber events, economic development meetings, environmental groups, town hall meetings, and other events that will not cost attendees or me any money.

I was thinking about doing fundraisers at restaurants, but I changed my mind when someone asked me to go to a dinner fundraiser "because it would be good for my campaign." I immediately thought of scripture. "Everything they do is done for people to see...They love the place of honor at banquets and the most important seats in the [places of worship]; they love to be greeted with respect in the marketplaces...". Matthew 23:5-7

I should not go to events merely to be seen as allegedly giving to charity. Due to my religious beliefs as a Christian, I do not believe this is true charity. Instead it is self serving. I do not want to be a hypocrite and turn people away from a good God by such deceptive choices. I believe it is better to help in secret rather than openly participate in charitable events or provide funds to fundraisers, groups and charities. I respect other people's religious beliefs. So, I hope they respect my dedication to my faith too.

Thus, I strive to give to those in need directly without recognition, financial gain, cheap marketing, or tax breaks. Please see the Bible, NIV version Matthew 6:1-4 which provides:

"Be careful not to practice your righteousness in front of others to be seen by them. If you do, you will have no reward from your Father in heaven. So when you give to the needy, do not announce it with trumpets, as the hypocrites do in the [places of worship] and on the streets, to be honored by others. Truly I tell you, they have received their reward in full. But when you give to the needy, do not let your left hand know what your right hand is doing, so that your giving may be in secret. Then your Father, who sees what is done in secret, will reward you."

Accordingly, I perform charitable work in secret. I have dropped off clothing at schools where there is a higher poverty rate. I have given food to those in need directly. I have never held an official position in my church, St Anne's, located in Bethany beach, but I have helped out when requested through prayer, participation in plays, filling in for Sunday School teaching and other similar activities.

By the way, I do not believe there is any shame when people cannot afford to give to others in need. After all in the bible in Acts, Chapter 3, Peter gave no money to a beggar.

People should not feel shame because they have nothing to give either. So many are struggling here and across our nation. I do not want to mislead them into hurting themselves financially.

People are not somehow good people merely because they are rich, nor are people somehow bad people because they are poor.

Please note, I am respectful of my colleagues beliefs relating to charities, and I applaud others for helping one another in the manner they think best.

During this election, I will not give attorney advice. I reserve the right to provide any and all information to another attorney (or seek relief on my own), should I discover unlawful conduct.

Do not call me for legal advice please.

No favors because I know you when I am elected. People should be hired or receive funding based on how well they will perform a job. It is wrong to merely serve those who serve me. I need to look out for all of the constituents.

Thank you for supporting me in serving you.

Meghan Kelly, Esquire
Licensed DE, DC, PA, US Supreme Court
electmegkelly@icloud.com

Vote

Meghan Kelly
38th District

*Paid for by Meghan Kelly, Esquire
for 38th District*

I have been licensed to practice law for more than ten years in this state. I have reviewed proposed laws periodically starting in 2006 at Richards, Layton and Finger, and throughout the years since, and I have discovered a strong desire to draft and amend laws to better serve Delawareans.

So, I found myself filing to run for office in hopes I could improve the lives of people in the community I grew up in and love.

I am honored for the opportunity serve you.

PURPOSE

- * Amend and draft laws that better serve Delawareans.
- * Focus on serving people, and preventing abuse and corruption by those who seek to take advantage of Delawareans for profit or gain.
- * Work on solving problems while holding individuals and businesses receiving funds personally accountable for loss and self dealing
- * Uphold Delawareans' freedoms and fair application of the laws regardless of race, religion, gender, age, wealth or poverty. Every citizen is important and valuable to our community.

PLATFORM

- * **Seek improvement on infrastructure**
- * **Healthcare**
- * **Clean Water**
- * **Preserving the Environment**

I am a supporter of education at all ages. We are all learners and teachers. Every citizen at every age is valuable, and is worthy of opportunity. A student's worth does not diminish when schooling ends, and Delawareans do not necessarily need to go into debt in order to gain employment. Nevertheless, they do need to have a valuable skill. We should encourage people of all ages to invest in themselves throughout their lives, not merely when they are young.

I am open to discussions on how we can help our current available work force to thrive instead of merely survive. Too many talented, smart, hard working people are taking on multiple jobs to make ends meet. Others work three to five months during the summer season, in our resort town. Then they rely on unemployment and welfare to get by. With federal cuts, this may no longer be an option. Crime to survive is not an option either.

I do not have the answers in this area. Nevertheless, I am open to discussions. I will need your help to create better paying opportunities in Sussex County that will lift our neighbors out of poverty and prevent them from turning towards crime.

Thank you for supporting me in serving you.

Very truly,
Meg Kelly, Esquire
Licensed, DE, DC, PA, US Supreme Court
electmegkelly@icloud.com

EXHIBIT 2

Kelly files to run for 38th District representative seat



Coastal Point • Shaun M. Lambert

Meaghan Kelly has filed to run against Rep. Ron Gray in the 38th Representative District election. Kelly resides in Dagsboro.

By Maria Counts
Staff Reporter

Dagsboro resident Meaghan Kelly is hoping to make a difference in her community via the halls of the state legislature, having filed to run in the 38th Representative District election. Kelly filed in March for the seat, which is currently held by Ron Gray. "I have been interested in choosing

from the University of Delaware. She is well-rooted in the community, as her father taught for 20 years in the Indian River School District and lifeguarded in the summer months.

"I grew up here," she said.

She went on to receive her juris doctorate from Distinguished School of Law. While in law school, she interned with the Hon. Thomas Hardman at the U.S. District Court for the Western District of Pennsylvania, who now serves as a Third Court of Appeals justice.

"I definitely think my education will help me, because I have training in the area of law and I know how they work together, with federal, state and local laws. I might be able to propose solutions that other people would not be aware of... based on how the laws relate to one and other," she explained.

"In addition, I've had the pleasure of reviewing laws over the years in my bar sections with other attorneys, in groups such as the real estate section, bankruptcy, wills and trusts sections of the bar. So, we have a whole group of attorneys analyzing bills and then we're view entire titles or sections together related to the areas we practice in.

"I think that will assist me in helping to serve the community better, because I've had experience reviewing and making comments on different laws throughout the years.

"I want to uphold Delawareans' freedoms and fair application of the laws, regardless of race, religion, gender, age, wealth or poverty. Every citizen is important and valuable to our community." Kelly is also licensed to teach social studies, physical education, health, elementary education, special education and middle school math in Delaware.

"I am a supporter of education at all ages. We are all learners and teachers. Every citizen at every age is valuable and is worthy of opportunity. A student's worth does not diminish when

schooling ends, and Delawareans do not necessarily need to go into debt in order to gain employment.

"Nevertheless, they do need to have a valuable skill. We should encourage people of all ages to invest in themselves throughout their lives, not merely when they are young.

"I think the most important thing we can do is make sure the state legislature supports adequate funding so that the schools can operate," Kelly added. "In other states, there are a lot of problems, and I don't want to see those problems in Delaware, where they've been reducing the amount of money and teachers are being let go."

Infrastructure is also an area Kelly said she believes could be improved, especially in Sussex County.

"I think it's really important to make sure roads are fixed and that the State of Delaware works with local governments as well. We need to make sure our roads are safe and that people can get to the places they need to go to without much difficulty," she said, adding that she applauds the State for bike-path improvements done in recent years but believes more could be done.

She is also quite passionate about the environment and said she believes maintaining the state's natural resources is essential to its economy.

"The environment is important to us. Our beautiful beach towns rely on the three Rs — real estate, restaurant and retail. A lot of our local livelihood is based on that three to six months of the tourist season. If we don't have a clean beach that attracts business, we don't have much to offer the people in our community. Where are they going to work?"

Kelly said she is seeking to bypass the influences of big business and

See KELLY page 5

was reviewed for potential savings. Probert said she wants to "take a hard look at the numbers" regarding return-on-investment for IRSD's educational programs.

ing sure that we are providing a positive educational environment?"

Probert's three children attended district schools, although the oldest chose to continue at a charter school. The

clearly, since this is something I'm doing on with the school board — and building leadership skills, long-term life skills in kids, and the more hands-on, the better, so that's a big part of what

small-town, grassroots, local 4-H leader

See ELECTION page 6

Kelly

Continued from page 4

money during her campaign — and, if elected, in her service to the community and state.

"I want to focus on serving people, and preventing abuse and corruption by those who seek to take advantage of Delawareans for profit or gain. I want to work on solving problems while holding individuals and businesses receiving funds personally accountable for loss and self-dealing," she said.

"In the past, the State of Delaware has given businesses big chunks of money to come to Delaware. Those businesses took the money, but when the money dried up, they left. I want to create penalties if they should leave within 15 or so years, so they don't come here for money and then leave when it's no longer profitable. I want them to invest in the community."

While she will not be accepting monetary donations toward the campaign, to ensure there is no appearance of "buying a vote," Kelly said she would accept donated items related to the campaign, such as signs or shirts.

"My desire is to help people, to serve people — not profit. A lot of laws in Delaware are skewed to serving those with money and property, instead of serving the person. I value people more than money."

In campaigning, Kelly said she hopes to speak to groups in the area, but also get to know constituents on a one-on-one basis.

"I'm happy to attend functions if anyone would like to invite me, to learn how I can better serve you. I'm happy to speak about anything anyone is interested in learning about or to merely answer questions," she said.

Taking a page from the book of state Sen. Brian Townsend, who does walk-and-talks at the mall, Kelly said she would like to do the same — but at the beach.

On the third Saturday of every month, Kelly said she will do a walk-and-talk at the Bethany Beach boardwalk around 5 p.m.

"I would love the opportunity to see people. Regardless of party affiliation, everyone is welcome to attend," she said.

"I am open to discussions on how we can help our current work force to thrive, instead of merely survive. Too many talented, smart, hard-working people are taking on multiple jobs to

make ends meet."

Kelly said her campaign is focused on the people in the 38th District, and she hopes it will bring about open and positive discussions.

"Being in the position as state legislator may enable me to serve the community I grew up in and love," she said. "My focus is going to be on 'How can I serve you better?' I'm going to put peo-

ple before profit and money. I'm going to serve everybody. I value people."

She noted that while there hasn't been a Democrat representing the 38th District in a while, she hopes the voters will consider supporting her campaign.

"I think I would do an excellent job because I care," she said.

Kelly said she looks forward to the months ahead and thanks those in the

community for their support.

"I look forward to, hopefully, meeting more people out in the community, listening to their concerns and addressing them," she said. "I hope they give me a shot, because I would love to serve them."

Those who wish to contact Kelly regarding her campaign may do so by calling (302) 537-1089 or emailing electmegkelly@icloud.com.

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EXHIBIT 3

Receipt of Responses

Dear Meghan M Kelly,

Thank you for responding to our 2018 Voter Guide questionnaire. The League of Women Voters of Delaware appreciates your participation! Informed voters are the backbone of our democratic republic. .
For your records, here is a copy of your responses:

Education

Meghan Kelly, Esq. attended Lord Baltimore Elementary, Selbyville Middle, and Indian River High School where she participated in Girl's State, National Honor Society, Cheer leading, Drama Club, Band, Soccer, and Field hockey. Meghan received her Bachelor's Degree from the University of Delaware, and her JD from Duquesne School of Law. While in law school, she interned with the Honorable Justice Thomas Hardiman, nominee for US Supreme Court, and current Third Court of Appeals Justice.

Work Experience

I reviewed proposed changes of laws for over a decade, starting in 2006 at the law firm, Richards, Layton & Finger, and discovered a desire to amend laws to better serve the people in the community I grew up in and love. I desire to draft laws that actually work, that are enforceable, that make a difference. I will combat corruption, abuse and misuse of funds and resources to protect those I hope to serve, the people, not our own backs. I gained expertise working for several firms in Delaware. I have experience representing clients in hearings and meditations, as well as in corporate law, bankruptcy, personal injury, wills and estates, real estate transactions, and general litigation. I am also licensed to teach, and worked for the Indian River School and Cape Henlopen School Districts. I have worked throughout the Delaware beaches in my youth, from age 14 on, and I am delighted for the opportunity to serve the people in the community I grew up in and love as a legislator. Thank you.

Community Involvement

With regards to community involvement during the election, I received permission from Bethany to informally meet with people at the Bethany Beach Board walk, every 3rd Sat. at 5:00 PM to "walk and talk" with people. I also intend to keep knocking on doors in hopes to hear what is important to folks in the community. I look forward to hopefully seeing you at the walk and talks and other free events in the community. Nevertheless, I am cognizant that it is impossible to talk with each voter before the election. So, I have also drafted Guest Columns in the Coastal Point, a local newspaper. The Editor kindly prints my columns from time to time. I welcome comments both negative and positive as I prefer to know where I fall short so I may improve. One reason why I choose not to fund raise, though I am not wealthy like my millionaire opponent who started off with over \$29K in donations, is because I want you to know your vote cannot be bought. You cannot be bought. People are priceless.

Email Address

electmegkelly@icloud.com

Website

Phone

(302) 537-1089

Address

34012 Shawnee Drive

Age

Additional Information

With regards to campaign finance, I choose to be part of the solution, not part of the problem. I am not going to accept monetary donations during my campaign to prevent the appearance of undue influence or favoritism, except by the Democrat party. (They cannot buy me. I am already theirs. I am a lifelong Democrat.) Nor am I going to give monetary donations, or attend events that require fees as that may make the appearance of buying votes. So, I intend to attend free events that will not cost attendees or me any money. My platform includes: 1. Infrastructure, 2. the Environment, 3. Clean Water, and 4. Healthcare, but I intend to do so much more to help people. I will uphold Delawareans' freedom and fair application of the laws regardless of race, religion, age, wealth or poverty. Every citizen is important and valuable to our community. I will focus on serving people, and preventing abuse and corruption by those who seek to take advantage of Delawareans for profit or gain.

Facebook Page

Twitter Page

What issue do you feel has the greatest impact on Delaware's economy today? Please describe why it is important and what needs to be done.

The negative consequences of deregulation and the defunding of the federal government that will impact Delawareans down the road is the greatest issue legislators must address, and not hide from. We need to prepare for what is ahead, a short fall of expected federal funds, which will lead to a short fall of state and local funds. Deregulation sounds great until you realize you must increase local taxes to pay for things or go without. The Federal government gives money to Delaware, in part, under its authority under Article I Section 8 of the Constitution, the Spending Clause. Delaware receives money with strings attached, called regulations. If Delaware doesn't adhere to the regulations, we do not receive money. As the federal government deregulates, it will continue to defund programs in Delaware. That means state and local governments must pay for more or go without. We must also prepare for the removal of environmental laws by the Federal Government to prevent harm.

Please describe what, if anything, Delaware should do to reduce gun violence in the state.

We need to address and prevent the underlying conditions that lead to gun violence: poverty, bias, prejudice, fear, greed, violence, and desperation, with correction not condemnation. When you condemn people as opposed to the bad choice, you instill fear, creating an incentive for folks to hide their evil instead of bringing it to light to be corrected. We live in unstable times. Many of my neighbors fear the overthrow of the foundation of the government, the Constitution. As I have knocked on doors, many discussed the potential repeal of the second amendment as the first step towards the repeal of the entire Constitution. I am not for repeal, just limits. All constitutional rights have limits in order to uphold the rights of others. We can place limits on the sale and distribution of guns to ensure guns do not get in the hands of those who wish to kill, steal and destroy.

How would you work to address the state's long-term budget challenges? What specific changes in revenue sources or spending do you support? Please explain.

I support state spending for beach replenishment, roads, and schools. I would like to avoid an increase in local taxes to prevent foreclosures. We must perform due diligence before granting funds to businesses to avoid bad investments. Stop focusing on businesses that keep folks in poverty and on welfare, and start focusing on businesses that take care of employees, not take advantage of them. Should any money be granted to a business, require they pay every dime back should they pull out of Delaware. Otherwise, they will take free money and leave when the money stops. I am open to discussions on how we can help our current available work force to thrive instead of merely survive. Too many talented, smart, hard working people are taking on multiple jobs to make ends meet. Others work 3 to 5 months during the summer season in our resort town. Then they rely on unemployment and welfare. With federal cuts, this may no longer be an option. Crime to survive is not an option either.

What actions, if any, should the state legislature take to improve water quality in Delaware? Would you support additional funding for clean water projects through a surcharge on state income tax?: No Position

If no, what other funding mechanisms would you suggest?

Throwing money at problems does not solve them. It creates an incentive not to solve them, the desire for more money, greed. That said, I am not opposed to creating additional tax brackets. I intend to draft and amend laws to make the wrong doer, not the tax payer, clean up the pollution. Make it easier for an attorney to correct bad behavior by removing certain obstacles within the statutes, eliminate defenses, expand standing to additional plaintiffs, require monetary and specific performance, talk to the environmental section of the bar and work to create a legislative solution to alleviate this problem. My opponent Representative Ronald Gray co-sponsored House Bill 190, legislation that removes the ban on the construction of new heavy industry in coastal areas. We need to draft laws to make polluting entities clean up their current messes before we may unknowingly create additional threats to human life and health by encouraging the construction of additional plants.

Do you support state funding for a new voting system? (Y/N) If so, what criteria should be used to select the system?
I have not made a determination on this issue. I prefer the paper ballots since there is less security risk.

Manufactured housing policy is currently regulated by multiple agencies including the Department of Motor Vehicles, Attorney General's Office, Delaware Manufactured Homeowners Relocation Authority, and the state legislature. Would you support a dedicated Office of Manufactured Housing?: No Position

Please explain:

it depends on whether safeguards remain to protect the mobile home owners. We should protect the Delawareans we serve more than profit. People are more valuable than money. We are number two in foreclosures in the country. It is of utmost importance that we do not push folks out of their homes merely to make more money. On a side note, I have been concerned about my opponent, Mr. Ronald Gray's sale (as part owner) of Shady Park, a trailer park including over 300 families for millions of dollars when he is already wealthy. Conveniently, there is no danger of this property being converted to a factory or condos (increasing congestion) before the election, as the process takes about a year and is quite time consuming. Nevertheless, did his participation in the decision potentially jeopardize many families' homes in the future, 5 to 10 years from now? I hope not. Nevertheless, I writing about this early in an attempt to discourage redevelopment Shady Park. Serve people, not greed.

Do you favor legalizing marijuana for non-medical personal use in Delaware?: No Position

Please explain:

I have made no determination on this issue. I have never tried marijuana, and never plan to. This is not a priority for me at this time. I see the benefits of legalization to free up the police. This offense is less serious towards the public than violence or more dangerous drugs offenses. If legalized, mandatory expungement of past criminal records is required, unless it relates to vehicular offenses. On the other hand, I am concerned about the government using people for money regardless of potential harm, and I am concerned about modeling bad leadership. When drugs are lawful, people may think they are encouraged. I do not want to encourage folks to give into the temptation of smoking pot all the time. We all know so called "pot heads" who have not been able to get ahead. I do not want to encourage folks to harm themselves, and get stuck. Nevertheless, I do not think this drug is as harmful as many alleged medicines. Why are law makers less concerned about harmful prescriptions?

Please contact vote411LWVDE@gmail.com or (302) 650-6897 for questions.

Sincerely,

Kim Wells
2018 Delaware VOTE411 Coordinator

This message was sent to electmegkelly@icloud.com from [Voter Guide Toolkit](#) on behalf of lwwde12 Voter Guide. If you would not like to receive any further messages from Voter Guide Toolkit, [click here](#). To ensure that you receive important messages from Voter Guide Toolkit, please add messages-c2@thevoterguide.org to your address book.

EXHIBIT 4

On Tue, Oct 23, 2018 at 8:02 PM Meghan Kelly <electmegkelly@icloud.com> wrote:
Hi Danielle,

Thank you for posting it so quickly. I saw some more typos and revised it yet again.

I'm sorry.

Thank you for helping me. Have a great night.

Very truly,
Meg

Second ballotopedia

What would be your top three priorities, if elected?

1. Preserving the Environment:

I intend to draft and amend laws to make the wrong doer, not the tax payer, clean up the pollution. Make it easier for an attorney to correct bad behavior by removing certain obstacles within the statutes, eliminate defenses, expand standing to additional plaintiffs, require monetary and specific performance, talk to the environmental section of the bar and work to create a legislative solution to alleviate this problem.

My opponent Representative Ronald Gray co-sponsored amendments to House Bill 190, legislation that removes the ban on the construction of new heavy industry in coastal areas. We must draft laws to make polluting entities clean up their current messes before we may unknowingly create additional threats to human life and health by encouraging the construction of additional plants.

2. Seek Improvements on Infrastructure:

I intend to seek a greater amount of money from the state of Delaware to improve our roads, schools and to maintain our beaches from the state in hopes not to increase local taxes. Many of my neighbors are land rich, but wage poor. They simply cannot afford an increase in local taxes as that may push them out of their homes.

Delaware is number two in the country for foreclosures. I choose to alleviate the foreclosure crisis, not exacerbate it.

I also intend to seek ways to slow down the building boom to decrease the congestion problem. Our infrastructure cannot sustain the current population. We must improve, maintain and preserve our infrastructure before building it up more. We need to create an atmosphere of success not failure.

3. Improve Health Care:

Please refer to the article I drafted in the Coastal Point, called Representative candidate says health is wealth, dated July 20, 2018, which outlines my proposals to improve the quality of health care. I studied the history of health care at University of Delaware, and health care law and health care finance at law school. So, I also proposed laws to federal legislators that would reduce the cost of health care without eliminating the quality or quantity of care. .

What areas of public policy are you personally passionate about?

With regards to campaign finance, I choose to be part of the solution, not part of the problem. I am not going to accept monetary donations during my campaign to prevent the appearance of undue influence or favoritism, except by the Democrat party. (They cannot buy me. I am already theirs. I am a lifelong Democrat.) Nor am I going to give monetary donations, or attend events that require fees as that may create the appearance of buying votes. So, I intend to attend free events that will not cost attendees or me any money. My platform includes: 1. Infrastructure, 2. the Environment, 3. Clean Water, and 4. Healthcare, but I intend to do so much more to help people. I will uphold Delawareans' freedom and fair application of the laws regardless of race, religion, age, wealth or poverty. Every citizen is important and valuable to our community.

My Goal is to:

- * Amend and draft laws that better serve Delawareans
- * Focus on serving people, and preventing abuse and corruption by those who seek to take advantage of Delawareans for profit or gain
- * Work on solving problems while holding individuals and businesses receiving funds personally accountable for loss and self dealing
- * Uphold Delawareans' freedom and fair application of laws regardless of race, religion, gender, wealth or poverty. Every citizen is important and valuable to our community.

I am a supporter of education at all ages. We are all learners and teachers. Every citizen at every age is valuable, and is worthy of opportunity. A student's worth does not diminish when schooling ends, and Delawareans do not necessarily need to go into debt in order to gain employment. Nevertheless, they do need to have a valuable skill. We should encourage people of all ages to invest in themselves throughout their lives, not merely when they are young.

I am open to discussions on how we can help our current available work force to thrive instead of merely survive. Too many talented, smart, hard working people are taking on multiple jobs to make ends meet. Others work three to five months during the summer season, in our resort town. Then they rely on unemployment and welfare to get by. With federal cuts, this may no longer be an option. Crime to survive is not an option either.

I do not have the answers in this area. Nevertheless, I am open to discussions. I will need your help to create better paying opportunities in Sussex County that will lift our neighbors out of poverty and prevent them from turning towards crime.

Who do you look up to? Whose example would you like to follow and why?

My father, the legendary Coach, Pat Kelly is my hero. He was a beloved basketball coach and Civics and United States History teacher at Indian River High School for about 20 years. My dad is and continues to be a positive role model for not only students and his family, but to the world too. He lifted black students up through basketball at my former high school, a football school where prejudice sadly remains. My father used to stay late and tutor students after school. He used his own money to buy them shoes. My mom visited their loved ones at prisons. My dad looked for scholarships and helped seek opportunities for students to lift them out of poverty. My dad loved those kids, and continues to stay in touch with many, decades later. He is always available to offer encouragement and hope. Unfortunately, my father left ten years ago to teach and coach high school basketball in Florida. So, his impact has weakened in Sussex County, Delaware.

In 2016, students at Indian River High School gave black students bracelets with the Nazi symbol that allegedly said "kill yourself" in response to the Black lives matter bracelets. That was awful.

My father is my hero because he chooses to do what is right even if he is the only one who has the courage to do so. I choose to do the same by standing up when others remain down out of fear, for speaking up when others choose not to be inconvenienced, for choosing to do what is right even if it costs me everything.

My dad lives the life he desires others to emulate by respecting and honoring all people regardless of their wealth or poverty, race, diverse religion, place of origin, age or unique beliefs. He truly lives a life of love and encouragement. I hope to do half the good he has done. My father, Pat Kelly, also life guarded at the Delaware beaches, and taught Sunday School at Saint Anne's Located at Bethany Beach.

He also has the best dance moves in our family. He made living a life of love look cool and is the hero of many beyond his own. Thank you Dad. I love you.

Is there a book, essay, film, or something else that best describes your political philosophy?

The Bible. I try to live by it by:

-Serving people, not taking advantage of them for gain. "The greatest among you is your servant." Matthew 23:11. Not servant of those who serve you thereby serving yourself.

- having faith instead of fear,

.-loving instead of remaining indifferent or hating,

-instilling hope instead of bitterness, or despair,

- using the laws of the courts to correct people, not to condemn them,

-instilling mercy and teaching opportunities, not condemnation,

-building up not tearing down,

- serving people, not serving greed,
- loving people, not loving power, not loving money,
- love not evil. I define evil as absence of love for those beyond your own,
- seeking solutions to alleviate challenges instead of seeking someone or something to blame,
- building up, not to tearing down,
- remaining humble and grateful instead of glorifying self or mere man,
- Lead in truth, not in deception. Be a leader not a misleader,
- remaining impartial and fair. Do not serve merely those who serve you. That is wrong.

What Characteristics or principles are most important for an elected official?

"The greatest among you is your servant." 23:11. I hope to model good leadership by serving people, not serving greed. I hope to teach people they are priceless, not a price tag. People are more valuable than money. I hope to teach people to encourage one another by building each other up instead of shaming each other and tearing each other down. I hope to teach people to respect others while respectfully disagreeing. I hope to teach people to attack problems, not create more problems by attacking people. I hope to serve people well.

What qualities do you possess that would make you a successful officeholder.

I have been licensed to practice law for more than ten years in this state. I have reviewed proposed laws periodically starting in 2006 at Richards, Layton and Finger, and throughout the years since, and I have discovered a strong desire to draft and amend laws to better serve Delawareans.

So, I found myself filing to run for office in hopes I could improve the lives of people in the community I grew up in and love.

I desire to draft laws that actually work, that are enforceable, and that make a difference. I will combat corruption, abuse and misuse of funds and resources to protect those I hope to serve, the people, not our own backs. I gained expertise working for several firms in Delaware. I have experience representing clients in hearings and mediations, as well as in corporate law, bankruptcy, personal injury, wills and estates, real estate transactions, and general litigation. I am also licensed to teach, and worked for the Indian River School and Cape Henlopen School Districts. I have worked throughout the Delaware beaches in my youth, from age 14 on, and I am delighted for the opportunity to serve the people in the community I grew up in and love as a legislator.

What do you believe are the core responsibilities for someone elected to this office?

* Amend and draft laws that better serve Delawareans.

* Focus on serving people, and preventing abuse and corruption by those who seek to take advantage of Delawareans for profit or gain.

* Work on solving problems while holding individuals and businesses receiving funds personally accountable for loss and self dealing

* Uphold Delawareans' freedoms and fair application of the laws regardless of race, religion, gender, age, wealth or poverty. Every citizen is important and valuable to our community.

* Listening and looking into the needs of those I hope to serve. Preparing them for challenges ahead without giving empty promises.

What legacy would you like to leave?

I hope to draft laws that will improve the lives of those I hope to serve well beyond my life time.

I also hope to teach people the following:

- What makes America great is the people. Without the people this country is just a bunch of land. What makes America great is Americans' universal respect for the freedoms of speech, assembly, religion or place of origin.
- Serve people, Not Greed.
- People are Priceless, Not a Price Tag.
- Invest in yourself. You are worth it. People are priceless.
- No one is above the law. No one is below the law.
- Violence is the problem, not the solution.
- Use Words Not weapons. Words become Ideas. Ideas become beliefs. People cling more tightly to beliefs than money. Words are powerful.

- Greed is the evil seed that blooms into hate.

Businessmen give business to those who give business to them. Their kids take over their businesses and send business to each other. So, the tradition continues.

When alleged outsiders, (from desegregation, the women's right movement, and immigrants), started to compete for the same business, businessmen began to fear losing money.

So they misbehaved by name calling, bias, prejudice, black balling and worse. Be courageous, respect, not cowardly by hate.

- Do not make jokes based on race, religion, gender or nationality. When they go beyond a joke, it is no laughing matter.
- There is no Delaware way. There is an American way where we respect all people regardless of race, religion or place of origin (even Pennsylvania).
- Women are Someone to respect. They are not Something to look at, use, or do. Women are people not things.
- Do not laugh at jokes that sexualize women. They are not funny. When they go beyond a joke, it is no laughing matter.
- Confront to correct, not to condemn, or let it slide off your back whichever is more loving.
- Attack problems, not people. Attacking problems solve them. Attacking people creates more problems.
- Courts are for correction, not condemnation.
- Pride is ugly. Putting others down, while saying you are better than is ugly. Respect, now that is beautiful. Building others up, without tearing others apart. Praising someone, without putting others down.
- Serve People not Money. Serve People, not People's desire for security in money (otherwise known as Greed). Love People, not Money.

What is the first historical event that happened in your lifetime that you remember? How old were you at that time?

With regards to the first historical event in my history, in Middle School, I ran for office and won. I remember Jennifer Hickman was my campaign manager. She played Bon Jovi's song about signs as I walked down to speak. Later, in 10th grade, I was nominated to Girl's State where I was elected to be the Speaker of the House during a mock legislative race. I remember in my speech I chose not to bore people on all the credentials and activities I participated in. Instead, I said I would serve them well by speaking well, and I won.

I have a fire in my belly to act and participate in drafting laws, not merely comment on the side. This is part of the history that led me to file to run for the House of Representatives in the 38th District.

What was your very first job? How long did you have it?

I think I baby sat before I was 14. When I was 14, I worked at a grocery store in Bethany Beach. I don't remember the time frame or how long I worked.

What happened on your most awkward date?

When I was young, I played on the boys' soccer team at Indian River High School, with the Democratic candidate for Treasurer for the State of Delaware, Colleen Davies.

At the end of the season Coach Dunkin Smith gave me toothpaste and a tooth brush as a gag gift since it looked like a smile when I accidentally hurt boys on the soccer field.

Kris McClure, the cutest guy in high school, received a heart because he had me for a girl friend for a limited time.

Kris was so sweet. He invited me to the movies at Clayton on a Sunday night, but I was so late. I fear an hour late because I went to church and Sunday school. It was CCD Sunday school night after all. He patiently waited for me outside of the movie theatre the entire time.

That was the worst date ever, but it was my fault. I am sorry Kris.

It is a good thing we broke up because his political values, his heart is different than mine. I serve people, not greed, not my own sinful desires. He appears to be on the other side of the political aisle, 20 years later.

Regardless, thank you for being a gentleman when we were children. You showed me honor and respect on all other dates too. I pray your heart turns away from the misleadership of President Trump. You know my heart. I have not changed. I am like my father. I like who I am, who I choose to be. I am not ashamed because I try not to give into temptation by serving sins. I don't want to mislead people into thinking evil is good.

What is your favorite holiday? Why?

Christmas, because I love to focus on God's love, mercy and salvation extended to the gentiles like me, through the birth of Jesus Christ.

What is your favorite book? Why?

The Bible. I live by the Word of God.

If you could choose to be any fictional character, who would you be?

No one. I choose to be me.

What is your favorite thing in your home or apartment? Why?

The Bible. I place my faith in the Word of God.

What was the last song that got stuck in your head?

Wildest Dream by Taylor Swift. I was so impressed with her courage to speak out on important issues in political campaigns, though others disagreed. I applaud her for living in faith with tolerance and respect for those beyond her own. It takes great courage to love. Plus, I like dancing to her album 1989. Her new album is a little too dark for me, but Taylor is a bright light in a dark world shedding light on darkness to drive it out into the light.

What is something that has been a struggle in your life?

I made my love for a man an idol and placed my life on hold hoping to marry him. His dream was to be a math teacher. So, I lived my life trying to help him achieve his dream by periodically working in

the schools, gaining additional teaching licenses. I have six teaching licenses: Social Studies, Middle School Math, Physical Education, Health, Elementary Education and Special Education. My attempts did not strengthen our love. It just caused resentment. I learned you can't live for one person, or make one thing here in this world your everything. We are called to live for God foremost. So, God removed him from my life. So, I would have stronger faith in God through Jesus.

Do you believe that it's beneficial for state legislators to have previous experience in government or politics?

It depends.

Prior experience can lead to corruption when officials merely serve those who serve them instead of performing their job by serving the people. The focus must be serving the people, not merely those who serve us. We must work together and communicate, even when we respectfully disagree, but we should not use relationships to better our positions instead of those we are seeking to serve, the Delawareans.

What do you perceive to be your state's greatest challenges over the next decade?

The negative consequences of deregulation and the defunding of the federal government that will impact Delawareans down the road is the greatest issue legislators must address, and not hide from. We need to prepare for what is ahead, a short fall of expected federal funds, which will lead to a short fall of state and local funds. Deregulation sounds great until you realize you must increase local taxes to pay for things or go without. The Federal government gives money to Delaware, in part, under its authority under Article I Section 8 of the Constitution, the Spending Clause. Delaware receives money with strings attached, called regulations. If Delaware doesn't adhere to the regulations, we do not receive money. As the federal government deregulates, it will continue to defund programs in Delaware. That means state and local governments must pay for more or go without. We must also prepare for the removal of environmental laws by the Federal Government to prevent harm by creating policies and local laws to protect, preserve and maintain our beautiful beach environment.

What do you believe is the ideal relationship between the governor and the state legislator?

They function as checks and balances upon each other to work together to serve the American people.

Do you believe it's beneficial to build relationships with other legislator's? Please explain your answer.

It depends. If the focus is on serving the people it is positive. If the focus is on serving yourself or merely those who serve you, that leads to corruption. The relationship must be professional for the purpose of serving the people, not personal with the purpose of serving each other's own backs, to be beneficial.

What process do you favor for redistricting?

No determination has been made at this time.

If you are not a current legislator, are there certain committees that you would want to be part of?

No determination has been made at this time.

If you are not currently a member of your party's leadership in the legislature, would you be interested in joining the leadership. If so, in what role?

No determination has been made at this time.

Is there a particular legislator, past or present, whom you want to model yourself after?

President Obama. He reminds me of my father, Pat Kelly, in that he is brilliant, disciplined, respectful and a graceful speaker.

Although, I did not agree with all of his choices, I respect him for having the courage to choose to support what he believed would protect and improve the lives of others. Thank you President Obama for being our greatest President. I am saddened by the great backlash of our nation after we elected our first black president.

We had our first black president in 2008. In 2016, our country gave the popular vote to our first woman to win such. Sadly, the electoral college chose an unqualified man over a woman due to their prejudice.

In 1870, black men gained the right to vote with the passage of the 15th Amendment. It was not until 50 years later, in 1920, that women gained the right to vote with the passage of the 19th Amendment. Must we wait 50 more years before men recognize woman as people, as leaders, and not as something to look at, use or do. Women are people not things.

It is not a man's world. It is our world, both men and women's world to share. We respect and honor both men and women, not just men.

Thank you President Obama for your platform of hope and life that reflects that hope. President Obama you reminded us prejudice is wrong. You give us courage and hope. Thank you.

Are you interested in running for a different political office in the future?

I am interested in running for federal congress. I have proposed ideas relating to federal laws, including but not limited to: saving the post office, to ensure additional funding on social security, so we can take care of our elderly instead of take advantage of them, to prevent oil drilling, and with regards to drafting laws to reduce the price of healthcare without reducing the quality or the amount of care. So far, the federal legislators have not addressed my suggestions.

I will try to improve the laws in Delaware first. Maybe this position will give me a greater voice to share my ideas to federal legislators. So, maybe I will not be required to run. Nevertheless, I am not leaving it out. If no one will step up to help when they are able, and I am afforded the opportunity and the financial ability to do so, I will.

Both sitting legislators and candidates for office hear many stories from the residents of their district. Is there a story that you heard that you found particularly touching, memorable or impactful?

I am saddened by people I grew up with condemning blacks and the poor. The same people condemn people who do not give to charities, which is hypocritical. As a Christian, I believe we should give in secret pursuant to Matthew 6 instead of to be seen, for tax breaks and cheap marketing. Instead of giving money for something in return, we should do it out of love or it is not charity. Love is not self serving, pursuant to 1 Corinthians 13:4-7.

I am saddened by people condemning, blaming and shaming the down trodden instead of lifting them up. The story in my community is the story I see by those I love and grew up with that choose to fear and hate, instead of respect or love. I choose to teach them hate is wrong.

EXHIBIT 5

Sent from my iPhone

Begin forwarded message:

From: "Balke Jeannie (Courts)" <Jeannie.Balke@state.de.us>
Date: February 22, 2012 at 11:59:29 AM EST
To: Meg Kelly <meghankellyesq@yahoo.com>
Subject: RE: Sponsor for the United States Supreme Court

I called to check on the spelling of your name on the wall of the Supreme Court -- I was told it has been corrected. Have a nice day!

-----Original Message-----

From: Meg Kelly [mailto:meghankellyesq@yahoo.com]
Sent: Tuesday, February 21, 2012 3:10 PM
To: Balke Jeannie (Courts)
Subject: RE: Sponsor for the United States Supreme Court

Dear Ms. Balke,

Thank you so much for checking with Justice Ridgely. Additionally, thank you for your suggestions.

I appreciate your time and help.

On a separate matter, I had the pleasure of being admitted to the DE bar by the Honorable Henry DuPont Ridgely. Unfortunately, I was concerned that my request to be admitted by affirmation as opposed to being sworn in was not honored. I made a special request with Ms. Holland, and yet it was not honored.

I know it sounds silly but I am a Christian and I actually believe in the bible. So, I've felt guilty years later because the bible provides, "Above all, my brothers, do not swear-- not by heaven or by earth or by anything else. Let your 'Yes' be yes, and your 'No' be no, or you will be condemned." NIV James 5:12.

The bible further provides, "Do not swear at all: either by heaven, for it is God's throne; or by the earth, for it is his footstool: or by Jerusalem ... Simply let your 'Yes' be 'Yes,' and your 'No,' be 'No' anything beyond that comes from the evil one." NIV Matthew 5:34-37.

To make matters worse, my name was misspelled on the wall of the Supreme Court. I know there's nothing I can do about how I became licensed in DE, but I was hoping I could somehow fix my name on the wall of the Supreme Court.

I have a family full of successful attorneys, and I am but a peon, still starting out. I can't believe I am related to the Mark Braden who coined the term "soft money." And my cousin Ikey Adams works where the President met his wife, Sidley Austin, and my deceased Grandpop has a plaque at Pittsburgh Courthouse as the infamous public defender "Battle Ship Bob." Nonetheless, I am proud to be the first female attorney in my family, and it would mean the world to be to correct the spelling of my name. So, I could someday show my future children and grandchildren that they can do anything if they stay determined. I brought it up with Ms. Holland a couple of times, but to the best

of my knowledge it has not been corrected.

Thanks again for asking Justice Ridgely for help. I appreciate your kindness.

Very truly,
Meg Kelly, Esq.

ps. It's silly that we swear on the bible, when the bible instructs us not to swear. Could you ask the judges whether they would consider swearing in witnesses and admittees by using the term "do you swear or affirm." That way it may prevent heartbreak and regret. Thank you.

--- On Mon, 2/20/12, Balke Jeannie (Courts) <Jeannie.Balke@state.de.us> wrote:

From: Balke Jeannie (Courts) <Jeannie.Balke@state.de.us>
Subject: RE: Sponsor for the United States Supreme Court
To: "Meg Kelly" <meghankellyesq@yahoo.com>
Date: Monday, February 20, 2012, 2:43 PM Hello Meg - I wanted to get back to you to let you know that Justice Ridgely will only sponsor those attorneys that he knows personally -- usually through clerkships. Perhaps you could contact the U.S. Supreme Court Clerk's office to get of list of those that may be able to sponsor you. Best of luck to you!

-----Original Message-----

From: Meg Kelly [<mailto:meghankellyesq@yahoo.com>]

Sent: Wednesday, February 15, 2012 1:17 PM
To: Balke Jeannie (Courts)
Subject: Sponsor for the United States Supreme Court

Dear Honorable Henry DuPont Ridgely,

I am seeking to be admitted before the United States Supreme Court,

and I am hoping you will be willing to be one of my sponsors.

Would you please consider sponsoring my admission before the United States Supreme Court?

Thank you so much for your time and consideration.

Very truly,

Meg Kelly, Esq.

34012 Shawnee Drive

Dagsboro, DE 19939

meghankellyesq@yahoo.com

302-537-1089

Licensed DE, DC & PA

DE Bar # 4968

EXHIBIT 6

MEGHAN MARIE KELLY, ESQUIRE
34012 Shawnee Drive
Dagsboro, DE 19939
(302) 537-1089

The Honorable Peter B. Jones
Family Court of the State of Delaware
The Family Court
22 The Circle
Georgetown, DE 19947

December 10, 2009

Dear Honorable Peter B. Jones:

Thank you for taking time to meet with on December 9, 2009. Per your kind suggestion, I respectfully request that the Family Court of the State of Delaware in and for Sussex County remove my name from the rotating list of attorneys who are required to represent clients in family law proceedings due to religious reasons.

The practice of family law is against my religious beliefs. I am a Christian, and I find guidance in the Bible. The Bible provides: “[W]hat God has joined together, let man not separate.” *Citing*, NIV Mark, 10:9, and *Citing*, NIV., Matthew 19:6; *also see*, NIV., Malachi 2:16 (“I hate divorce”); NIV Genesis 2:20 (“man will ... be united to his wife, and they shall become one flesh); and, 1 Corinthians 7:10-11, (“A wife must not separate from her husband.” ... “And a husband must not separate from his wife.”).

In November, to my horror, I was appointed to a guardianship proceeding. I believe such a proceeding contributes to separating “what God has joined together,” because instead of the child bringing the parents together, the guardianship proceeding usually separates a child from one of the parents, and reinforces any division between a couple.” *Id.* Accordingly, it contributes to the break of a union that God has made.

Since, I didn't want to contribute to the destruction of a union created by God, I attempted to find another attorney who could replace my appointment with no success. As a result, I contacted this Honorable Court and communicated my views and this Honorable Court kindly relieved me of the appointment.

I respectfully request that I be relieved of all appointments relating to family law proceedings. Thank you for your time and consideration.

Very truly,

Meghan Kelly, Esquire

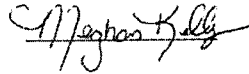
A handwritten signature in cursive script that reads "Meghan Kelly". The signature is written in black ink and is positioned below the typed name "Meghan Kelly, Esquire".

EXHIBIT 7

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939
(302) 537-1089

The Honorable Chandlee Johnson Kuhn
Family Court of the State of Delaware
New Castle courthouse
500 N. King Street, Suite 9445
Wilmington, DE 19801

October 10, 2012

Dear Honorable Chandlee Johnson Kuhn:

Thank you for excusing me from a recent appointment in October 4, 2012. I respectfully request that I also be removed from all future appointments relating to family law due to religious reasons.

The practice of family law is against my religious beliefs. I am a Christian, and I find guidance in the Bible. The Bible provides: “[W]hat God has joined together, let man not separate.” *Citing*, NIV Mark, 10:9, and *Citing*, NIV., Matthew 19:6; *also see*, NIV., Malachi 2:16 (“I hate divorce”); NIV Genesis 2:20 (“man will ... be united to his wife, and they shall become one flesh); and, 1 Corinthians 7:10-11, (A wife must separate from her husband.” “And a husband must not separate from his wife.”).

I believe that any proceeding contributing to the separation of “what God has joined together,” the destruction of marriage, is against my personal Christian beliefs. In addition to divorce proceedings, participating in guardianships and termination of parental rights proceedings also conflict with my religious beliefs because instead of the child bringing two parents together, such proceedings usually separates a child from one or both of the parents, and reinforced any division between the couple. *Id.* Accordingly, it contributes to the break of a union that God has made.

Since, I do not wish to contribute to the destruction of a union created by God, I respectfully, request that I be relieved of all appointments relating to family law proceedings. Thank you for your time and consideration.

Very truly,

/s/Meghan M. Kelly
Meghan Kelly, Esquire
DE Bar Number 4968
34012 Shawnee Drive
Dagsboro, DE 19939

EXHIBIT 8

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939
(302) 537-1089

The Honorable Henry DuPont Ridgely
Supreme Court of Delaware
502 South State Street
Dover, DE 19901

RE: INFORMAL COMMENTS ON CLE

October 1, 2012

Dear Justice Ridgely:

Thank you for participating in the CLE. I enjoyed it immensely. However, I had some concerns.

I was concerned by the appearance of some of the speakers' partiality towards Delaware attorneys. Every attorney that comes before a Delaware Court should be treated the same regardless of where they are from. The Court should not take a Delaware attorneys word over an out of state attorneys word solely on the illogical basis that the Delaware attorney is from Delaware.

I was also concerned about the comment that a judge let an out of state attorney practice pro hac vice because they were from a "respectable firm." I think all attorneys should be held by the same standard regardless of the size or reputation of the firm. They should be looked at as individual attorneys who will potentially have influence within the courts in this state.

On the other hand, I was very impressed by your graceful demeanor. You did not show partiality, nor did you support the above referenced remarks. Instead you sat back silently like a wisdom filled father observing all behavior. Thank you for being a good model for judges and attorneys.

Unfortunately, I have seen partiality towards Delaware attorneys in my practice. In fact during my first appearance in this state a judge accused me of being a "Philadelphia lawyer," as if this was a bad word.

I also worked with Delaware lawyers who grew up in other states, and I was surprised that some lawyers treated me differently because I grew up here. They would treat me with respect, lend me forms offer to meet me for lunch etc...Conversely, I recall how some Delaware attorneys mistreated my former non-native colleague by condescendingly describing "how things are done in Delaware" and "the Delaware way." I recall with disappointment that some Delaware lawyers even used bad language to discuss the Delaware way. I think such language and partiality makes Delaware attorneys look bad. Although it's nice to be given preferential treatment because of where I grew up it does not make it right.

On a personal note, one of the reasons why I became a lawyer was my faith, Christianity. Under my faith, Jesus Christ was executed for no lawful purpose. Instead he died as a result of the passion of the people instead of logic and reason under the law. That is wrong. The judicial system should remain impartial, and individuals should not face such irrational persecution. Nonetheless, this is not the case in our world. That is why I went to law school. And that is why I think it's important to bring my concerns relating to partiality before this Honorable Court to you.

You are the law and all attorneys including myself will strive to adhere to this Honorable Courts wishes. Further, you are the law for all of the lower courts as well. Accordingly, all judges will also strive to adhere to your wishes. Will you please consider discussing the importance of being impartial to your peers?

Thank you for being a good role model and for making a positive impact on Delaware attorneys and Delaware Courts, and thank you for considering my comments.

Have a good week.

Very truly,

/s/Meg Kelly
Meghan M. Kelly
34012 Shawnee Drive
Dagsboro, DE 19939
(302) 537-1089
DE #4968

EXHIBIT 9

Sent from my iPhone

Begin forwarded message:

From: Meg Kelly <meghankellyesq@yahoo.com>
Date: March 31, 2017 at 10:21:23 PM EDT
To: Meg Kelly <meghankellyesq@yahoo.com>, Matty R Kosiorek <matthewkosiorek@comcast.net>
Subject: Fwd: DEFEATING ISIS/ISIL

Sent from my iPhone

Begin forwarded message:

From: Meghan Kelly <meghankellyesq@yahoo.com>
Date: September 3, 2015 at 10:07:42 AM EDT
To: "Wescott, Jymayce (Carper)" <Jymayce_Wescott@carper.senate.gov>
Subject: Re: DEFEATING ISIS/ISIL

Thank you! You are wonderful!

Very truly,
Meg

Sent from my iPod

On Sep 3, 2015, at 9:58 AM, "Wescott, Jymayce (Carper)" <Jymayce_Wescott@carper.senate.gov> wrote:

Busy morning – Thanks: I will pass on to our DC office.

JWescott

Jymayce Y Wescott
Constituent Services Director
Office of US Senator Thomas R. Carper
12 The Circle
Georgetown DE 19947
302 856-7690
302 856-3001 - Fax

Connect with Senator Carper online:

[<image001.png>](#) [<image002.png>](#) [<image003.png>](#) [<image004.png>](#)

From: Meg Kelly [<mailto:meghankellyesq@yahoo.com>]
Sent: Thursday, September 03, 2015 9:17 AM

To: Wescott, Jymayce (Carper) <Jymayce_Wescott@carper.senate.gov>
Subject: Fw: DEFEATING ISIS/ISIL

Thank you for your kindness and open mind Jymayce.

Per our discussions, my cousin Tim is in the Middle East, and is in charge of a prison camp. I think more violence may be fuel to ISIS's flame. Thank you for forwarding this information to the Honorable Senator Carper.

Best regards,
Meg Kelly, Esq.

Licensed DE, DC, PA, US Supreme Court

<http://www.skadden.com/professionals/tim-t-mastrogiacomo>

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

From: Meg Kelly <meghankellyesq@yahoo.com>
To: WRDE <charleswatson@wrde.com>
Sent: Friday, July 10, 2015 10:14 PM
Subject: DEFEATING ISIS/ISIL

How do we defeat ISIS, not with blood, but with education. More blood will be fuel for their fire since people are being deceived that they are doing God's will by killing others and, if they should die they will go to heaven.

You have the power to prevent deception with the truth.

Last month, ISIS allegedly killed 27 Muslims during a Muslim holiday which prohibits violence, (at a mosque). ISIS is using God's name in vain, for it's own vanity and purpose by manipulating youngsters, and poor people to fight, fund and feed it's organization. ISIS is not adhering to the Koran. ISIS is like the mob. They adhere to no true religion that loves any God. They are their own Gods. People give the aid nations send to them to ISIS so they are not killed. It is logically incomprehensible that this cycle continues.

Let's educate people concerning ISIS's use of the name of God for their own purpose (NOT GOD'S). Please consider talking about this in order to prevent such deception and brainwashing. Would you be willing to talk about ISIS's use of God's name in vain (similar to the church's use during the crusades, Spanish Inquisition and arguably colonization for profit not for Christ, as acknowledged recently by our Pope recently)?

CSPAN had a program where witnesses explained that ISIS stole artifacts from countries and tried to sell them. Days later, on the regular news I saw alleged threats from ISIS and evidence of the destruction of certain artifacts. This is a brilliant way to increase demand and sell/save the artifacts for more money. CSPAN would permit you to use clips of the witnesses if you made a request.

[Contact | C-SPAN.org](http://C-SPAN.org)

Contact | C-SPAN.org

Contact Main Office 400 N. Capitol St., NW Suite 650 Washington, DC 20001
(202) 737-3220 (Mon-Fri 8:30am-5:30pm ET) Program Inquiries & Suggestions

Viewer Inquiries :

Preview by Yahoo

Visit on www.c-span.org

I don't think bloodshed will logically solve threats to our Nations security or prevent harm to people in other countries.

As a result, it's also a bad idea to train others to fight as we cannot control them and more blood will not bring peace. I have heard politicians request the US send weapons and train certain Sunnis (they believe a caliph can come from someone outside the lineage of Muhammed) so they can fight ISIS an alleged sect of Shiites (they believe the caliph must come from the lineage of Muhammed).

Say the trained Sunis succeed. They have been killing people of the same faith who allegedly love the same God because they disagree about who should lead their people. What's stopping the potential trained fighters from killing people with more fundamental differences like Jews and Christians if they are so willing to kill people of the same faith?

I think you have more power to stop violence through education than anyone else. Please think about it.

I imagine last months massacre at the mosque gave ISIS a lot of bad press, as today on yahoo news saw member of ISIS allegedly providing food to the poor. See, <http://news.yahoo.com/offers-mix-brutality-charity-during-ramadan-053544476.html>

If ISIS in fact did this, it was probably an attempt to create positive publicityer last months poor decision.

I am sad abut such unnecessary deaths. Will you please think about reporting on this? I have loved ones out there, and I do not want our troops to be in harms way unnecessarily.

Thank you,
Meg

Exhibit 6

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive

Dagsboro, DE 19939

The Honorable Judge and panel leader

The Honorable Paul S. Diamond

Attn: Clerk of Court

601 Market St Ste 16613,

Philadelphia, PA 19106

By email: paed_documents@paed.uscourts.gov

RE: In the Matter of Meghan Kelly/ Case 2:22-mc-00045 / Retired no longer
barred in Eastern District of PA/

November 19, 2022

Dear Honorable Judge Paul D. Diamond:

Thank you for your time and consideration. I am in receipt of the Order
disbarring me as retired.

On Friday November 19, 2022, I called the admissions department and
spoke with Gail Olson. She kindly confirmed that I am no longer barred in this
Honorable Court because I am retired in Pennsylvania. I have been retired from
Pennsylvania since 2018.

She indicated I am not disbarred due to discipline, but due to retirement. If
this is not correct, please correct my understanding. Otherwise, I intend to inform
other jurisdictions I am no longer barred in this Court due to retirement.

If I do not hear from you, I will assume my understanding is correct.

Thank you. I am really grateful I am not required to subpoena people I care about before your honorable court needlessly.

November 19, 2022

Respectfully,

/s/Meghan Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
Retired Bar Number 202268

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

Dated:

Nov. 19, 2021

Meghan Kelly
(printed)

Meghan Kelly
(signed)

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

CERTIFICATE OF SERVICE OF PLAINTIFF MEGHAN KELLY'S 107th Affidavit

I, Meghan M. Kelly, Esquire, hereby certify on 10/27/2023, I had a true and correct copy of the above referenced document, served to Defendants, through their counsel through email electronically:

Zi-Xiang Shen
Delaware Department of Justice
820 North French Street
6th Floor
Wilmington, DE 19801

Dated Oct. 29, 2023

Respectfully submitted,
Meghan Kelly
Meghan M. Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com

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

Dated: Oct. 29, 2023

Meghan Kelly (printed)

Meghan Kelly (signed)

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

PLAINTIFF MEGHAN KELLY’S 108th AFFIDAVIT

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

1. After my friend esteemed real estate attorney Richard Goll, Esq. died in 2016 I discovered he was taken advantage of by out of state title companies who practiced law without a license. I talked with colleagues in the real estate sections and discovered this misbehavior of non-lawyers practicing law was rampant in the state of Delaware. Nonattorneys lawyering messed up the chain of clear title with no attorney to call to correct the bad title.

2. Professional boards who are made up of business people with bias towards selling a product for a bottom line should not judge us. Lawyers are partial towards their own clients’ interest because it is in the lawyers’ interest to get paid. Judges and nonprofessionals are required to be impartial arbitrators of the law pursuant to the Equal protections clause of the 14th Applicable to the state and local governments and applicable to the federal courts pursuant to the 5th Amendments’ Equal Protections component.

3. In my complaint I included the attached two letters regarding seeking an exemption from bar dues for all attorneys facing economic hardship.

4. In the DE Supreme Court’s opinion the Court cited a case with a brilliant thoughtful argument by an attorney regarding separation of powers issues with regards to congress and the courts I attach hereto. See Exhibits 1 and 2.

5. I include this attached hereto should my case come back to this court for consideration of the Constitutionality of the separation of powers issue. (Exhibits 3 and 4)

6. Years ago my friend bought property where the real estate lawyer allegedly messed up. She contacted a number of lawyers and no one would help her. You see lawyers are partial to themselves. She said he was a county attorney and no one would dispute the bill board sold in bad faith and not disclosed to her at settlement that clouded her title to build on the land. She bought the land intending to build a two story building for a business on Route 26. She was not allowed to build it do to the hidden restriction.

7. We need judges to judge not professionals to judge who are partial to lawlessness leading to certain damnation in hell by compromising what is right for what is convenient or profitable towards themselves or clients. We need judges to be our heroes by requiring impartiality not partial professionals who sit on boards or partiality towards professionals and their studies called science sold to us to market products and services.

8. It is misleading when people teach competition improves innovation when those who compete provide the same or similar products and services that adhere to the subpar dumbed down standards to create essentially the same or similar not improved products and services. We need freedom to criticize unrestrained by defamation laws that arguably violate citizens free speech. US Amend I applicable to the states via the 14th.

9. Real estate deeds will be used to recoup real property to entities who are not required to pay taxes or be bound by the law down the line including the UN. I previously supplied to you the immunity they grant themselves. You are the judge of them in the US. They are not the judge. You determine when they recoup what the government collects and owes to entities who funnels through entities affiliated with them.

Thank you for your time and consideration.

Dated 10/29//23

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

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

Dated: Oct 30, 2023

Meghan Kelly (printed)


 (signed)

Exhibit 1

Kelly Nonlawyers lawyering nonjudges judging/ Gov granted authority to prevent the same?/ Fw: Dominic Meg Questions

From: Meg Kelly (meghankellyesq@yahoo.com)

To: zi-xiang.shen@delaware.gov

Cc: meghankellyesq@yahoo.com; anthony.sodroski@pacourts.us; harriet.brumberg@pacourts.us; david.weiss@usdoj.gov; supremectbriefs@usdoj.gov

Date: Sunday, October 29, 2023 at 01:51 PM EDT

Please see below regarding nonattorneys practicing law messing up the chain of title is the issue I sought to correct. That is why I ran for office.

Zi-Xiang,

Your clients have no jurisdiction to correct non attorneys from messing up harming the public while not paying taxes in DE if they are out of state title companies and non attorneys.

Maybe the ODC or another government entity such as the state Attorney General or US Attorney General should somehow be granted jurisdiction.

In my PA case in the motion for a rehearing I noted this concern. The US Supreme is more likely to grant me relief if opposing counsel copied here considers the ramifications of nonlawyers lawyering and non judges judging which is part of the scheme to eliminate the need for the government if its partners are taking over judging and ruling unrestrained by the just rule of law to eventually overthrow the government sometime after 2050.

Thank you,
Meg

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

From: Meghan Kelly <meghan.kelly@mcdonnelllawfirm.com>
To: "meghankellyesq@yahoo.com" <meghankellyesq@yahoo.com>
Sent: Tuesday, October 11, 2016 at 02:08:39 PM EDT
Subject: FW: Dominic Meg Questions

Warm regards,

Meghan M. Kelly, Esq.

Managing Delaware Attorney

McDonnell and Associates, P.A.

34026 Coastal Highway,

Bethany Beach, DE 19930

Cell: (302) 362-6551

office: (302) 313-9955

Fax: (404) 978-2643

meghan.kelly@mcdonnelllawfirm.com

www.mcdonnelllawfirm.com



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From: Meghan Kelly
Sent: Monday, August 29, 2016 9:13 PM
To: [REDACTED]
Cc: Meghan Kelly
Subject: [REDACTED] Questions

Hi [REDACTED]

What do you think of these questions?

Thank you?

Warm regards,

Meghan M. Kelly, Esq.

Managing Delaware Attorney

McDonnell and Associates, P.A.

34026 Coastal Highway,

Bethany Beach, DE 19930

Cell: (302) 362-6551

office: (302) 313-9955

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tail - Kelly Nonlawyers lawyering nonjudges judging/ Gov. et...

From: [Redacted]
Sent: Wednesday, August 03, 2016 2:12 PM
To: Meghan Kelly
Subject: RE: [RaPP] Title Company/Fee Splitting/Banking concerns

I agree. I can tell you which realty firm doing this. And, now a lender is doing same. They simply want us to show up and hold settlement.

Sent from my Verizon 4G LTE Droid

On Aug 3, 2016 2:10 PM, Meghan Kelly <[Meghan.Kelly@mcdonnelllawfirm.com](mailto: Meghan.Kelly@mcdonnelllawfirm.com)> wrote:

I am not aware of any real estate office that does such in Sussex County. Nevertheless, if they violate page 27 of the attached and receive fees for Delaware attorney work they may be in trouble. Delaware law requires an attorney, not only to attend the settlement but to perform legal work as defined in this opinion. It is different in every state.

I think it would be helpful if our section leader worked with the ODC on guidelines to prevent problems as our field is growing so fast. Have a good day.

Warm regards,

Meghan M. Kelly, Esq.
Managing Delaware Attorney
McDonnell and Associates, P.A.
34026 Coastal Highway,
Bethany Beach, DE 19930
Cell: (302) 362-6551
office: (302) 313-9955
Fax: (404) 978-2643
[meghan.kelly@mcdonnelllawfirm.com](mailto: meghan.kelly@mcdonnelllawfirm.com)
[www.mcdonnelllawfirm.com](http: www.mcdonnelllawfirm.com)



H
el

In addition, many new bankers allegedly indicate they are contacted by MD title companies for DE attorney legal work. I am concerned as there are new banks popping up everywhere in Sussex County. I fear they are not educated in DE requirements.

Is it possible to have an educational mixer with banks so we can educate them and network too. (They bring us business too)

My local Bethany Fenwick Chamber of Commerce negotiates free meals for our events. They are master marketers as it brings the restaurants more business once we get a delicious taste of their food. We may be able to negotiate something for such an event. Prevention is better than cure. I would prefer preventing issues relating to local businesses that support our community.

Thank you. Have a great day!

DRPC 5.4

"Professional independence of a lawyer

(a) A lawyer or law firm shall not share legal fees with a nonlawyer, except that:

- (1) an agreement by a lawyer with the lawyer's firm, partner, or associate may provide for the payment of money, over a reasonable period of time after the lawyer's death, to the lawyer's estate or to one or more specified persons;
 - (2) a lawyer who undertakes to complete unfinished legal business of a deceased lawyer may pay to the estate of the deceased lawyer that proportion of the total compensation which fairly represents the services rendered by the deceased lawyer;
 - (3) a lawyer who purchases the practice of a deceased, disabled, or disappeared lawyer may, pursuant to the provisions of Rule 1.17, pay to the estate or other representative of that lawyer the agreed-upon purchase price;
 - (4) a lawyer or law firm may include nonlawyer employees in a compensation or retirement plan, even though the plan is based in whole or in part on a profit-sharing arrangement; and
 - (5) a lawyer may share court-awarded legal fees with a nonprofit organization that employed, retained or recommended employment of the lawyer in the matter.
- (b) A lawyer shall not form a partnership with a nonlawyer if any of the activities of the partnership consist of the practice of law.
- (c) A lawyer shall not permit a person who recommends, employs, or pays the lawyer to render legal services for another to direct or regulate the lawyer's professional judgment in rendering such legal services.

Warm regards,

Meghan M. Kelly, Esq.

Managing Delaware Attorney

McDonnell and Associates, P.A.

34026 Coastal Highway,

Bethany Beach, DE 19930

Cell: (302) 362-6551

office: (302) 313-9955

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meghan.kelly@mcdonnelllawfirm.com

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From: Meghan Kelly

Sent: Thursday, July 07, 2016 5:44 PM

To: 'Valerie Carr'; rapp@delawlist.org

Cc: Meghan Kelly

Subject: New Castle County Transfer Tax Form/Leased land Owned Homes/Real and Personal Property Committee

Hi Valerie,

A while back I spoke with Michael E. Kozikows concerning the attached New Castle County Transfer Tax For. He

indicated that I may use the attached Word version. He further advised that the County has the right to charge a nonconformity fee, but he will not do so. The PDF is not easily writeable. Could you please have our section persuade the County to make an official writeable form like Kent and Sussex?

On another note, we have a trend in Sussex where people lease lands and own the homes. My esteemed colleague and his law firm handles most of these sales, but I hear so many complaints about them. One realtor I spoke with today lamented that the Town of Lewes allegedly received gifted property from William Penn? The town was prohibited from selling it, so they lease it. I think the logical intent of making such a gift was to prevent it from being built up, but that intent doesn't seem to be fulfilled when the land is leased and buyers buys, builds and owns the homes on the leased land.

I do not have enough information and this is mere hearsay, but it might be nice to look into whether these violate the rules against perpetuities or whether they are shielded in permitted trusts. They are popping up eve



proposed law.docx
17.6kB

Exhibit 2

Real estate lawyers represent buyers to protect buyers

Matter of Mid-Atlantic Settlement Services, Inc.

Supreme Court No. 102, 2000, UPL 95-15 (5/31/00)

The Delaware Supreme Court approved the Decision of the Board on the Unauthorized Practice of Law, dated March 8, 2000, determining that Delaware attorneys must participate in all real estate settlements. The question resolved by the Board was whether a Delaware attorney is required to conduct a closing of a sale of Delaware real property or of a refinancing loan secured by Delaware real property. The Supreme Court affirmed the Board's recommendation that:

1. An attorney licensed to practice law in Delaware is required to conduct a closing of a sale of Delaware real property.
2. An attorney licensed to practice law in Delaware is required to conduct a closing of a refinancing loan secured by Delaware real property.
3. An attorney licensed to practice law in Delaware is required to be involved in a direct or supervisory capacity in drafting or reviewing all documents affecting transfer of title to Delaware real property or where Delaware real property is used as security for the repayment of a debt or the performance of an obligation, with the exception of home equity loans in which the lender is acting in a pro se capacity and no evaluation of exceptions to title is required.
4. The participation of an attorney licensed to practice law in Delaware is necessary in evaluating the legal rights and obligations of the parties, representing the buyer in examining the title and removing exceptions to the title, supervising the disbursement of funds, and responding to questions concerning the legal effect of documents and ramifications of a transaction by which title to Delaware real property is transferred or where Delaware real property is used as security for the repayment of a debt or the performance of an obligation, with the exception of home equity loans in which the lender is acting in a pro se capacity and no evaluation of exceptions to title is required.

When we represent the interest of both lawyers, including me have the clients sign a conflict of interest letter. The attorney who helped my friend who allegedly also later became or used to be a court attorney did not do this. 😞

Exhibit 3

EFiled: Aug 10 2022 11:26AM EDT
Filing ID 67917584
Case Number 58,2022



IN THE SUPREME COURT OF THE STATE OF DELAWARE

IN THE MATTER OF A MEMBER
OF THE BAR OF THE SUPREME
COURT OF DELAWARE

§
§ No. 58, 2022
§ Board Case No. 115327-B
§
§
§

MEGHAN M. KELLY,
Respondent.

Submitted: June 7, 2022
Decided: August 10, 2022

Before SEITZ, Chief Justice; VALIHURA and VAUGHN, Justices.

ORDER

PER CURIAM:

It appears to the Court that:

(1) This is an attorney disability proceeding. On February 18, 2022, a panel of the Board on Professional Responsibility ("the Board") filed its report and recommendation ("the Report") with this Court. The Report recommended that the Court transfer the respondent, Meghan M. Kelly, Esquire, to disability inactive status under Rule 19(b) of the Delaware Lawyers' Rules of Disciplinary Procedure ("DLRDP"). Kelly filed objections to the Report, ODC responded to the objections, and Kelly filed a reply in support of her objections.¹ For the reasons set forth below, the Court accepts the Report and transfers Kelly to disability inactive status.

24 page
opinion
to cover
up its
own
misconduct
:(

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for in

¹ On the same day her reply was due, Kelly filed a motion to exceed the 5,000 word-count set by the Court on March 29, 2022. Although the motion failed to identify the amount of additional words requested and the reply is almost double the 5,000 word-count, the Court grants the motion. Based on her misreading of Court of Chancery Rule 178B, which applies to guardianship matters

We reach this conclusion for somewhat different reasons than those articulated by the Board panel.⁹

(20) As the Board panel recognized, admission to the Delaware Bar requires attorneys to take an oath or affirmation to “support the Constitution of the United States and the Constitution of the State of Delaware” and to “behave...in the office an Attorney within the Courts” to the best of their “learning and ability and with all good fidelity as well to the Court as to the client.”¹⁰ Delaware attorneys must also comply with the Delaware Lawyers’ Rules of Professional Conduct (“DLRPC”), which require attorneys to represent clients competently,¹¹ not undertake a representation if their physical or mental condition materially impairs their ability to represent a client,¹² and refrain from engaging in conduct prejudicial to the administration of the justice.¹³ The legal “profession holds out to the public all its members in good standing as being competent, honest and devoted to their clients’ interests.”¹⁴

⁹ The Board concluded that Kelly was “unable to separate her individual political and religious pursuits from her legal practice and from the duties she owes to the Court and the professional practice within this State as a licensed attorney.” Report at 5.

¹⁰ Del. Supr. R. 54. See also 10 Del. C. § 1907 (requiring attorneys to take oath upon admission to the Delaware Bar).

¹¹ DLRPC 1.1 (“Competent representation requires the legal knowledge, skill, thoroughness and preparation reasonably necessary for the representation.”).

¹² *Id.* 1.16(a)(2).

¹³ *Id.* 8.4(d).

¹⁴ *In re Member of Bar*, 257 A.2d 382, 383 (Del. 1969).

This attorney made a profoundly clever argument that courts violate separation of powers. So smug!

b. As set forth in DLRDP 19(e), this Court may take or direct any action upon the filing of a petition for transfer to active status that it deems necessary or proper, including a remand to the Board for a hearing and recommendation to determine whether the disability has been removed, and may order an examination by qualified medical experts.

c. Kelly shall not practice law in this State.

d. This Order shall be made public.

← Not made at date of order
Against my religious beliefs

Exhibit 4

Supreme Court of Delaware

In re Member of Bar

257 A.2d 382 (Del. 1969)

Decided Jul 9, 1969

July 9, 1969.

Proceedings on a Final Report of the Censor Committee.

Charles S. Crompton, Jr., of Potter, Anderson Corroon, Wilmington, for the Censor Committee.

Wayne N. Elliot, of Prickett, Ward, Burt Sanders, Wilmington, for respondent.

WOLCOTT, C.J., and CAREY and HERRMANN, JJ., sitting.

WOLCOTT, Chief Justice.

This Court promulgated, effective January 1, 1968, Rule 32A, establishing a Clients' Security Trust Fund "to establish as far as practicable, the collective responsibility of the Profession in respect to losses caused to the public by defalcations of members of the Bar".

The trust fund thus established is built up by annual payments from members of the Bar upon a graduated scale, depending upon the number of years of practice. By Section (5) of the Rule, these payments are required "As a condition to continuing membership in the Bar of this Court". Section (5) (d) provides that any failure by a member of the Bar to comply with the Rule shall be referred by the trustees of the Trust Fund to the Censor Committee of this Court.

The respondent, presumably to test the constitutionality of Rule 32A, refused to make the payments to the
383 Trustees required of him by Section (5), whereupon the Trustees referred his refusal to the *383 Censor Committee. The Committee conducted proceedings in accordance with Rule 32 of this Court and filed its report upholding the validity of Rule 32A, and recommended that appropriate disciplinary action be taken against the respondent.

Respondent contends that Rule 32A is unconstitutional on two basic grounds:

1. That the power of this Court over duly admitted members of the Bar is limited to the negative right to discipline for moral or professional misconduct;
2. That the payment required by Rule 32A is a tax which this Court is without power to impose.

In *Delaware Optometric Corp. v. Sherwood*, [36 Del. Ch. 223](#), [128 A.2d 812](#), we had occasion to consider the inherent powers of this Court to establish and control the Bar. We pointed out that lawyers as officers of the Court were an important adjunct to the administration of justice, and that the profession from its inception in England was affected with a public interest. It was this concept which the colonists brought with them from England to this State. The authority, as well as the duty, to establish the Bar and to maintain its standards exists

inherently in this Court as the highest court of the State, independent of any statutory grant of authority, although there does exist in our Code such authority. See 10 Del. C. § 161, 1905, 1906. We regard these statutory enactments as nothing more than legislative recognition of the inherent powers of this Court.

The justification for the existence of this power inherently in the courts is the necessity for the proper administration of justice, which can be achieved only if the procedures and practices of the courts are fair and reasonable, and the officers of the court, the lawyers, are competent and ethical. Thus it is that by rule of court requirements are established for admission to the Bar, and standards of ethical conduct established, to which all lawyers must conform to continue in the practice of law. The policing of these requirements is achieved by the inherent power of the court to discipline lawyers for violations.

We do not believe there is any dispute between counsel concerning the foregoing. There is a dispute, however, between them as to whether or not the purpose of the Clients' Security Trust Fund falls within the scope of the inherent power of the Court. The stated purpose of Rule 32A is "to establish as far as practicable the collective responsibility of the Profession in respect to losses caused to the public * *."

We think this purpose falls within the scope of our inherent power. The proper administration of justice will falter if the Bar as a whole loses the confidence of the public as to legal service to which it has a maintained monopoly. The reputation of the Bar as a whole suffers when one of its members embezzles, even though the wrongdoer is a conspicuous exception among honest lawyers who join in the condemnation of his misconduct. Too often, however, the public thinks only of the defrauded client who must absorb the loss caused him by one who had been held out as a member of a privileged and trustworthy profession to which the public must, of necessity, turn.

It must be borne in mind that lawyers, constituting the Board of Bar Examiners by appointment of this Court, control admissions to the Bar. In a sense, therefore, the profession holds out to the public all its members in good standing as being competent, honest and devoted to their clients' interests. This, it seems to us, is in the nature of a collective representation by the Bar to the public, and justifies a collective acceptance of responsibility when one of its members is false to his oath and the common precepts of honesty.

The whole matter is summed up in the following excerpt from the Report of the Special Committee on Clients' Security Funds, 84 Reports of A.B.A. 605:

384 "Chief Justice Vanderbilt and Reginald Heber Smith have placed its justification *384 on an unassailable basis. We are engaged in a profession that serves the public and enjoys a monopoly in that service. We rightfully control the machinery governing admission to our privileged ranks and the discipline and disbarment of those who transgress. We lawyers cannot truly deny the existence of that control on the ground that the judiciary, the law schools and the legislature also have a voice. The public looks to the profession to keep its own house in order and when a lawyer embezzles his client's funds, the whole bar is blackened in the public eye. The rest of us, as well as the embezzler, are considered at fault because we have failed to police our own ranks and to prevent the defalcation.

"Even if in fact the profession could properly feel without blame, the defrauded client is a casualty whose injury arises out of the practice of our profession. Most of us approve the principle underlying the workmen's compensation laws. Why should any lawyer recoil from the Client's Security Fund on the ground that it requires contribution from those who are not responsible for the embezzlement?"

We are of the opinion, therefore, that Rule 32A, which seeks to insure the Bar's reputation, is action taken by the Court within the scope of its inherent power to sustain the standards of the Bar. Furthermore, we think the method set up by Rule 32A is reasonable in that as a practical matter it is calculated to achieve the valid stated purpose. Nor is the rate of assessment upon lawyers unreasonable. It is graduated in amount from \$10 to \$100 annually depending upon length of service at the Bar, and is thus presumably based upon ability to pay. Furthermore, there is a provision in the rule which permits adjustment in the rates to avoid hardship.

The respondent has argued that the rule lies beyond our power because we are limited to the powers of the common law court in the control of the Bar. He points out that at common law the courts had only the negative powers of suspension or disbarment over barristers, and that, while Delaware does not and never has distinguished between barristers and attorneys and solicitors, the respondent stands before us in his capacity as a barrister.

We think the argument unsound. Delaware has never had a separate class of lawyers performing the role of barrister only. Our lawyers combine both the function of the barrister and the function of an attorney and solicitor. With respect to the latter class, the English courts have special control. 3 Halsbury's Laws of England (3rd Ed.) 35. We think we have the same special control over our Bar. As a matter of fact, if the respondent were correct in this contention, it would be doubtful if this Court could exercise any control over admissions to the Bar since, in England, admission to the ranks of barristers was in the sole control of the Inns of Court. Yet, control over admission to the Delaware Bar by the Courts has existed since 1676.

Next, the respondent attacks Rule 32A on the ground that in minimal effect it establishes an integrated Bar which it is urged this Court is powerless to create by rule. The answer to this contention is simply that the creation of a Clients' Security Trust Fund does not establish an integrated Bar. No lawyer is required to join a Bar Association and, indeed, some of our Bar belong to no such association. The Fund is collected and administered by Trustees appointed by this Court and not by the State Bar Association.

This conclusion is pointed up by the remarks of Mr. Justice Douglas dissenting in *Lathrop v. Donohue*, [367 U.S. 820](#), [81 S.Ct. 1826](#), [6 L.Ed.2d 1191](#), distinguishing assessments to a Client's Security Trust Fund from dues payable to an integrated Bar which, in his opinion, violated the lawyer's right of freedom of association. Indeed, even if the creation of this Fund were considered to establish an integrated Bar, which it does not, it would still lie within the powers of this Court. See, e.g., *Integration of Bar Case*, [244 Wis. 8](#), [11 N.W.2d 604](#), [385 12 N.W.2d 699](#), [151 A.L.R. 586](#). *385

Finally, respondent argues that the assessment laid upon Delaware lawyers is unconstitutional because it is the levying of a tax which is a legislative and not a judicial function. The short answer to this contention is that the payment required is an assessment and not a tax. We have held that we have the power to order the creation of the Fund and, that being so, it necessarily follows that we have the power to direct the imposition of a reasonable assessment to accomplish the purpose.

There seems to be no reported decision upon the question except the dictum of Mr. Justice Douglas in the *Lathrop* case. However, as of June 15, 1967, there were Clients' Security Funds operating in 26 states. [92 Reports of A.B.A. 588](#). To date, none of these funds have been questioned, at least in any reported decision. While this fact is, of course, not conclusive, nevertheless, it must have some persuasive effect.

To sum up, we hold that the promulgation of Rule 32A is a valid exercise of our inherent power to maintain the standards required of the Bar, and to uphold its reputation by the imposition of collective responsibility for the conduct of its members. Accordingly, the refusal by a member of the Bar to pay the assessment required of him

is professional delinquency on his part.

Presumably, the respondent refused to pay in order to make a test case on the rule. On that assumption, we accept the Censor Committee's recommendation of a discipline by ordering him to pay all arrearages in his assessments to the Trustees of the Client's Security Trust Fund within 15 days of the entry of an order upon the Committee's Final Report. Upon compliance by the respondent, the matter will be at an end. If noncompliance continues, it should be reported to this Court for further consideration and action.



Exhibit 5

MEGHAN MARIE KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939

January 7, 2021

Delaware Supreme Court
55 The Green
Dover, DE 19901

**RE: Covid 19 order/Please suspend attorney fees for lawyers
unemployed due to the pandemic**

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

Thank you for allowing lawyers to file pleadings with the court via email so we do not die of Covid 19.

I am writing to respectfully request this Honorable Court waive attorney registration fees for lawyers, out of work, due to the pandemic.

I worked in 2018, but in 2019-2020, I worked without pay, actually sacrificing from what I little I had by contacting federal law makers in an attempt to:

1. Prevent the elimination of social security and Medicare, replaced with Matthew 6 violations (forced volunteering or business, not for profit and charitable donations and fundraising which I believe violate Jesus's teachings leading to harm and hell by teaching giving to get is love, driving out God, love, from the hearts of men replaced with business greed, which I believe is the mark of the damned should they not unhardened their hearts).

2. Prevent oil and gas drilling up and down our coast.

On an aside, I am disappointed in my relative by affinity, Mark Braden, Esq., former counsel to the Republican party in DC. His kid has a job related to off shore drilling. So did one of Mr. George Cole's kids. Mr. George Cole retired from office, as the longest serving local politician in one seat in Delaware's history. (Mike Castle does not count since he hopped seats.). It is wrong to compromise the environment and people's lives to serve your own family, especially by political people charged to serve the public.

3. Improve healthcare. Our healthcare is terrible because our laws and policies reward misbehavior and bad or different, not better care, at the expense of human life and health. Changing the laws would improve care. Throwing money at fundraisers and healthcare is incentive for more bad care, greed for more and more money.

Just decrees teach people to care about other people. Unjust decrees teach people to love money, rewarding misbehavior, encouraging folks to harm one another by ignorance or otherwise to serve money.

4. Prevent the kill old people laws suggested to save money. People are priceless, not price tags. The elderly, ill and vulnerable are easily manipulated into believing hurting themselves helps others through the death with dignity acts.

There is too much temptation for people to encourage the elderly to harm themselves, die, and sadly I believe go to hell. Judas and Saul went to hell in the Bible for killing themselves.

Leaders misbehave when they draft laws and policies which encourage those they serve to die and potentially go to hell. I want people to live and have eternal life. Per the bible, just decrees and justice in the courts has the power to save lives and eternal lives.

You really have the power to be life savers and eternal life savers as judges, via correction to prevent condemnation in hell for the love of money driving out love for humanity.

5. I proposed 5 articles of impeachment and contacted all 541 federal law makers.

Since, I did not work during 2019-2020, I am not eligible for the \$600 bail out, and will not likely be eligible for future bail outs.

My old law firm was interested in me in 2020. I was negotiating for a position, per the attached emails. I stopped the negotiations to sue the Democrats because seeking to do the right thing is more important than money. Then, the pandemic hit. I withdrew my law suit since I did not want people to die, and reached out to my law firm. Negotiations are on a stand still. Covid19 hampered prospects.

I am concerned about dying for dollars, during this pandemic. I actually was born with breathing problems, and have severe allergies that make my throat close up. So, catching covid19 would likely be a death sentence for me.

Thank you for considering my life potentially more valuable than a few hundred dollars.

The Supreme Court could possibly include a suspension of lawyer fees, solely for the unemployed, in their covid19 measures. I tried to contact the Governor too. The Governor could also include a suspension for licensure fees for those unemployed, limited to those not using their license during the pandemic, too.

Thank you for your kind consideration.

Respectfully submitted,

Meghan Kelly, Esquire
Pro Se, Bar # 4968
34012 Shawnee Drive
Dagsboro, DE 19939
(Word Count 76P6)

Exhibit 6

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 so-called 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.

Respectfully submitted,

Meghan Kelly, Esquire

CC: LD, via Email

Bar # 4968
34012 Shawnee Drive
Dagsboro, DE 19939
(Word Count 1431)

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

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

CERTIFICATE OF SERVICE OF
PLAINTIFF MEGHAN KELLY'S 108th Affidavit

I, Meghan M. Kelly, Esquire, hereby certify on Oct 30, 2023, I had a true and correct copy of the above referenced document, served to Defendants, through their counsel through email electronically:

Zi-Xiang Shen
Delaware Department of Justice
820 North French Street
6th Floor
Wilmington, DE 19801

Dated 10/30/2023

Respectfully submitted,
Meghan Kelly
Meghan M. Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com

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

Dated: 10/30/2023
Meghan Kelly (printed)
Meghan Kelly (signed)