No			

# IN THE SUPREME COURT OF THE UNITED STATES MEGHAN KELLY, PETITIONER

V.

# THE UNITED STATES OF AMERICA, THE PRESIDENT OF THE UNITED STATES, PRESIDENT DONALD TRUMP, RESPONDENT ON PETITION FOR A WRIT OF CERTIORARI TO THE DELAWARE SUPREME COURT

PETITION FOR WRIT OF CERTIORARI

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#### **QUESTIONS PRESENTED**

- I. Whether failure to serve anyone my Delaware Supreme Court Brief, after the Defendant, President Trump, was removed from office was fatal error, given no relief could be made by Defendant, Former President Trump, since only a sitting President can afford relief, and it was not ripe to move to substitute or serve President Biden without a favorable determination on standing.
- II. Whether the Delaware Supreme Court erred in concluding Executive Order 13798 is Constitutional by misapplying arguments related to different executive orders Executive Orders 14015, 13831, 13559, 13198, 13199, 13279, 13342 and 13397, and by overlooking my argument that Executive Order No. 13798, is unconstitutional in violation of the Establishment clause by allowing religions, through churches, temples, mosques or other religious organizations to back government parties or government agents or potential government agents with money, donations, support or otherwise, giving the blasphemous backing of God and religions for the vanity of mere men in place of God, upsetting me with foreseeing physical manifestation of emotional distress including grinding of teeth, tears and at times increased heart pressure, in addition to establishing government religion which substantially burdens my free exercise of religion by those who adopt Trumpreligious beliefs.
- III. Whether the Delaware Supreme Court erred in concluding the exception, capable of repetition yet evading review did not apply to prevent this

matter to prevent it from being moot since former President Trump may become President, and since President Biden may be substituted for Former President Trump to dissolve government religion to reduce the substantial burden upon my free exercise of religion pursuant to *Religious Freedom Restoration Act*, 42 USCS § 2000bb (1-4), should standing be found.

- IV. Pending a favorable determination on standing, whether I should be permitted to continue this suit, by seeking to substitute President Biden for former President Trump in this action to prevent the continued establishment of government-religion by President Biden's continued enforcement of Executive Order 13798 and passage of Executive Orders 14015, and enforcement of related Executive Orders 13831, 13559, 13198, 13199, 13279, 13342 and 13397.
- V. Whether the Delaware Supreme Court erred in concluding I did not have standing to seek to enjoin former President Trump from establishing government-religion by overlooking the misconduct establishing government religion, and the causal link, the direct harm to me substantially burdening my free exercise of religion, speech and association, causing emotional distress resulting in physical symptoms by his conduct blaspheming my God, tears and, increased heart pressure, and attacks by strangers adopting government-religious beliefs and even by court agents and arms in this case, based on my perceived religious affiliation as anti-Trump- religion, but for the Presidents' misconduct, and the relief that would

afford me a remedy, personally, as a party of one, the enjoining of the President and future Presidents from continued establishment of government religion by inter alias enforcing certain Executive orders.

#### LIST OF PARTIES

All parties appear in the caption of the case on the cover page. I sued President Trump in his official capacity, as the President of the United States, not in his individual capacity, per my Second Amended Complaint which was not accepted by the Chancery Court. He is no longer President. I do not seek to sue him as a private person, no longer President. Only a sitting President can grant the relief I seek. Should, a favorable determination on standing be given, I seek permission, not a guarantee to continue to seek to substitute President Biden for President Trump, in the Chancery Court below. It is not ripe to sue President Biden without the Chancery Court's authority.

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**Appendix 1-c** Docket *Kelly v Trump* Delaware Supreme Court Case No. 0809, 2020

Appendix A The Delaware Supreme Court opinion of which review is sought, *Kelly v. Trump*, No. 119, 2021, 2021 WL 2836635 (Del. July 7, 2021).

**Appendix B** The Delaware Supreme Court Order, denying a Rehearing, *Kelly v. Trump*, No. 119, 2021 (Del. July 19, 2021)

**Appendix B-1** Petitioner's Unopposed Motion for a reheargument before the Delaware Supreme Court

**Appendix C** The Chancery Court's opinion overruling Appellant's Exceptions to Master's Final Report, *Kelly v. Trump*, No. 2020-0809-PWG, 2021 WL 1175423 (Del.Ch. Mar. 26, 2021)

**Appendix C-1** Email from the Chancery Court staff confirming the opinion was not mailed to Defendant

Appendix D The unpublished Master's Final report recommending dismissal as legally frivolous for failure to allege standing, available at *Kelly v. Trump*, No. CV 2020-0809-PWG, 2020 WL 6392865 (Del. Ch. Nov. 2, 2020), report and recommendation adopted, (Del. Ch. 2021), aff'd, No. 119, 2021, 2021 WL 2836635 (Del. July 7, 2021)

**Appendix E** Petitioner's Supreme Court Brief

Exhibit A-4 to Appendix E Appellant's Motion for the Delaware Supreme Court to rein in its arms through its agents from unlawfully pressuring appellant to forgo or impede her case to protect her free exercise of religion by relief it deems just, and exhibits thereto, Exhibit 55 of the brief below, the December 1, 2020 letter regarding due process concerns to the Master, and the October 19, 2020 letter to the Master regarding the fact I am pro se, not represented by counsel, (Docket 89-90 also separately, Docket 54 and Docket 36)

## Exhibit A-5 to Appendix E

**Appendix F** Petitioner's Chancery Court Brief, Plaintiff's Brief in Support of her exceptions to Special Master's final report, dated November 2, 2020

Exhibit A of Exhibit F Appellant's Initial Complaint (Docket 59-50)

Exhibit 1 to Appendix F Proof Meghan Kelly filed ODC Complaints against Justice Kavanaugh (Docket 60)

Exhibit 2 to Appendix F Plaintiff's Complaint against the Defendant Democratic Party, et al, in the Chancery Court for the State of Delaware based on requiring I disobey Jesus to run for office, Case Number 2020-0517 (Docket 60)

**Exhibit 3 to Appendix F** E-mails to Cathy Howard, requesting to affirm not swear into the admission of the bar which were ignored and denied (Docket 60)

Exhibit 4 to Appendix F Letters to the family Court regarding the practice of family law violates my religious beliefs (Docket 60)

**Exhibit 5 to Appendix F** Letter to the Honorable Justice Henry Dupont Ridgely, regarding concerns about the judiciary's appearance of bias against perceived outsiders. (Docket 60)

**Exhibit 6 to Appendix F** E-mail to Senator Carper regarding using God's name in vain inciting religious violence, and rewarding or funding such violence under the guise of charity (Docket 60)

Exhibit 7 to Appendix F The 5 separate articles of Impeachment I sent to federal legislators. (Docket 60)

Exhibit 8 to Appendix F A how to prevent oil drilling Appellant sent to federal law makers (Docket 63)

Exhibit 9 to Appendix F An Executive Order in issue on this appeal (Docket 63)

Exhibit 10 to Appendix F Article, The Hill, Trump: Jews who vote Democrat show 'lack of knowledge or great disloyalty', by Brett Samuels, 08/20/19, 03:38 PM. (Docket 63)

Exhibit 11 to Appendix F MSNBC, Trump calls for discrimination against Muslims, By Jane C. Timm, 12/07/15 (Docket 63) Exhibit 12 to Appendix F Article, The Hill, *Ivanka Trump will have an official*White House position, By Olivia Beavers, 03/29/17 (Docket 63)

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Exhibit 16 to Appendix F On Russian bounties, what did Trump know and when did he know it?, By Steve Benen, June 30, 2020, 8:00 AM EDT (Docket 63)

Exhibit 17 to Appendix F Article, NPR, 'You Can Do Anything': In 2005 Tape,
Trump Brags About Groping, Kissing Women, By Jessica Taylor, October 7, 2016
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Exhibit 18 to Appendix F Article, Business Insider, 11 insults Trump has hurled at women, by John Walsh, Oct 17, 2018 (Docket 63)

Exhibit 19 to Appendix F Article The Guardian, The Trump allegations A list of the sexual misconduct accusations made against Donald Trump. He has denied the allegations, by Lucia Graves and Sam Morris, November 6, 2019 (Docket 63)

Exhibit 20 to Appendix F Article, ABC News, Donald Trump Sells Chinese Goods

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Exhibit 21 to Appendix F Article, CNN, Trump wants to create 10 million jobs in 10 months. Here's why that might be tricky, By Anneken Tappe, CNN Business, August 28, 2020 (Docket 62)

Exhibit 22 to Appendix F Article, USA TODAY, Fact check: President Donald Trump donates his salary, but he still makes money, by Molly Stellino, published July 11, 2020 (Docket 63)

Exhibit 23 to Appendix F Article, 'No Blame?' ABC News finds 54 cases invoking 'Trump' in connection with violence, threats, alleged assaults. President Donald Trump insists he deserves no blame for divisions in America, By, Mike Levine (Docket 64)

Exhibit 24 to Appendix F Article, Washington Post, The Trump administration said that militarizing the police reduces crime. Is that true, by Ayse Eldes and Kenneth Lowande, June 1, 2020 (Docket 71)

Exhibit 25 to Appendix F CBS News, "When the looting starts, the shooting starts": Trump tweet flagged by Twitter for "glorifying violence", May 29, 2020 (Docket 71)

**Exhibit 26 to Appendix F** copy of the web site worldometer, to show healthcare is the biggest global money maker and expense. (Docket 71)

**Exhibit 27 to Appendix F** The Hill, Trump eases ban on political activity by churches, By Jordan Fabian and Naomi and Jagoda, 05/04/17. (Docket 71)

Exhibit 28 to Appendix F Washington Post, Paula White, Trump's key spiritual adviser, will join the White House, By Sarah Pulliam Bailey November 1, 2019 (Docket 71)

Exhibit 29 to Appendix F National Catholic Reporter, The key evangelical players on Trump's advisory board, Sep 5, 2017, by Adelle M. Banks, Religion News Service (Docket 71)

Exhibit 30 to Appendix F Fox News, Trump responds to Milley apology for Lafayette Square photo op, By Brooke Singman, published June 12, 2020 (Docket 71)

Exhibit 31 to Appendix F article, The Hill, Trump targets Democrats over Pledge of Allegiance, By Tal Axelrod, 08/22/20 (Docket 65)

Exhibit 32 to Appendix F Article, HuffPost, Trump Claims COVID-19 Is God Testing Him After He Built 'Greatest Economy In History' The president described boasting to God about his economic successes before the coronavirus pandemic., By Carol Kuruvilla, 08/17/2020 (Docket 66)

Exhibit 33 to Appendix F Article, The Rolling Stone, Trump: People Are Saying 'Merry Christmas Again' Thanks to Him, By Peter Wade, Dec. 23, 2019 4:42 (Docket 67)

Exhibit 34 to Appendix F Article, Fox News, 'I hope it's true': Trump responds to claim he was chosen by God, By Caleb Parke, June 25 (Docket 68)

Exhibit 35 to Appendix F Article, Fox News, University professors say more church goers believe Trump is 'anointed by God', By Caleb Parke, May 13, 2020 (Docket 69)

Exhibit 36 to Appendix F Article, CBS NEWS, Trump tweets quote calling him the "second coming of God" to Jews in Israel, By Sophie Lewis, Aug. 21, 2019 (Docket 70)

Exhibit 37 to Appendix F Article, The Hill, Trump: 'We moved the capital of Israel to Jerusalem. That's for the evangelicals', By Aris Folley, 8/18/2020, (Docket 71)

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**Exhibit 40 to Appendix F** BBC, What are the sexual allegations against Donald Trump?, dated June 25, 2019 (Docket 74)

Exhibit 41 to Appendix F Religious News Service, Paula White to head Trump's faith office, by Jack Jenkins and Adelle M. Banks, November 1, 2019 (Docket 75)

Exhibit 42 to Appendix F The Hill, Trump claims Biden is 'against God' and will 'hurt the Bible' By Brett Samuels, 08/06/20 (Docket 76)

Exhibit 43 to Appendix F Documents regarding healthcare including: 1. Coastal Point, Guest Column, Representative candidate says health is wealth, By Meghan Kelly, Esq., Candidate Delaware House of Representatives, 38th District, 2. Document, "Your Health is your Wealth You are Priceless. Not a price tag! Kelly seeks Federal Consideration of Health Care Proposal, 3. Meghan Kelly's teaching certificate, credibility, 4. Meghan Kelly's redacted law school transcript to show she took a course Health Care Finance and the course Law and Medicine while attending Duquesne School of Law, 5. Meghan Kelly's redacted undergraduate college transcript to show she took relevant courses related to: a. History of Western Medicine b. Economics, c. Medieval Philosophy, d. Psychology courses, 6. Evidence of surgery that requires I drink water, rest and eat so I do not faint or die due to dehydration when I have my period. I lose five pounds every month. This is still a challenge. I must assert my right to live because many people serve Satan by not wanting to be inconvenienced to care to adapt to safeguard my life, or the lives and health of others

Exhibit 44 to Appendix F Tweet by President Trump, "DEMS WANT TO SHUT DOWN CHURCHES PERMENANTLY. HOPE YOU SEE WHAT IS HAPPENING. VOTE NOW!" (Docket 78)

**Exhibit 45 to Appendix F** The New York Times, A Regulatory Rush by federal agencies to secure Trump's legacy, initially posted 10/16/2020, my copy is dated 10/17/2020. (Docket 79)

Exhibit 46 to Appendix F Article appellant drafted concerning 100s and thousands of dollars not getting into the Delaware coffers which could be easily corrected with the legislative pen, My comments to my corporate bar section, ignored, related to my concerns the baby boomers may be screwed out of their retirement and insurance if we do not make changes to care for them instead of what is easier and more profitable for us, the lawyers, and our potential clients, (Docket 80)

Exhibit 47 to Appendix F MSN, Daily News, Trump and aides attend indoor church rally in Vegas without masks, By Theresa Baine, 10/18/2020.

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Exhibit 48 to Appendix F Withdrawn unsubmitted article concerning a recent US Supreme Court case. Freedoms are not for sale, business is not religion, business greed is not God (Docket 82)

Exhibit 49 to Appendix F The Hill, Eric Trump claims his father "literally saved Christianity," By Celene Castronuovo, 10/7/20. (Docket 83)

**Exhibit 50 to Appendix F** Proof, documentation, Appellant sought a waiver to run for President and for Federal house of representatives without serving Satan by organized charity. (Docket 84)

Exhibit 51 to Appendix F Pamphlets sent out when I ran for local office referred in the brief, where I did not violate Jesus's teachings in Matthew 6:1-5 by organized fundraising or false charity (Docket 85)

Exhibit 52 to Appendix F Proof my health is affected by government religion (Docket 86)

Exhibit 53 to Appendix F BBC, Trump inciting violence, warns election official, 12/2/20 (Docket 87)

Exhibit 54 to Appendix F The Washington Post, Trump wants to change the libel laws. Here's how they came to be, By Patricia U. Bonomi, June 6, 2019 (Docket 88)

Appendix G Letter to the Supreme Court. Dated July 12, 2021, regarding a Chancery Court staff member directing me to cross out the address to the DE lawyer in order to prevent service, and the attached subpoenas, dated October 12, 2020

**Appendix H** Excerpts from Creature of Jeckyll Island, a Second look at the Federal Reserve, by Edward Griffin, 7th printing 1998, 3rd Ed., by American Media

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