APPENDIX L

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	§	APPEALS COURT
Respondent.	§	CASE NUMBER: 22:37372
v.	§	DISTRICT COURT
United States District Court,	§	Misc. No. 22-45
Eastern District of Pennsylvania	§	Judge, Paul S. Diamond

Appellant Meghan Kelly's Motion for Reconsideration of Order dated June 30, 2023 denying stay under Rules 2, 40, 1st, and 5th Amendment asserted rights to prevent irreparable injury

I, Plaintiff Meghan M. Kelly, pursuant to my 5th Amendment right to a fair trial to defend and preserve my private exercise of 1st Amendment rights to petition, speech, religious belief, exercise, and association, objection to compelled servitude invoking the 13th or other applicable law move for good cause under Federal Rule of Appellate Procedure Rules 2, 27, 35 and Rule 40 for an impartial panel or an en banc reconsideration of this Court's Order dated 6/3023, denying my Motion for a stay, attached hereto as Exhibit A, to prevent irreparable injury in terms of the loss of Constitutional liberties I require a fair opportunity to defend effectively on appeal in this case and the civil rights case in order to prevent the permanent loss of the exercise of fundamental rights including my private 1st Amendment right to petition, speech, religious belief, exercise of religious belief, 6th Amendment right to self-represent in state Court, 13th Amendment right against involuntary servitude, harm to health, loss of property interests, 6 new law suit needless law suits with a certain one before the US Supreme Court, loss of licenses, and other injuries caused by denial of a stay. I incorporate herein the entire record below in the District Court and in this Circuit Court in its entirety even though I only attach parts of the record and aver:

1. 6/30/23 this Court entered 7 judgments against me near closing time on the 4th of July holiday weekend in this matter and the Kelly v Swartz a Civil rights case 21-3198 (hereinafter referred to as "civil-rights"-case or "21-3198"). The denial of a stay, and a denial of

more time caused the Clerk to file an Order dismissing the case immediately for failure to prosecute. (Exhibits A, B). The Denial of a stay is what I seek consideration herein. I incorporate the Motion to Reopen this case in full with addendums. (Exhibit C)

2. This law suit arises based on disciplinary proceeding brought by the state of Delaware ("State"), with religious-political-poverty animus to punish me for my exercise of the private 1st Amendment right to petition, religious belief, exercise of religious belief, associate, speech, and to cover up the State's retaliation against me for petitioning the Court to safeguard my rights, predominately of the 1st Amend. right to exercise my religious belief over the course of about 20-years. I incorporate in its entirety the initial-civil-rights complaint I filed, and exhibits thereto (Exhibit D). The State retaliated against me for exercising my 1st Amendment right to petition for relief even prior to bar admission by punishing me for petitioning its partner grant me relief when my DE bar materials were destroyed by a leaky ceiling at the dorm room I resided. I passed the DE Bar on the first try, but lost expected income in the amount of about 2 million dollars over the years based on retaliatory action by the state. (See Exhibit A-4, A-5)

3. The DE-Supreme Court compelled me to violate my religious belief against swearing in despite my request to affirm upon my admissions to the DE bar . (Exhibit E). After I learned affirming violates Jesus Christ's teachings I petitioned the DE Supreme Court to be excused from affirming too. (Exhibit F). The court denied my request violating my 1st amendment right to exercise religious belief. Throughout the years DE Supreme Court members or agents have violated my Constitutional rights by disparate selective treatment. During my first appearance as a lawyer in Court, Judge Smalls called me a Philadelphia lawyer as if PA was a bad word. Former Supreme Court Justice told me to go back to PA after a CLE when I stole his thunder by answering a question on recent USSC proceedings not because I am smart, but

because I care and listened to public radio. My friend Stephanie Noble had dear eyes. I drafted the attached petition with the DE Supreme Court and created the bumper-sticker related to this when I ran for office in 2018, attached hereto, along with newspaper articles, one of which shows government agents chilled my speech. (Exhibit G-H-I)

4. The State disregarding my request against family-law appointments per the attached second request to be removed from the roster as against my religious belief, per the attached two Court petitions in Exhibits J K.

5. I petitioned the court in *Kelly v Trump* to alleviate a substantial burden upon my religious belief, and instead of alleviating it, they worsened it and demeaned me for my Bible references per Petition at 7. (Ex L)

6. I ran for local office in 2018. After I lost in 2018, I petitioned the democrats to run for Federal House without violating my religious beliefs with regarding to filing requirements. *See Matthew* 6:1-4. They said no. I filed a lawsuit against the democrats to enjoin them from requiring a filing fee in compelled violation of my religious belief. (Exhibit M) Per a staff member's request I also sent a letter to the US Supreme Court concerning running for president without compelled religious violations. (Exhibit N). Please note in *Kelly v Democrats* a Republican Steve Smyk rescued me when Rep Ron Gray attacked me on Bury the Hatchet Day, despite the fact I am a democrat, showing impartiality and leadership. (Exhibit O).

7. I am scared people talked about shooting me, destroyed my signs, and my opponent attacked me causing Senator Coons secret service men and Steve Smyk to rescue me.

8. The State claims the reason to place my DE license to practice law is based on my speech containing my religious-political beliefs contained in pleadings against former President

Donald J. Trump [Trump] to dissolve the establishment of government religion that created and continues to create a substantial burden upon my religious exercise by eliminating freedom to allow religious exercise to be bought and sold with government backing through a series of executive orders. I incorporate herein by reference the pleadings I filed in Kelly v. Trump at Third Circuit Docket Item ("3DI") 3DI21-4.

9. The US Supreme Court held in *Gentile v. State Bar of Nevada*, 501 U.S. 1030, 1054 (1991)

> "At the very least, our cases recognize that disciplinary rules governing the legal profession cannot punish activity protected by the First Amendment, and that First Amendment protection survives even when the attorney violates a disciplinary rule he swore to obey when admitted to the practice of law…..We have not in recent years accepted our colleagues' apparent theory that the practice of law brings with it comprehensive restrictions, or that we will defer to professional bodies when those restrictions impinge upon First Amendment freedoms."

10. Although the court noted lawyers may be regulated under less restrictive standards to protect speech, the Court has not addressed whether the State may be deem me disabled but for my exercise of 1st Amendment religious beliefs contained in my Religious Freedom Restoration Act petitions in Kelly v Trump.

11. The doctrine forbidding unbridled discretion is violated when the decision maker relies upon no more than his purely subjective ideas of public welfare, peace, safety, health, decency, good order, morals or ethics. See Shuttlesworth v. City of Birmingham, 394 U.S. 147 (1969). Moreover, the DE Disciplinary proceeding was brought to conceal State misconduct.

12. Chancery Court and DE Supreme Court agents and members sought to impede and obstruct my access to the Courts in *Kelly v Trump*. The First Amendment prohibits state officials from retaliating against Claimants, such as myself, for exercising their right of access to

the courts. “Retaliation by public officials against exercise of First Amendment rights is itself violation of the First Amendment.” US. Amend. 1. *Zilich v. Longo,* 34 F.3d 359 (6th Cir. 1994).

13. A representative of the Chancery Court staff misled me into almost missing my deadline to file a notice of Exception. The representatives at the Chancery Court demeaned me apparently based on poverty, association or religious beliefs. I petitioned Chancery Court Master Patricia Griffin for her help from disparate treatment. In addition, the Supreme Court through ODC impermissibly interfered with Kelly v Trump by contacting Judge Clark. (A-4, A-5).

14. In mid-April, Judge Clark appeared to threaten me at BJs, a store, located in Millsboro, Delaware, as if I was on trial for standing up for my faith in Jesus, solely based on my exercise of seeking relief in court based upon alleviating the government sponsored burden the establishment of government-religion Trump created upon my free exercise of religion. The ODC and Judge Clark clearly violated my right to access to the courts to defend my religious beliefs and exercise of belief, by seeking to use their government power to obstruct my case, showing partiality to the Defendant, the President of the United States. “Supreme Court's two-step Saucier analysis governs whether a government official is entitled to qualified immunity, considering: (1) whether the facts alleged by the plaintiff show the violation of a constitutional right, and (2) whether the right at issue was clearly established at the time of the alleged misconduct.” *Werkheiser v. Pocono Twp*., 780 F.3d 172 (3d Cir. 2015).

15. Judge Clark and the State knew or should have known that seeking to use the cloak of government authority, as a respected, fair judge, to chill or condemn or interfere with my ability to bring this case without government retaliation or pressure violates My 1st amendment right to petition, speech, religious belief, association, and exercise of belief. My right to a fair, unobstructed trial to alleviate a substantial burden upon my free exercise of

religion is a constitutional right. I was standing up for my personal freedom to worship Jesus according to the dictates of my conscience, even if no one else shares the same beliefs, without government persecution. I am permitted to believe differently than the government through its agents, even if what Jesus teaches seems foolish to the world. 1 *Corinthians* 1:18, 2:14-16. Id.

16. "Government official's conduct violates "clearly established" law, so that the official is not entitled to qualified immunity, when, at the time of the challenged conduct, the contours of a right are sufficiently clear that every reasonable official would have understood that what he is doing violates that right." Id. I desired fair access to the courts, without government persecution based on my exercise of redressing a grievance to alleviate the burden upon my free exercise of religion from Government sponsored religious persecution directly caused by government establishment of government-religion and government-religious views. I objected to disparate treatment based on religious affiliation, and reserved the issue for appeal on due process, first amendment and equal protection grounds in the civil rights case. Id.

17. During Kelly v Trump I received a threatening letter from DE-Lapp with information only the DE Supreme Court was privy to. (A-4, A-5) I later realized it was the DE Supreme Court who participated and caused the attacks. I received 2 more letters from DE-ODC, for a total of three threatening letters prior to my petition in Kelly v Trump was denied at USSC. I filed my civil rights law suit before the Delaware Disciplinary proceeding began. (A-5) After the civil case started, the USSC rejected my petition in Kelly v Trump. It was weeks later the Delaware Disciplinary proceeding initiated.

18. During the disciplinary case suit additional violations of my Constitutional rights, federal law and common law arose, compelling me to move more than thrice to amend my complaint with no grant. Per the attached Brief, Reargument and State reply, additional facts,

legal claims arose or were discovered since I initiated the civil rights case. Exhibit P-Q-R) I also attach other pleadings or motions for reagument showing additional facts and claims in the Civil-rights-case.

19. The Delaware Order placing my license on disability inactive caused reciprocal law suits including this reciprocating law suit brought by the District Court for the Eastern District Court of Pennsylvania where my license was placed as disbarred.

20. The disbarment below was based on Judge Diamond booby trapping me to get out of work required to correct the voluminous misfiled documents. (Ex-C) I have good cause to contest the order. I also have good cause to contest reciprocal discipline should this ultimately be remanded too. I assert my right to be afforded a fair and reasonable opportunity to be heard in my defense before this court may deprive me of property interest on my license based on the court's whims to reduce work-load and meet data. US Amend V.

21. A lawyer's right, my right to pursue my profession constitutes a property protected by the due process clause of the 5th applicable to the Federal government, and the 14th Amendment applicable to the state, and of which I cannot be deprived for any whimsical, capricious or unreasonable cause, including the state's disagreement with my religious-political beliefs.

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

23. The Disbarment judgment may start up to 6 additional law suits on the different order below, including by the US Supreme Court. Supreme Court rule 8 allows for disbarment and discipline proceedings, but is not required in disability.

24. Pursuant to US Amend V, I seek a reasonable, fair opportunity to petition this Court on the disbarment order below without the unfair threat of 6 additional lawsuits against me, which would vitiate my reasonable access to the courts to effectively exercise my 1st Amendment right to petition in this case simultaneously while fighting the civil-rights case on appeal, causing me to lose the civil rights asserted 1st Amendment right to religious belief, speech, exercise of belief, association, 6th Amendment right to self-representation, Constitutional arguments against disciplinary proceedings and rules including but not limited to Rules 7, 13, 14, other Constitutional liberties and claims, not by free choice, but government compelled choice, should this court not accommodate me by allowing a stay so as not to forever deprive me of my religious exercise of belief in Jesus without threat of punishment in DE. *Centifanti v. Nix*, 865 F.2d 1422 (3d Cir. 1989) ("**Suspended attorney who had been denied reinstatement to bar brought civil rights action against Chief Justice and Justices of Pennsylvania Supreme Court** alleging various **constitutional defects in procedural rules** under which Supreme Court considers petitions for reinstatement of suspended attorneys…..The Court of Appeals, Cowen, Circuit Judge, held that: (1) federal district court had subject-matter jurisdiction; (2) **district court abused its discretion in denying attorney's motion for leave to amend complaint**; (3) district court properly denied attorney's motion to compel discovery of privileged documents; and (4) attorney's complaint was not barred by state statute of limitations for **tort actions** or by principles of res judicata.") (emphasis intended).

25. I also require a stay to sustain my life and health. I asserted my right to live in all courts and have attached on the record health records and averred that I must assert my right to live under less strenuous circumstances because people have the sin against the holy spirit by the desire not to want to inconvenience there own for the few to sustain life and health. I have religious objections to healthcare and mental healthcare.

26. The Panel abused its discretion committing clear error of law, clear error of fact creating manifest injustice against me by denying a stay until the conclusion of the Civil-rights case until appeal to the US Supreme Court including potential remand back to the DE District Court has been concluded under the extraordinary circumstances of this case. A denial vitiates my ability to effectively exercise my 1st Amendment right to petition in the civil rights case on appeal and remand effectively vitiating my 1st Amendment right to religious belief, exercise of belief, speech, association, and other claims. A stay is required to prevent irreparable injury to me in terms of the loss of my freedom to exercise private 1st Amendment right to religious belief in Jesus Christ in DE, petition, speech, association, 6th Amendment right to self-defense, and licenses under the threat of not being able to buy and sell but for my religious beliefs the state finds repugnant.

27. The provisions of the First Amendment effectually guarantee the religious liberty of the individual against infringement by the state and federal government, or agencies of the state and federal government, including Boards and ODCs, and generally enjoin the employment of the organs of government for essentially religious purposes. The Due Process Clause of the Fourteenth Amendment to the Federal Constitution safeguards religious liberty from interference by a state and subdivisions thereof. The interference of the state in Kelly v Trump violates not only 42 USC 1985, witness tampering by firing two material witnesses, sealing A-4, and A-5 per

the attached per the email evidence attached hereto, but also violates my 1st Amendment rights to religious belief, speech, petition, association.

28. The DE Supreme court violated procedural due process by denying me an opportunity to be heard, not or protections under the rules. The State-Court appointed counsel despite my religious and 6th Amendment objection. The Court refused to give me court records where I am a party in the appointment under Number 541. I needed to know whether my right to be heard was vitiated, and whether my pleadings were filed or not prior to the appointment of counsel where I sought to prevent the appointment.

29. The fact the DE Supreme Clerk told me I had all the documents on the record does not show me whether my 14th Amendment procedural right to be heard by submitting all the documents was upheld or whether my 1st amendment right to petitions were denied as undocketed.

30. Despite my requests, the Court never provided me with pleadings in a case against me where they appointed counsel despite my objection before allowing me to self-represent. I had less than 2 weeks to attend a hearing after successfully firing counsel with no ruling on my motions for discovery until 2 days prior to the hearing. No 541 IMO Kelly.

31. I developed the shingles and the hearing was rescheduled for 8 days, not enough time to call witnesses, including Arline Simmons since the rules require two days. At the time of the hearing I did not know the Supreme Court sealed documents in my favor or fired two material witnesses one of whom I moved for allowance to call as witness. (See attached email)

32. The supreme court fired two court staff necessary witnesses to my defense in the ODC proceeding and sealed two documents in Kelly v Trump and incited attacks against me

during Kelly v Trump by sending Judge Clark to see me privately to compel me to withdraw my case, by having two state agencies send me threatening letters deeming my speech contained in my active case before the court, Kelly v trump. The state acted unconscionably and cold heartedly at the expense of my health to cover up its own blatant misconduct.

33. Should my appeal in the Civil-rights-case be granted and the case be remanded back to the Delaware District Court in Kelly v Swartz, Number 21-1490, the threat of 6 possible law suits create an obstacle so great as to prevent me a fair opportunity to petition in the Civil-rights case until the conclusion of the proceeding given the voluminous amount of Defendants, claims, poverty creating a substantial burden, health issues and other facts of this case. I ask for a fighting reasonable chance for the opportunity to defend my faith in Jesus Christ and other claims without government persecution. Even if this case merely remands this case back to Judge Diamond my ability to effectively and fairly exercise my right to petition in this case to prevent 6 needless additional cases and the civil rights case is diminished causing me to lose Constitutional protections in DE forever and licenses in multiple courts.

34. I seek to add Supreme Court justices to safeguard my religious belief in Jesus and other Constitutional rights and claims. The odds are already stacked against me. Please grant me a stay.

35. My right to petition to safeguard my fundamental rights and claims by petition of the original DE order before the USSC were previously denied by this court and Judge Phipps in particular in the Civil rights case by his denial of stay. A stay must be granted to give me a fighting chance to petition the civil rights case on appeal to the US Supreme Court, and hopefully back on remand before the DE District Court. I assert my right to effectively fight the Delaware Supreme Court members and other Defendants in the civil proceeding to defend not

merely my licenses but elimination of my 1st Amendment right to believe in Jesus Christ and other rights forever while shielding state persecution of me in vindictive retaliation for merely petitioning to assert my rights over a course of about 20 years that will continue should this court not uphold my asserted rights of Constitutional protections.

36. This judgment may start up to 6 additional law suits on the different order on disbarment, including by the US Supreme Court. Supreme Court rule 8 allows for disbarment and discipline proceedings, but is not required in disability.

37. Additional threats of possible law suits create an obstacle so great as to prevent me a fair opportunity to petition in the Civil-rights case until the conclusion of the proceeding given the voluminous amount of Defendants, poverty creating a substantial burden, health issues and other facts of this case. I ask for a fighting reasonable chance for the opportunity to defend my faith in Jesus Christ and other claims without government persecution. In addition the harm of disbarment is much more severe.

38. My license is on disbarred status. The Eastern District Court agreed not to share the status until conclusion of the case. There is no harm to this court or the public or anyone.

42. A stay is required to protect my meaningful access to the courts and to prevent irreparable injury loss of licenses I worked hard for in addition to loss of fundamental rights..

43. The additional law suits have increased costs, caused me to panic, lose sleep, and gain baby white hairs. If I expend all my resources in terms of time, paper and other costs, by defending all cases simultaneously only to run out of resources, I would be prevented from defending my exercise of fundamental rights in any case to its conclusion.

44. I am utterly poor. A stay is required to prevent a substantial burden and obstacle to my access to the Courts, and compelled violation of my religious belief against debt, in contravention to my First Amendment right to access to the Courts applicable to the Federal Courts via the Equal Protection component of the 5th Amendment, for me, a member of class of one due to religious beliefs against incurring debt combined and due to utter poverty. *See, Abdul-Akbar v. McKelvie*, 239 F.3d 307, 317 (3d Cir. 2001) ("This requires us first to determine whether Appellant is a member of a suspect class or whether a fundamental right is implicated. Neither prisoners nor indigents are suspect classes.") *Citing, e.g., Pryor v. Brennan,*914 F.2d 921, 923 (7th Cir. 1990); *Harris v. McRae*, 448 U.S. 297, 323, (1980) (noting that poverty is not a suspect classification); (*But see, Lewis v. Casey*, 518 U.S. 343, 370 (1996) "[A]t all stages of the proceedings the Due Process and Equal Protection Clauses protect [indigent persons] from invidious discriminations.")

45. Fundamental First Amendment rights of speech, belief, exercise of belief, and association are implicated, in this case. Thus, this Court must have a compelling reason to deny my request for a stay of the proceeding to prevent potentially irreparable to me, narrowly tailored to meet the important justification.

46. There is no compelling reason to deny my request for a stay. Defendants are not prejudiced, nor is the public or the Court. My license is on disbarred. Nor is any justification narrowly tailored to meet any compelling reason. This Court must grant a stay. This Court may stay the case, with no prejudice, while potentially avoiding needless work for the court, the appellate courts and parties by preventing 6 additional law suits.

47. However, I face an undue burden should this court deny my request for a stay of the proceeding. I risk loss of my First Amendment rights, civil rights claims, property interest in

my license, loss to my reputation, other damages, loss of employment opportunities and a substantial burden to my access to the courts. I also risk the real threat of additional law suits and loss of licenses should a stay be denied. . I am not able to effectively petition before this court as I defend my civil rights case without a stay. I also risk death. I lose 5 pounds of water weight and am very dehydrated and dizzy and feverish as I type this based on bad healthcare I received as a youth where I require time in order to sustain my health and not die for the convenience of the Court. I assert my religious exercise of to live for God not die for the vanities of people.

48 I must be afforded access to the courts to defend my license to practice law before the Eastern District Court of PA from being placed on disbarred and even inactive disabled but for my faith in Jesus Christ, and exercise of fundamental rights.

49. "This Court has discretion to stay a civil proceeding. While staying a case is an extraordinary measure courts will not hesitate to grant a stay when the interests of justice seem to require it." Sec. & Exch. Comm'n v. Hvizdzak Capital Mgmt., Civil Action 1:20-154, at *1-2 (W.D. Pa. Aug. 11, 2021). The interest justice requires it in my case so as not to vitiate my constitutional rights, not merely my licenses.

50. Staying this action could restructure the proceeding in this Court because collateral estoppel could prevent re-litigation of issues adjudicated in the civil rights proceeding upon remand and appeal. The Court has an interest in preventing needless case-loads before its own court, additional courts, including the USSC, even if this court remands the case back to the Eastern District Court of PA. Thus, the interests of the Court weigh in favor of a stay, to prevent needless waste of judicial resources, by a superseding or conflicting US Supreme Court decision.

51. I lack time and resources to fight both the appeal and the civil rights case and 6 other potential different reciprocal cases simultaneously.

52 In the interest of justice, this court must not sacrifice my meaningful opportunity to be heard in all cases by denying a stay. This court must preserve my right for a meaningful opportunity to be heard, without waste of judicial resources or prejudice towards me, by granting a stay.

53. I seek to void the Delaware Disciplinary decision in the civil rights case, in addition to other relief. Should the US Supreme Court rule in favor or against me it will likely affect the outcome of this Court's determination based on the same and similar facts.

54. Denial of a stay would cause a substantial burden upon my access to the courts due to my poverty, limited time, resources, and my religious beliefs against indebtedness. Should a stay be denied, I would be required to expend limited resources on all matters, only to risk run out of resources vitiating all my claims in the civil rights cases and defenses in reciprocal disciplinary cases. A denial of a stay would prevent me the ability to plead and defend my case in any matter. I beg you for a stay, to prevent potentially needless costs, and sacrifice of my First Amendment liberties and all of my licenses by the unreasonable whims of the court.

55. Please afford me the opportunity to plead my claims in this case, 30 days after I am afforded to assert my rights at the conclusion of the civil-rights case upon a final nonappealable decision.

Wherefore, I pray this court grants this motion.

Dated: July 11, 2023 Respectfully submitted,

/s/Meghan Kelly

Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939,
(302) 493-6693, meghankellyesq@yahoo.com,
No 4968, Inactive, pro se (4,722)

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: July 11, 2023

Meghan Kelly (printed)

Meghan Kelly (signed)

Exhibit A

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

CCO-081

No. 22-3372

IN RE: MEGHAN M. KELLY,
Appellant

(E.D. Pa. No. 2-22-mc-00045)

Present: SHWARTZ, MATEY and PHIPPS, Circuit Judges

1. Unopposed Motion by Appellant Meghan M. Kelly to Vacate order dated 05/19/2023;

2. Unopposed Motion by Appellant to Amend Correct Motion to Vacate to Include Pursuant to Fed. R. App. Proc R 27(b) and Rule 40;

3. Motion by Appellant to for Leave to Exceed Word Limit for Corrected Motion to Vacate Order dated May 19, 2023;

4. Motion by Appellant to Correct the Record, Specifically District Court Docket Item, DI 12 under Rule 10 (e)(2)(c) and Rule 27;

5. Motion by Appellant for Extension of Time to File Brief and Appendix for 120 Days to appeal the lower court's order placing license on disbarred as retired but for religious beliefs, religious political beliefs, and religious political speech contained in petitions;

6. Motion by Appellant Meghan M. Kelly to stay of this proceeding including briefing, with the allowance of 30 additional days, when the stay is lifted at the conclusion of case 21-3198.

Respectfully,
Clerk/pdb

ORDER

The motion to exceed word limit is **GRANTED**. The motion to correct the record is **DISMISSED**. All other foregoing motions are **DENIED**.

By the Court,

s/ Paul B. Matey
Circuit Judge

Dated: June 30, 2023
PDB/cc: Meghan M. Kelly, Esq.

Exhibit B

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

No. 22-3372

In re: Meghan Kelly

(U.S. District Court No.: 2-22-mc-00045)

ORDER

Pursuant to Fed. R. App. P. 3(a) and 3rd Cir. Misc. LAR 107.2(b), it is

ORDERED that the above-captioned case is hereby dismissed for failure to timely prosecute insofar as appellant failed to file a brief and appendix as directed. Appellant's brief and appendix was initially due to be filed on May 30, 2023. The deadline was extended until June 13, 2023. Appellant's motions for further extensions of time were denied by Court order entered this date June 30, 2023.

It is

FURTHER ORDERED that a certified copy of this order be issued in lieu of a formal mandate.

For the Court,

s/ Patricia S. Dodszuweit
Clerk

Dated: June 30, 2023
PDB/cc: Meghan M. Kelly, Esq.

A True Copy:

Patricia S. Dodszuweit, Clerk
Certified Order Issued in Lieu of Mandate

Exhibit C

(Motion to Reopen July 10, 2023 Third Circuit Docket Items (hereinafter "3DI") 3DI 53, 3DI 54, 3DI 55 in 22-3372 incorporated in full, attached in part)

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	§	APPEALS COURT
Respondent.	§	CASE NUMBER: 22:37372
v.	§	DISTRICT COURT
United States District Court,	§	Misc. No. 22-45
Eastern District of Pennsylvania	§	Judge, Paul S. Diamond,

Motion to Reopen Case to Consider pleadings filed July 4, 2023 and July 5, 2023, Motion to Reopen the case to excercise the 1st Amendment right to petition under FRAP 40 Motions for reargument on denied motions and another potential motion

I Meghan Kelly, Esq., pursuant to FRAP 2, 27, 40, my 5th Amendment right to a fair trial to defend and preserve my private exercise of 1st Amendment rights to petition, speech, religious belief, exercise, and association, objection to compelled servitude invoking the 13th or other applicable law move good cause to Reopen Case, closed on 6/30/23 to Consider pleadings filed 6/4/23 and 6/5/23 Motions for Reagument orders denied by this Court on 6/30/23, and permission to file a motion should my motion for reagument of the Order denying a stay be denied and potential permission if needed to request pursuant to 28 USC Section 2106 that my license be placed on disability in order not to have 6 new law suits against me with a guaranteed new one by the US Supreme Court under Supreme Court Rule 8, without prejudice to appeal Denial of the Stay and denial, and any other Order by this Court to prevent irreparable injury in terms of harm to health, loss of property interests, 6 new law suit, loss of licenses, and the right to exercise fundamental rights. I incorporate the entire District Court Docket below and the Third Circuit Court Record by reference to the document or Docket Item, and any exhibits hereto as if fully incorporated herein, and aver"

1. 6/30/23 this Court entered 7 judgments against me near closing time on the 4th of July holiday weekend in this matter and the Kelly v Swartz a Civil rights case 21-3198 (hereinafter referred to as "civil-rights"-case or "21-3198"). I had a horrible holiday weekend. I

called my parents about the order and they threatened to cut off my phone which they did before. I told them this judgment may start up to 6 additional law suits on the different disciplinary order. They reasonably are upset. The denial of a stay, and a denial of more time caused the Clerk to file an Order dismissing the case immediately for failure to prosecute. (Exhibits A, B).

2. The Dismissal-Order denied me fair and reasonable notice under the circumstances, where the Court through my case manager assured me I would be granted time in response to my timely filed motion for an extension, in violation of my right to a fair proceeding under US Amend. V. I was not granted time. (Exhibit C)

3. Dismissal was especially unfair since on 6/2/23, well in advance of the 6/13/23 due date, I filed a Motion for more time to file the brief under prejudice. The Clerk Ordered that I may not exceed 3-pages despite good cause and requirement for more time under my unique situations. The Order effectively chilled my ability to effectively refer to all the facts and case law necessary to defend my 5th Amendment right to a fair proceeding by the threat of the irreparable loss of my private right to religious belief, substantial burden to access to courts and involuntary servitude against my asserted invocation of the 13th Amendment in the attached Motion for reagument on this courts Denial of costs, fees or taxes with leave to reassert the Motion. I reassert the Motion now in full, attached in part, and incorporate my Motion for reargument to vacate an Order, dated 5/19/23 concerning the page-limit threatening Order compelling me to comply or risk violating my religious beliefs, Motion to correct Motion to vacate, and related documents in their entirety. (Exhibits D, E, F, G, H, I)

4. Moreover the order dismissing the case for failure to prosecute was filed the same time as the Order denying an extension and a stay vitiating my 1st Amendment right petition this courts denial of motions on reagument under FRAP 4 wherein I intend to file a motion for

reargument or rehearing to effectively assert my claims and Constitutional rights in the Civil rights case, while not vitiating my right to defend my liberties and licenses in this case. The 6/30/23 dismissal order also vitiated my right to petition under FRAP 40 on denial of the recusal of a stay of Phipps or Scirica here and of Judge Scirica in the civil-rights case. I incorporate herein by reference in full, attaching in part Exhibits J through O, including the Motion to expedite. I incorporate the motion for time Phipps granted, and two motions for a stay Phipps denied that effectively deprived me of my First Amendment right to petition the DE Disciplinary appeal on US Supreme Court. I require a stay to safeguard my right my 1st Amendment rights to private petition, religious belief, exercise of belief, association and other rights and claims that I may lose forever in DE with no recourse for my claims other than the DE District Court.

5. My petition of the DE-Order to the USSC was denied on my first attempt since I filed the Motion for leave for additional pages prior to the petition instead of simultaneously therewith. (Exhibit P, letter denying petition, stamped first page showing receipt). In the civil-rights case, Phipps denied a stay, and an interim stay pending the US Supreme Court's determination on whether he erred in denying a stay as causing me irreparable injury in terms of loss of the 1st Amendment right to petition the DE-Order with the same brief within the time frame the Court gave me to make a second attempt of the exact same Brief. (3DI 49-51). Phipps denial of a stay did deny me my asserted 1st Amendment right to petition, causing irreparable injury unless I am permitted meaningful access to the DE District Court case to seek relief even on appeal and hopefully on remand.

6. I sought in good faith to maintain my right to petition in the US Supreme Court before the passage of time made it an impossibility. I filed a motion to expedite my petition prior to judgment of the civil rights case with the highest-court. Docketing delays prevented me

the 5th Amendment opportunity to be heard until it was too late. I was deprived of right to petition the DE-state Order and fairly present my claims before the USSC. (See, 3DI 49-50-51-52, Exhibit P, Docket sheet for Civil rights interim appeal).

7. My right to petition to safeguard my fundamental rights and claims was previously denied by this court and Judge Phipps in particular in the civil-rights case. I seek to file a motion for reargument in this case on denial of a stay to prevent additional irreparable injury in terms of loss of fundamental right to petition to sustain my Constitutional claims and liberties and other relief.

8. I seek permission to argue under FRAP 40 a stay must be granted to give me a fighting chance to petition the civil rights case on appeal to the US Supreme Court, and hopefully back on remand before the DE District Court. I have to safeguard my ability to effectively fight the Delaware Supreme Court members and other Defendants in the civil proceeding to defend not merely my licenses but elimination of my 1st Amendment right to believe in Jesus Christ and other rights forever while shielding state persecution of me in vindictive retaliation for merely petitioning to assert my rights over a course of about 20 years that will continue should this court not uphold my asserted rights of Constitutional protections.

9. I invoke and do not waive my 1st Amendment right to petition under rule 40 to assert and defend my right to private-constitutional rights, not merely my licenses especially my right to petition the state to safeguard my religious belief in Jesus without persecution, as the state has persecuted me for about 20 years.

10. Third Circuit-staff sought to persuade me to file a brief as I asserted in the attached letter. (Exhibit Q) I cannot or I will no longer be free to worship Jesus Christ, exercise

my religious-political beliefs, speak, associate, petition, self-represent, and the state-court may eliminate the religious freedoms of others in addition to me by labeling my religious-belief in Jesus a mental disability, unrestrained by the Constitutional limits to prevent me and other individuals the license to buy and sell, not only through professional boards but through the new economic digital slave system if this Court does not safeguard our liberties. US Amend I, V, VI, XIV.

11. For good cause to prevent manifest injustice against me in terms of the irreparable loss of the First Amendment right to petition under Rule 40 on the 6/20/23 and 6/30/23 denials of motions. I especially seek to reopen the case to present a motion for reargument on this court's denial of a stay to prevent manifest injustice against me under the extraordinary circumstances where a stay is required to prevent irreparable injury in terms of losing my Constitutional protected freedoms in DE forever.

12. I also seek to reopen the case for permission potentially to draft an additional motion to place my license on inactive disabled in order not to vitiate my right to sustain, assert and defend religious belief, speech, association, exercise of belief, petition, right to self-representation and other rights in the civil-rights case, should this court deny me a stay on a motion for reagument or other motions including motion for reargument on the recusal of Phipps and Scirica.

13. A DE Disciplinary order placing my license on disability and activity related thereto caused 6 additional law suits to arise, including the reciprocal proceeding which is the subject of this appeal, Eastern District Court of PA and including the civil rights case, which this court dismissed simultaneously with this case on 6/20/23.

14. The Eastern District Court's Order is different from disability in that it is disbarment. This judgment may start up to 6 additional law suits on the different order on disbarment, including by the US Supreme Court. Supreme Court rule 8 allows for disbarment and discipline proceedings, but is not required in disability.

15. Additional threats of possible law suits create an obstacle so great as to prevent me a fair opportunity to petition in the Civil-rights case until the conclusion of the proceeding given the voluminous amount of Defendants, poverty creating a substantial burden, health issues and other facts of this case. I ask for a fighting reasonable chance for the opportunity to defend my faith in Jesus Christ and other claims without government persecution.

16. The court of appeals has power to reopen a case to potentially recall and amend its mandate to protect integrity of its own processes and to avoid. See, P*erkins v. Standard Oil Co. of California,* C.A.9 (Or.) 1973, 487 F.2d 672.

17. This Court must allow me the First Amendment right to petition this court to prevent manifest injustice against me under the extraordinary circumstances to prevent irreparable injury to me in terms of the loss of my freedom to exercise private 1st Amendment right to religious belief in Jesus Christ in DE, petition, speech, association, 6th Amendment right to self-defense, under the threat of not being able to buy and sell but for my religious beliefs the state finds repugnant.

18. This is especially necessary since the Eastern District Court appeared to set me up in bad faith to get out of reading voluminous materials relating to about 20 years of the State of Delawares retaliation of my 1st Amendment right to petition and its compelled force that I violate my faith in Jesus for its convenience by disregarding my requests for accommodations or

petitions. The Eastern District Court's Order placed my license on disbarred as opposed to disabled by trickery, which will cause additional law suits that will prevent me from asserting my Constitutional rights to religious belief and other rights in

19. Judge Diamond of Eastern District Court of PA appeared to trick me into disbarment to get out correcting the misfiled documents in my case, which included another pro se petitioner's health record. (Exhibit U and V)

20. Judge Diamond of the Eastern District Court of PA knew I have been retired from PA since 2018. That was confirmable public knowledge at the time of the Order. Moreover the District Court cited the public state web site. (District Court Docket Item hereinafter "DI") DI 21. Judge Diamond also knew due to lack of time, poverty and limited means of transportation I could not easily research. I still am prejudiced due to lack of time and resources to research. I cannot afford to pay for Westlaw or Lexis, and I cannot afford to drive to the law library often. I must make my trips count. The trips have been few since I cannot afford gas for many trips.

21. Despite that Judge Diamond ordered me to draft a memorandum of law as to why my retirement in PA would not retire my license in its Court. DI-21. The Court booby trapped me based on an error of fact, an error of law creating manifest injustice against me by using retirement as a reason to disbar me. In response to the Order for a memorandum, while acting under great duress, I fell into the misleading trap of the Court. I filed a letter asking to be placed on retirement, as not admitted in the Eastern District Court of PA District Court to practice because I was confused as to whether I was retired or not. I thought my assumption of retirement might be wrong, but then the Court asked why I should not be retired. DI-22.

22. To my horror, the Court disbarred me instead of placing me on retirement. DI-23. I was surprised because I thought I would be retired.

23. I immediately called the case manager noting my confusion. I asked if this was punishment. I exclaimed my confusion as I thought I would be placed on retirement. She responded no, it was merely placing my license as disbarred due to retirement, not punishment. Gail Olsen said the Court was not disciplining me, per the letter confirming our conversation at DI-24. The case manager knew I was stressed about subpoenaing two terminated Court and other witnesses before it. I care about the two DE staff fired to conceal their evidence in my favor in litigation.

24. Having multiple law suits where Courts sought to discipline me for my faith in Jesus, I drafted a letter confirming our conversation, but remained confused. DI- 24.

25. At the time, just like now, I was under water in other cases with limited capacity to research. After researching I discovered I was not automatically retired since disbarred PA attorneys are not automatically disbarred and may have an office to practice before the Federal courts. *See, Theard v. United States*, 354 U.S. 278, 282 (1957); *Selling v. Radford*, 243 U.S. 46, 49 (1917), *Frazier v. Heebe*, 482 U.S. 641, 648 n.7 (1987); *also see, In re Surrick*, 338 F.3d 224, 231 (3d Cir. 2003), (disbarment by the [s]tate does not result in automatic disbarment by the federal court." *In re Ruffalo*, 390 U.S. 544, 547, 88 S.Ct. 1222, 20 L.Ed.2d 117 (1968)).

26. Judge Diamond booby trapped me by creating the assumption I was retired by asking me to draft a memorandum on why I should not be retired in its court too. I have limited time, resources and ability to research. The Court should not have placed me as disbarred instead of as retired. Moreover it is clear error of law, of fact creating manifest injustice against

me to place me on retirement too, even if the order should be changed. I did not have notice of disbarment, and the Court had reason to believe I did not understand the consequences of retirement. The Court knew I was confused and exploited that confusion to get out of analyzing the voluminous amount of Constitutional issues in the underlying original disciplinary case the reciprocal case is based on. The Orders below violate my 5th Amendment right to notice, and a fair proceeding.

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

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

29. While, I do not have easy access to resources, the Judge Diamond should have known retirement in state does not automatically retire my federal license unless specifically drafted in its rules. The rules do not require reciprocal retirement in my case. So, the District Court appears to have set me up to fall which is not fair or just. I gave the court notice I lacked

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

30. I did not have the means to research until later. I discovered and realized I must appeal the Eastern District of PA Order or potentially face 6 new law suits. That is important to prevent in order that I may defend my faith in Jesus in the civil rights case.

31. I require an opportunity to file a motion for reagument on denial of a stay to reassert I require a stay to do a good job on this appeal, to prevent 6 new lawsuits, and most importantly to assert my rights without government compelled waiver under forced not free choice in the civil-rights case. It is in the interest of the courts and the public to allow me an opportunity to petition for relief. I do not think this court or other courts desire to waste judicial resources by additional needless cases. I face the irreparable injury in terms of loss of health, life, constitutional liberties and eternal life. This court is apprised of my eye injury and my assertion of time to care for my health. The floaters have noticeably increased due to dehydration. I require opportunity to reargue for time to sustain my life and health too.

32. I have a good argument to overturn the Eastern District of PA's District Court's Order since I was retired from PA since 2018, and thought I was retired from that District Court.

33. I respectfully require leave by reopening the case to make reargurments on denial of time or a stay in order to make arguments why the Court order disbarring me must be overturned with leave to make smaller arguments to appeal which I do not discuss herein, but the

most important matter is to prevent 6 additional law suits by appealing the Eastern District Court's Order disbarring me as retired.

34. I am prejudiced by even appealing the Disbarment order before the US Supreme Court as a required self-incrimination necessary for me to exercise my right to petition. The Eastern District of PA agreed not to report discipline until conclusion of this matter.

35. The US Supreme Court may sue me as a result of the dismissal order placing my license to practice law in the Eastern District of PA as disbarred. Supreme Court rule 8 allows for disbarment and discipline proceedings, but is not required in disability. Delaware ODC and PA ODC would likely seek to try to sue me through disciplinary proceedings into oblivion while eliminating my Constitutional rights and protections under statutes, demeaning my reputation in vindictive retaliation for petitioning the Court to correct its own violations of procedural due process, and to punish me for the exercise of my 1st Amendment asserted right to religious belief, religious exercise, petition, speech, association, 6th Amendment violations or other exercise of rights in defense of my life, liberty, licenses and other claims.

36. On 6/8/23, I filed a Motion to recuse Four Judges, Judge Hardiman, Judge Phipps, Judge Honorable Montgomery-Reeves, and Judge Scirica. (3DI-43) I incorporate herein by reference.

45. On 6/9/23 I filed motion for a caveat to her Motion for this Court to recuse Judge Scirica, wherein I moved Judge Scirica for "for judicial consideration of drafting laws to prevent non-lawyers and non-judges from practicing law or taking the place of people judges without government authority."

46. I at all times intended to file a Motion for reargument under FRAP R 40.

47. To my horror, on 6/30/23, Judge Phipps participated in 5 judgments against my motions, including my motion for more time and a stay at Third Docket Item Number ("3DI") 3DI-47

48. My motion to recuse Judge Phipps and Judge Scirca was denied on 6/30/23.

49. I invoke my 1st Amendment right to petition to safeguard not only my interests in my licenses but to safeguard my 1st Amendment rights to private 1. Petition, 2. Speech, 3. Association, 3. Religious belief, 4, exercise of religious belief, 5. association, and related claims that will be diminished should a stay or other motions for reagument be denied.

50. 6/4/23 I filed the following documents that I incorporate in their entirety, including exhibits, although not attached hereto as Exhibits F-0:

1. Appellant Meghan Kelly's motion for reconsideration of Order Dated June 20, 2023 denying the recusal of Judge Phipps and Judge Scirica and Pursuant to FRAP Rule 2 for a new panel to re-consider motions denied by this Court on June 30, 2023
2. Petitioner Meghan Kelly Affidavit in Support of Recusal of Judge Phipps, and Judge Scirica
3. Appellant Respondent Meghan Kelly's Motion for leave to exceed the word and page limit in her motion for reconsideration of Order Dated June 20, 2023 denying the recusal of Judge Phipps and Judge Scirica and Pursuant to FRAP Rule 2 for a new panel to re-consider motions denied by this Court on June 30, 2023

51. 6/5/23, I filed Motion to Expedite Consideration of Appellant Meghan Kelly's motion for reconsideration of Order Dated June 20, 2023 denying the recusal of Judge Phipps and Judge Scirica and Pursuant to FRAP Rule 2 for a new panel to re-consider motions denied by this Court on June 30, 2023. (Exhibits F-0)

52. I adhered to the 14 day rule limit under FRAP 40. Federal Rule of Appellate Procedure 40 affords me a right to file a Motion for reargument on each of the 5 Orders denied, which is due by or before July 14, 2023. I also seek leave to reopen to consider another potential motion, as last recourse in order to prevent 6 new law suits, with at least 1 certain one which

would create an obstacle so great as to deny me reasonable or fair opportunity to effectively petition to defend my claims in the civil rights case Kelly v Swartz.

53. This appeal relates to the disbarment of my license based on the Eastern District Court's booby trapping me in bad faith based on its knowledge I believed I was retired in their court since I was retired in PA since 2018. I was incorrect.

54. The Court used the fact I was distraught about calling witnesses in a disciplinary proceeding. The Court tricked me to get out of correcting a voluminous amounts of misfiled documents where another pro se claimants' health record was placed on my pleadings. Two pleadings were contained in one. Documents were missing, out of order making it hard for me and the court to refer to some documents, and impossibility to see the missing ones. See Exhibits T and U. The order under the extraordinary circumstances is unfair

55. I request permission to reague a stay is required by reopening this case. I cannot defend this case simultaneously with the civil rights case, and up to potentially six new additional cases on a different order. I need a stay. Denial of allowing me to even present motions of reagument I intend to file will effectively vitiate my private 1st Amendment rights and other rights and claims in DE. I must seek to assert my right to reargue for a stay or time and not waive. There is no necessary purpose narrowly tailored to the Court or the public's interest in denying me the asserted not waived right to petition to defend and not lose my First Amendment rights. There is no harm to the public or the court. My license is currently disbarred, but I face the loss of my private-First Amendment rights, 6th Amendment rights and Delaware District Court claims based on the governments' forced not free choice should this court deny my petition.

56. The judgment may start up to 6 additional law suits on the different order on disbarment, including by the US Supreme Court. Supreme Court rule 8 allows for disbarment and discipline proceedings, but is not required in disability.

57. Additional threats of possible law suits create an obstacle so great as to prevent me a fair opportunity to petition in the Civil-rights case until the conclusion of the proceeding given the voluminous amount of Defendants, poverty creating a substantial burden, health issues and other facts of this case. I ask for leave to petition for a fighting reasonable chance for the opportunity to defend my faith in Jesus Christ and other claims without government persecution.

58. My license is on disbarred status. The Eastern District Court agreed not to share the status until conclusion of the case. There is no harm to this court or the public or anyone by denying a stay unless this court desires to fix the proceeding in the civil rights case based on personal disdain for m political-religious petitions which may be the case since it appears this Court desired to increase burdens by rendering orders against me simultaneously in the two cases.

59. From the record it appears this Court, the District below and the DE-State court threatened punishment in retaliation for petitioning the Court its own correct perceived mistakes or misconduct, which impeded my exercise of the right to petition to defend my claims and constitutional rights effectively. (Exhibit Q, R, S, T, U) This Court misfiled my civil rights documents by including prejudicial information despite the fact I gave the court prior notice the documents related of the DE Order and my reciprocal notice documents. This Court threatened sanctions as I desperately fought against prejudice in defense in my belief in Jesus when this Court placed the disciplinary opinion and documents on the record despite my notice, call and email giving the Court a head's up that the mailed in documents is required under the rules for

me to present for a reciprocal case, arguably in violation of my 5th. I incorporate pleadings to remove the record attached hereto Exhibits Q, R, S, T. I seek to protect the court, even when I file petitions to correct the court.

60. This Court may reopen its mandate to prevent injustice. *Gradsky v. U.S.*, C.A.5 (Fla.) 1967, 376 F.2d 993 , certiorari denied. Manifest injustice will occur should this court reject my plea in that I will not be able to freely worship Jesus without fear of government reprisal, in addition to not being able to buy and sell as a lawyer but for my religious beliefs.

61. The State claims a reason my DE license to practice law on disability inactive is based on my speech containing my religious-political beliefs contained in pleadings against former President Donald J. Trump [Trump] to dissolve the establishment of government religion that created and continues to create a substantial burden upon my religious exercise by eliminating freedom to allow religious exercise to be bought and sold with government backing through a series of executive orders and activity I describe and incorporate herein by reference the pleadings I filed in Kelly v. Trump at (Third Circuit Docket Item hereinafter"3DI") 3DI21-4.

62. The US Supreme Court held in Gentile v. State Bar of Nevada, 501 U.S. 1030, 1054 (1991):

> "At the very least, our cases recognize that disciplinary rules governing the legal profession cannot punish activity protected by the First Amendment, and that First Amendment protection survives even when the attorney violates a disciplinary rule he swore to obey when admitted to the practice of law…..We have not in recent years accepted our colleagues' apparent theory that the practice of law brings with it comprehensive restrictions, or that we will defer to professional bodies when those restrictions impinge upon First Amendment freedoms."

63. This presents a unique important question as to whether I, an attorney may be disciplined for my exercise of the First Amendment right to religious beliefs contained in my state petitions. And, whether my religious belief in Jesus as God not money as God may be

labeled a disability to prevent me from buying and selling as a lawyer but for my religious belief.

Matthew 6:24

Wherefore I pray this Court grants this motion.

Respectfully submitted,

Dated July 10, 2023

/s/Meghan Kelly
Meghan Kelly, Esquire
DE Bar Number 4968
Inactive license
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
PRO SE (4,976 words)

Exhibit D

(Initial Complaint though I moved multiple times to amend to include new and additional claims, parties and t shorten it, not included herein 21-1490 District Court Case 21-1490)

UNITED STATES DISTRICT COURT IN THE DISTRICT OF DELAWARE

Meghan Kelly	)	Civil Action No.:
Plaintiff,	)	
v.	)	
Disciplinary Counsel Patricia B. Swartz, Chief Disciplinary Counsel David A. White, Disciplinary Counsel Kathleen M. Vavala, Office of Disciplinary Counsel, Board of Professional Responsibility for the Supreme Court of Delaware, the Preliminary Investigatory Committee, and Delaware Attorney General, Kathleen Jennings, in her capacity as Delaware Attorney General	)	
Defendants.	)	

MEGHAN KELLY

V.

DISCIPLINARY COUNSEL PATRICIA BARTLEY SWARTZ, CHIEF DISCIPLINARY COUNSEL DAVID A. WHITE, DISCIPLINARY COUNSEL KATHLEEN M. VAVALA, OFFICE OF DISCIPLINARY COUNSEL, THE BORD OF PROFESSIONAL RESPONSIBILITY FOR THE SUPREME COURT OF DELAWARE, THE PRELIMINARY INVESTIGATORY COMMITTEE, AND DELAWARE ATTORNEY GENERAL, KATHLEEN JENNINGS, IN HER CAPACITY AS DELAWARE ATTORNEY GENERAL

Meghan Kelly, by and through her own pr se representation, brings this Verified Complaint pursuant to 42 USC Section 1983, 42 USC Section 1985, Federal Rules of Civil Procedure, Rule 65, the First Amendment of the US Constitution, and the Fourteenth Amendment of the US Constitution, and contemporaneously therewith, Pro se *Plaintiff's Motion to file in forma Pauperis, Plaintiff Meghan Kelly's Motion for permission to E-file through*

public access to court electronic records (PACER); exemption of PACER fees, and a waiver of the additional paper copy requirement for electronically filed pleadings, Plaintiff Meghan Kelly's Motion for remote proceedings or to appear remotely, Plaintiff's Motion for a Temporary Restraining Order and exemption of bond, Plaintiff's Memorandum of Law in support of her Motion for a temporary restraining order and exemption of bond, Plaintiff's motion for a preliminary order and exemption of bond, Plaintiff's Motion to Expedite, Plaintiff's Memorandum of law in support of Plaintiff's motion for a preliminary injunction and exemption from bond, and motion to expedite, against Defendants Disciplinary Counsel Patricia B. Swartz, Chief Disciplinary Counsel, David A. White, Disciplinary, Counsel Kathleen M. Vavala, the Office of Disciplinary Counsel, Board of Professional Responsibility for the Supreme Court of Delaware, the Preliminary Investigatory Committee, and Delaware Attorney General Kathleen Jennings, in her capacity as the Attorney General for the State of Delaware (collectively, "defendants"), and states as follows:

THE PARTIES

1. Pro se, unrepresented Plaintiff, party, not acting as an attorney advocate, Meghan Kelly (also referred herein as, "Meghan," "Plaintiff," "I," or "me," or "my" or "myself" also "she" and "her" and "Plaintiff") am an adult resident of the state of Delaware, residing at 34012 Shawnee Drive, Dagsboro, DE 19939.

2. Defendant Disciplinary Counsel Patricia B. Swartz ("Patricia," and individually and collectively with one or the more Disciplinary counsel or their agent, Disciplinary Counsel Kathleen M. Vavala, and Chief Disciplinary Counsel David White referred to as "ODC"), is a Delaware resident. Her place of business as Disciplinary Counsel is located at the Office of

Disciplinary Counsel, The Renaissance Centre, 405 N. King Street, Suite 420, Wilmington, DE 19801. She may be served at her place of business.

3. Defendant Disciplinary Counsel Kathleen M. Vavala, ("ODC") is a Delaware resident. Her place of business is located at the Office of Disciplinary Counsel, The Renaissance Centre, 405 N. King Street, Suite 420, Wilmington, DE 19801. She may be served at her place of business.

4. Defendant Chief Disciplinary Counsel David White, (ODC"), is a Delaware resident. David White is the His place of business is located at the Office of Disciplinary Counsel, The Renaissance Centre, 405 N. King Street, Suite 420, Wilmington, DE 19801. He may be served at her place of business.

5. The Office of Disciplinary Counsel ("ODC" individually and collectively with the above referenced Defendants) is a Delaware organization so tied to the state of Delaware. It is considered an arm of the court, and a state agency whose place of business is at The Renaissance Centre, 405 North King Street, Suite 420, Wilmington, Delaware 19801.

6. Board of Professional Responsibility for the Supreme Court of Delaware ("PR") is an organization tied to the state of Delaware. It is considered an arm of the court, and a state agency who may be served at The Renaissance Centre, 405 North King Street, Suite 507, Wilmington, Delaware 19801.

7. Preliminary Investigatory Committee ("PI") is an organization tied to the state of Delaware. It is considered an arm of the court, and a state agency who may be reached care of the ODC at The Renaissance Centre, 405 North King Street, Suite 420, Wilmington, Delaware 19801 (Individually and collectively, the ODC, PR, and PI may also be referred to herein as Defendants or Defendant).

8. Defendant Delaware Attorney General Kathleen Jennings, in her capacity as the Attorney General for the State of Delaware, whose place of business is located at Delaware Department of Justice, Carvel State Building 820 N. French St., Wilmington, DE 19801. She may be served at Delaware Department of Justice, Carvel State Building 820 N. French St., Wilmington, DE 19801.

JURISDICTION

9. Under 28 U.S. Code § 1331 & 1343, this Court has subject matter jurisdiction because this action arises under the Constitution and laws of the United States relating to civil rights.

10. Venue is proper because a substantial part of the events giving rise to the claims occurred in this district, all of the Defendants are residents of Delaware in which the district is located and Defendants are Delaware entities or Delaware residents, performing business in the State of Delaware.

11. Defendants regularly conduct government business in this state of Delaware.

12. My claims against Defendants arise from Defendants' acting under the color of government authority in the state of Delaware, specifically “under color of statute, ordinance, regulation, custom, or usage, of [the] State [of Delaware subjecting me, or causing me to be subjected] to the deprivation of “rights, privileges, or immunities secured by the Constitution and laws” including my First Amendment rights, and my license to practice law, in violation of 42 U.S.C. § 1983, and in retaliation for my First Amendment exercise applicable to the Defendants pursuant to the Fourteenth Amendment right to petition the Chancery Court and United States Supreme Court to seek protection for the exercise of my fundamental right to exercise speech, religious belief, association, and the right to petition, and separately the right to petition, as an

impoverished citizen of the United States with limited resources to plead my case, as a party with an active license to practice law defending my personal liberties, as an unrepresented party, not acting as an attorney advocate on behalf of another, as a Christian with personal religious beliefs, as a Christian-democrat, as a Catholic, as a Democrat, as a citizen with unique personal beliefs that do not conform to the world's trained, conditioned, compelled beliefs.

13. The conduct in issue arises in Delaware.

FACTS

BACKFROUND, HARM TO MEGHAN KELLY

14. I brought this law suit pursuant to 42 USCS § 1983, and 42 USCS § 1985 to enjoin proceedings brought by the Defendants to place my attorney license on inactive disabled in violation of the First Amendment Applicable to the Defendants pursuant to the Fourteenth Amendment in retaliation of my exercise of my fundament right to petition, speak, freely exercise my religious beliefs and association, for malicious purposes based on harming my reputation, to make my speech chilled in the public's views, to harm my character, and to suppress, interfere, obstruct, impede my exercise of religion, speech, association, and right to petition, as a party, and to conceal misconduct within the Court system in my case, or to seek to protect the Court's reputation at the cost of eliminating my individual liberties, and in conspiracy to interfere, impede, or obstruct my separate lawsuit, *Kelly v Trump*.

15. This United States District Court case arises upon actions by state government agents taken, under the color of state authority and color of law, statute or regulation, to retaliate, and to unlawfully pressure Plaintiff to forgo her case, or to impede or obstruct my access to the courts in a civil rights lawsuit, *Kelly v Trump*, Case Number 21, 5522 in the US Supreme Court, Case Number 119, 2021 before the Delaware Supreme Court, and Case Number 2020-0809 before

the Chancery Court for the state of Delaware (referred herein as "*Kelly v Trump*"), where I am seeking relief to protect my free exercise of religion, speech and association without government sponsored economic, social or physical persecution, substantially burdening such exercise. Attached, please find documents I filed with the United States Supreme Court, Case Number 21-5522, as US Exhibit, to be incorporated herein in toto pursuant to the Federal Rules of Civil Procedure, Rule 10 (c), and referred herein as "US Ex" with reference to documents herein, identified by the marked exhibit letter or number therein with the term ("US Ex"), and the named Exhibit therein. Also attached, please find the Exhibit labeled "Us Exhibit Appendix Table of Contents," which outlines each of the exhibits in US Exhibit.

16. I brought this law suit to enjoin proceedings brought by Defendants' Conspiracy to interfere with a party, me, and my civil rights pursuant to 42 U.S.C. § 1985 (2)(b), where Defendants seek to place my attorney license on inactive disabled, to obstruct justice in *Kelly v Trump* and to punish me, impede my case from going forward or to suppress or discredit my religious beliefs, speech, prevent my continued petition before the Chancery Court and, or the United States Supreme Court, and to seek relief from the Defendants' interreference of my exercise of my First Amendment rights, including the my right to seek the protection of the court by petitioning the court for relief, my exercise of speech, religious beliefs and association (individually and collectively, these four rights also referred herein as "civil rights,") in violation of the First Amendment applicable to the Defendants pursuant to the Fourteenth Amendment, and to prevent punishment from the Defendants for the exercise of my speech, religion, and association which Defendants seek to suppress or discredit by disparaging me as "inactive disabled" in an official proceeding, *Kelly v Trump*.

17. The Defendants, interfered with, impeded, obstructed my access to the courts and

threatened to seek to take away my active license to practice law by seeking to place me on inactive disabled status, harm my reputation, my ability to work as an attorney, but for my law suit to protect my free exercise of religion, association and speech, in an attempt to impede an active law suit, initiated in the Chancery Court that is being considered before the United States Supreme court, based on my exercise of a right to petition as a party, not acting as an attorney, in which I seek to relief from a substantial government burden upon my religious exercise under *Religious Freedom Restoration Act*, 42 USCS § 2000bb (1-4).

18. I brought this law suit to enjoin proceedings brought by Defendants seek to place my active license to practice law, in inactive disabled, in a conspiracy to obstruct, impede, harass, and interfere with my exercise of civil rights in violation of 42 U.S.C. § 1985 (2)(b).

19. Defendants in violation of 42 U.S.C. § 1985 (2)(b), with two or more persons, including but not limited to Defendants, ODC, Patricia, Judge Kenneth Clark, and DE-Lapp employee, Carol Waldhauser ("Carol") and Eleanor Kiese ("Kiese"), Delaware agents, or arms conspired unlawfully to pressure Plaintiff to forgo her case to protect her free exercise of religion, or to obstruct, deter, by force of government authority, intimidate, impede and threaten, a party, me, Meghan Kelly in the Chancery Court, and, also in the United States Supreme Court case *Kelly v Trump*, from attending such courts, of from "testifying to any matter pending therein, freely, fully, and truthfully, or to injure such party … in (her) person or property."

20. Defendants seek to injure me in my person or property by 1. seeking to disparage my reputation and credibility as labeling me "disabled."

21. Defendants seek to injure me in my person or property by 2. initiating investigations and proceedings to place me on inactive disabled status on my active fully paid license to practice law, seeking to take away my property interest in my active license to practice

law, and preventing my ability to seek a job as an attorney or in any other field with such a defamatory label, thereby potentially committing me to a life of poverty without the prospects of finding a job.

22. Defendants seek to injure me in my person or property by 3. impeding, interfering, harassing, obstructing, threatening me by investigations, which I believe are never to help the one investigated despite DE-Lapp's letter, during an ongoing proceeding, *Kelly v Trump*, in violation of my right to petition, with intent to impede my petition for relief in *Kelly v Trump*, or in reckless disregard that a reasonable person would be deterred from continuing her case under the facts.

23. Defendants seek to injure me in my person or property by 4. intentionally or recklessly causing emotional distress manifesting in physical symptoms for the exercise of my First Amendment rights to petition, speech, exercise religion, and association, in violation of those rights.

24. Defendants injure me in my person or property by 5. placing me in potential danger. I sought relief from the Chancery Court because I feared physical violence against my person. Someone talked about shooting me as I indicated in my brief for the Delaware Supreme Court for my mere stickers on my car exhibited speech "Impeach No one is above the law! No One is Below the Law," and "Impeach Serve your country not your seat." US Ex- Appendix E.

25. Someone threw a white thick substance at car in Millsboro, apparently to show their disdain to my speech, my stickers. I took my stickers off. Since so many people gave me the middle finger, and I did not want harm to come to me or my property based on my speech. District Court Exhibit 1.

26. I live in Sussex County, Delaware, an area full of Trump supporters and republicans, where democrats, like me are not popular.

27. A few people have called me, a democrat, a "demon-crat," making jokes that are not funny. If they go beyond a joke, it is no laughing matter. There have been attacks against fellow Americans based on party orientation have gone beyond jokes in recent years. See US Ex-Ex 23, relating to 54 cases invoking former President Trump in cases in connection to threats or violence. See US Ex-Ex 24 relating to former President Trump encouraging the militarization of police arguably to combat citizens who exercise their freedom to associate to speak to protest his government policies. See, US Ex-Ex 25, where former President Trump manufactures the threat that protestors exercising their freedom of speech and association will loot. Thereby, Trump, a government agent, encourages or incites private people to shoot or attack protestors to defend property against false threats, chilling the protestors freedom to associate and speak by government incited private attacks, and militarization by police to use violence against individuals who pose no risk of looting. Also see, US Ex-Ex 10 relating to Trump insulting people of the Jewish faith for not supporting Trump. Also see US Ex-Ex See, US Ex-Ex 11 relating to Trump's call for discrimination against Muslims.

28. The government through some, not all agents, incited private violent, economic or social persecution toward fellow Americans based on political or political-religious association should not be permitted, despite the long history of social persecution based on government party.

29. The government through some not all agents, model wicked behavior inciting a segment of the population to use violence or threat of violence against fellow Americans, by personal insults, dehumanizing people based on party, religion or association and appealing to false threats, fears, and emotions, not leadership through love and concern for the people they serve regardless of party, race, religion or place of association.

30. This name calling by private parties, "demoncrats" is protected speech. Private

people are allowed to call me demoncrat, a religious-political word. But I believe such religious, political dehumanizing name calling stems from the unlawful establishment of government-religion, government-party-religion or government-official-religion by government agents, government officials or government partners who take money or barter favors from the government for a shared purpose, including churches, who should be considered government agents by accepting money for a government purpose.

31. Government officials and government agents should not be permitted to establish government religious beliefs, or establish government party religious beliefs that persecute people of diverse government or religious beliefs or teach the lie those who speak, associate or worship differently, are the enemy just because they do not conform with the government religion, which I believe is business greed, not good by unconditional love and respect for fellow Americans. Government agents should not be permitted to incite private citizens, or public citizens such as the National guard, police or military, to commit violent acts or threat of violent acts against Americans based on political-religious beliefs or perceived political-religious beliefs or false threats to harm to property not yet ripe for correction.

32. The Defendants should not be permitted to take away my active license to practice law or to label me "disabled" for my religious or political beliefs and speech reflected those beliefs, to chill my speech, religious belief, or association as a colleague licensed attorney, as an indigent, as a Christian or as a democrat.

33. My faith in God through the father, the son Jesus Christ and the holy spirit is not a disability.

34. Jesus taught you cannot serve God and money. *Matthew* 6:24. Money is not my savior, and is not what drives me to get up each day, my love for God is. The fact the defendants

do not understand my belief, does not make me "disabled" for thinking and believing differently.

35. People talk about President Trump as "anointed by God." See, US Ex-Ex 34, Fox News, '*I hope it's true': Trump responds to claim he was chosen by God*, By Caleb Parke, June 25, 2020; US Ex-Ex 34, Fox News, *University professors say more church goers believe Trump is 'anointed by God'*, By Caleb Parke, May 13, 2020; US Ex-Ex 36 CBS NEWS, *Trump tweets quote calling him the "second coming of God" to Jews in Israel*, By Sophie Lewis, Aug. 21, 2019.

36. People have accused me of not being a Christian because I am a democrat, or because I am a catholic, or because I do not support President Trump, or because I am not a republican.

37. There is a dangerous religious entanglement of political beliefs held by impassioned misguided people to believe the use of violence against perceived enemies of their religion, government-religion, is warranted to defend their God.

38. I am reasonably concerned about my safety given someone talked about shooting me for my mere stickers, especially with the rise of violence based on people of diverse political and religious beliefs and speech, including protests, throughout the country.

39. Additionally, one of my neighbors, who previously threatened to ram into my car, if I parked it in front of one of my parents' empty lots, who previously cursed at me, and threatened to use his gun if someone trespassed on his property at a development meeting, started yelling at me threateningly concerning a banner, speech, I wanted to put up temporarily on my parents' lot. I was reasonably scared, after a stranger had talked about shooting me, after this neighbor threatened to ram my car, or use his gun in a development meeting. So, I called the police, per the attached report**.** District Court Exhibit 2.

40. Should the Defendants be permitted to label me "disabled" and I am in actual

danger in the future, that label may prevent other people from taking me seriously or from helping me. I am scared of potential violence taken against me.

41. My friend, Greg Layton and his wife were shot at in their home for their alleged speech as I indicated in my DE Supreme Court Brief. There has been an uptick in violence in our nation. District Court Exhibit 3. On January 6, 2021, an attempted insurrection occurred at the capital, and people are still talking about "hanging the politicians," civil war and overthrowing the government in Sussex County. It is scary. I am concerned about my safety as I seek to freely exercise my speech, association and religion. That is one reason why I asked the Chancery Court for protection to reduce the violence I believe rooted in the establishment of government-religion by barter or exchange, not freedom or free exercise of religion. US Ex-Appendix E.

42. I disagreed with people in power, including democrats by proposing different ideas concerning healthcare, by laws that require products made to last, made to work instead of made to disintegrate, polluting in producing replaced items or replaced parts, while costing the customer more money, or penalties, such as taxes, to reduce pollution by making it too expensive to use products or services that it reduces use, and thereby reduces pollution, and my opposition to the death with dignity acts and abortion and other areas, including my opposition to violating my religious beliefs.

43. I believe associations such as a party, my democratic party, and other entities are weaker than individuals within such association or entities, who have freedom of thought to think beyond the conditioned will of the entity, or group, to care to know, and care to love one another beyond conditions, unconditionally.

44. The right to assemble and associate must be protected, but the right of artificial entities such as associations must not sacrifice individual's liberty to maintain existence. The

right of free will, freedom of conscience, of each individual, outweighs the mob, conditioned, controlled will of associations and other artificial entities without hearts that run on money or conditioned interest or labor. The freedoms of associations and entities must be more limited in order to protect individual liberty, which is safeguarded under the First Amendment. Disagreements, finding flaws in ideas within entities and associations helps us to learn how to improve which is strength not weakness.

45. My freedom to think differently, by my free will, as opposed to forced government agent will must be protected, to protect other individuals in their exercise of freedom of conscience to worship, to speak, to associate, to live out their religious beliefs.

46. I may be attacked or demeaned by those in government or private power who disagree with me, just like I am being attacked by Defendants who disagree with me in *Kelly v Trump*. I may need the safety of the courts, police or others who may find me not credible based on such a label disabled, or I may be discredited and ignored with a procedural determined label disabled thereby quieting my speech by a government forced title, "disabled" which will likely suppress my speech from being heard.

47. I upset people by the following activity: I sued the Democrats Democratic Party in the state of Delaware. US Ex-Exhibit 2**.** I drafted five separate proposed articles of impeachment, and contacting each and every 541 Federal law makers to persuade them to impeach former President Trump relating to the porn star payoff, to safeguard the freedom of the press under 18 USC § 227, to safeguard the freedom of speech and freedom to assemble to protest by the NFL players pursuant to 18 USC § 227, to prevent world war 3 with regards to Iran, and to protect due process of law and alleged foreigners from being kidnapped and placed in detention centers in conditions so horrific as potentially violating the 8th Amendment's protections against cruel and

unusual punishment. US Ex-Ex. 7, and see US Ex-15, to see more laws I allege former President Trump violated in my proposed articles of impeachment.

48. I proposed changes to policies or laws that safeguard individual liberty and human life and health as opposed to safeguarding money, which irritates people who value money more than humanity. For example, see, US Ex-Ex. 8, US Ex-Ex. 43. US Ex-Ex 46. District Court Exhibit 4.

49. I also often make comments in my continuing legal education class, like I used to in my bar sections. Even though the instructors may want to train us to think as they instruct, instead of encouraging us to use our own free will to think for ourselves, instead of the conditioned, trained, forced will of imperfect instructors to analyze potential concerns with the legal instructors' proposed solutions to issues. District Court Exhibit 5.

50. I sued former President Trump, and seek to sue President Biden by substitution. US Ex, US Ex-Ex A, and US Ex-Ex 2.

51. I will continue to critique our government leaders' policies and proposed law.

52. The label "disabled" will demean my reputation before law makers and government officials preventing my speech from being heard, making my desire to serve God by seeking justice by just decrees that care for people, as opposed to unjust decrees that reward business greed by oppressing, harming or exploiting people, will be left unfulfilled.

53. I will continue to critique policies and laws and suggest more just decrees to prevent hardship, as opposed to unjust decrees that exploit need to make material gain off of hardships, instead of alleviating the need of the people.

54. I desire to prevent evil planned schemes by using my freedom to speak without government sponsored persecution or suppression of my speech by forcing the defamatory title

of "disabled" upon me, for believing the ways of Jesus instead of the ways of the world which I believe the bible teaches are controlled by business greed, temptation to reflect the evil one, not the image of God by love for humanity. See, 1 *John* 5:19 "We know that we are children of God, and that the whole world is under the control of the evil one." Also see, 1 *John* 4:16 "God is love." When we sacrifice worldly gain to care for those in need at a worldly loss, that is reflecting the image of God by unconditional love, not conditionally caring based on relationship, reward or avoidance of harm.

55. Global policies look like they will lead to a global famine. The US is not the only country that had large scale persecution towards migrants who desired to harvest fields, potentially creating fewer harvested crops.

56. There is also evidence of policies exacerbating inflation instead of alleviating it. For example, to save the post office, the federal government should reduce the price of postage to a quarter. That way people could afford to buy a stamp, and the post office would make money in bulk. The post office should also cut package rates in half to attract business away from competitors instead of towards competitors.

57. Instead, the post office increased rates of postage and will sell fewer shipments, and thereby the post office will make less profit from shipments.

58. Suppliers of products may increase prices of products and goods based on the increase in shipment costs through the US post office, needlessly creating inflation, during a global pandemic, where many through no fault of their own, are out of work.

59. The post office is one of the few forms of speech that may not be easily manipulated, monitored, bought and sold by third parties, making free speech no longer free, but monitored to be bought and sold for a potential outsider's pecuniary gain.

60. There is evidence that global leaders, private and public, including American participants, through organizations such as the Federal Reserve, World Economic Forum, the Bank of International Settlements, the International Monetary Fund, the World Bank, and possibly the United Nations through their public and private partners desire to digitalize everything, currency and shipments, and to artificially cut off shipments through electronic disconnections, hacks to manipulate markets to artificially inflate prices to force individuals in government private partnered forced servitude. District Court Exhibits 6, 8, and 9.

61. The Federal Reserve is the United States' private central bank which makes more money the more debt the country and the people are in. The more money created by debt gives politicians more play money, creating an obstacle, a temptation, for government employees, such as Presidents and congressmen, to serve their self-gain instead of the people and the country by increasing desperate conditions and debt to gain more play money to buy and barter favors with.

62. Janet Yellen, former federal reserve chair has a conflict of interest with the best interest of the country and the citizens she serves, since she desires to increase the debt ceiling, as opposed to creating money out of nothingness to care for the people by the creating paper money, instead of creating money out of nothingness to enslave the people to pay back banks, including the federal reserve for their free lunches.

63. Janet Yellen also has participated in meetings at the Bank of International settlements, a global entity that acts above the law, like the UN, and other entities that are rather difficult to hold accountable by the rule of law. The Bank of International Settlements looks after the central banks interest which is making money off of creating debt, which is harmful for humanity and the United States interests. See, https://www.bis.org/author/janet_l_yellen.htm

64. The President through an executive order or Congress through the coining power

has the power to eliminate the debt, fully pay for federal expenses, instead of increasing the debt ceiling as former Federal of Reserve Chair, Janet Yellen suggests, which may make the government become a debtor nation to the World Bank, no longer a free country.

65. The United States also should dissolve global partnerships with the UN, the World Bank, the Bank of International Settlements, the International Monetary fund since partiality towards these partnerships towards partnerships, global or local, blinds our government servants' eyes from seeing clearly to care for the people.

66. I recently discovered America was never free. This country has always been for sale, by those who buy influence through alleged donations or steal it to sell it to those who barter for their favor or potential favor by donations, tax breaks, favors or support to government candidates or servants in exchange for unjust decrees that favor those who favor them or bailouts for bad business or worse to entities as opposed to individuals.

67. I learned we do not have a free market. We have a manufactured forced controlled market stifling innovation under the guise, the lie, that more money to fund greed will create more innovation when it rewards more misbehavior into infinity for a different drug, or research product, or different use for the same product or bad business through bailouts, or fundraisers or grants to give money to the wrong doers who caused the problem.

68. I recently learned, though I knew in the back of my hard head, that we do not have free market globally, but a forced controlled market by entities who control countries and entities within countries, both private and public entities, like parts in a factory line. I am not only thinking of the Opium trade where Great Britain misbehaved by growing opium in India and selling it by force to addict people in China to buy more, causing the Opium War of 1842 and other abominations throughout world history.

69. More recently, I read the plans of the founder of the World Economic Forum, Klaus Schwab. Countries, including the United States by private and public sectors appear to be implementing parts in Klaus's Frankensteinish model, the space race, alleged reading thoughts, driverless cars, automation at the checkout, bio editing DNA, increased digitalization, and more. On an aside, I do not believe our mind can be read. I believe our emails can be read.

70. We have a forced, controlled market, eliminating people's free choice and freedom of innovation by freedom of thought, speech and exchange of ideas, by forced across the professional associations across the board's forced will of a few who profit off of the many. District Court Exhibits 8 and 9.

71. In my complaint below, I also mentioned unnatural conditions leading to famine and price increases, and increased desperate conditions leading to volunteering, pro bono, organized charity and fundraising which I believe Jesus teaches damns people to hell in *Matthew* 6:1-5, and the elimination of government welfare which is Godly and good. US Ex-Ex A.

72. Welfare helps those in need without exploiting such need to serve greed by corrupt bought, not free partnerships with private entities, such as heartless not for profits, businesses and entities called charities.

73. Secular Government Welfare, as opposed to charity, to care for individuals in need is commanded by God. See, *Deuteronomy* 24:19, "When you reap your harvest in your field and have forgotten a sheaf in the field, you shall not go back to get it; it shall be for the alien, for the orphan, and for the widow, in order that the Lord your God may bless you in all the work of your hands." See, *Leviticus* 23:22, 'When you reap the harvest of your land, moreover, you shall not reap to the very corners of your field nor gather the gleaning of your harvest; you are to leave them for the needy and the alien. I am the Lord your God.'" *Ruth* 2:2-3 And Ruth the Moabitess

said to Naomi, “Please let me go to the field and glean among the ears of grain after one in whose sight I may find favor.” And she said to her, “Go, my daughter.” So she departed and went and gleaned in the field after the reapers; and she happened to come to the portion of the field belonging to Boaz, who was of the family of Elimelech.” *Exodus* 23:11, “You shall sow your land for six years and gather in its yield, but on the seventh year you shall let it rest and lie fallow, so that the needy of your people may eat; and whatever they leave the beast of the field may eat. You are to do the same with your vineyard and your olive grove.” This allows the poor to pick up and gather the crops and sell them or use them for food.

74. I also have ideas on how to reverse or prevent an economic crash should the elimination of the dollar occur, as the World Economic Founder plans.

75. Congress can take back its delegated power to coin money without borrowing it to care for its people. This will not deter people from working, and may be used within limits for those in need as opposed to exploiting need to serve greed, to care for, instead of exploit, the elderly, the unemployed, the poor, and people with disabilities and disease, while safeguarding each of these individual’s freedom.

76. Our current model creates artificial, unearned debt, in violation of the bible and the thirteenth amendment against forced servitude for unearned unjust riches for those who steal, kill and destroy to serve business greed, not good by love. See, *Ezekiel* 18:13, “He lends at interest and takes a profit. Will such a man live (meaning eternal life)? He will not! Because he has done all these detestable things, he is to be put to death; his blood will be on his own head.”

77. With regards to proposing policies, and solutions, I discovered a plan to crash the dollar, the economy, and overthrow the United States governing power.

78. Our leaders have been implementing policies in the founder of the world economic

forum, Klaus Schwab's books, with the founder's goal of illuminating freedom, free will, by forced economic need to survive in a sort of cyber fiefdom model.

79. According to an article, included as an exhibit hereto, by the World Economic Forum, "(We w)on't" anything. (We) w)on't own a car. (We w)on't own a house. (We w)on't any appliances or any clothes." District Court Exhibit 6, also found at: https://www.weforum.org/agenda/2016/11/8-predictions-for-the-world-in-2030/

80. It appears the goal is to increase desperate conditions, by taxes, or placing sensors on everything to charge by units, time or use, by eliminating paper money and tracking every purchase from every person to target that person to get as much as they can for as little as they can, tracking water and sewers to charge fees, fees for mileage of vehicles and more, to force people to lose title to their real property.

81. I had researched a proposal that indicated that real property may back a global currency, but my computer crashed and I lost all my information.

82. I discovered former President Trump appeared to have an interest with an entity that had global connections buying up real property that might be connected to this alleged plan. District Court Exhibit 7.

83. I was able to keep the entity information because I emailed it to my opponent in *Kelly v Trump* before my computer crashed wiping it clean of all files. Id.

84. I wanted my opponent, in *Kelly v Trump*, United States District Court Attorney for the District of Delaware, David Weiss, to try to protect the United States from an economic crash, by guiding the courts to be our heroes during such perilous times, in case he becomes the only hope we have. Id.

85. With regards to the elimination of private property, including ending private

ownership in real property, Delaware appears to be implementing a takeover of private real property towards government ownership, which may in turn be used to give to the creditor of Delaware and government debts, losing not only private control of real property, but public or government control of real property to pay back artificially created debt down the line, making the Americans and the United States government no longer free.

86. There is land dedicated to government bodies in Sussex County on the condition such land is not resold. The obvious intention of the deceased grantors was to preserve nature, wetlands and natural habitats. The government entities misbehaved by granting 99-year leases, where the trees were bull dozed, nature destroyed, the land leased, and homes were built and mortgaged on said 99-year leases, ignoring the obvious intended condition of the dedication, preservation of nature to gain more government money through leases or transfer taxes, and favors from developers who build mortgaged homes on the 99-year leased real property.

87. Similarly, some owners of farms in Sussex County received government pay in return for giving the state of Delaware construction easements above and below the property, as approved by Sussex County Counsel. While, the state espouses the aim of preserving farms, the state will be tempted by harder economic times, as will farmers to sell the farms. The state will likely be the only ones willing to buy farm land others cannot build on.

88. By the doctrine of merger, the state through its employees may get the land in toto to invest, lease, sell and profit off of personally by trading favors with entities or people to serve their seat or interest at the public's expense.

89. Who will correct the government agents in the executive and legislative branches from misbehaving? Who will have standing in court? How can we reduce prevent government agents from giving into temptation to harm people's lives, health and the environment to serve

business greed, by barter or exchange, the mark of the beast, not mark of good or love? These are all questions I ponder. I think the solution is to safeguard the freedom to criticize government policies and practices, even the freedom to be wrong, or to have different ideas, without government retaliation, which includes the freedom for me to bring a law suit against former President Trump to dissolve government-religion, as protected speech.

90. I am also concerned about the state's plan to reassess real estate to increase taxes because the increase in real estate taxes will prevent potential home owners from buying a home by rendering it unaffordable by increased taxes, and possibly push home owners out of their home, ending private ownership of real estate per the sinister plans of the world economic forum.

91. Delaware had the highest rate of foreclosures out of all the states this year. See, Delaware News Journal, *Delaware sees highest foreclosure rate in U.S. this year, data analysis company finds,* by Sarah Gamard, dated, April 15, 2021, available at https://www.delawareonline.com/story/news/politics/2021/04/15/delaware-ranked-1st-u-s-foreclosure-rate-data-company-finds/7218522002/

92. Delaware lawyers had a hand in drafting the grants of 99 year leases to dedicated property to government entities and towns, ending private ownership in fee simple through leaseholds, defeating the purpose of preserving the land, and eliminating wet lands and natural vegetation.

93. It is wrong for our profession, lawyers, to conspire to misbehave, by harming the people we are charged to serve in our personal pursuit of money. We, lawyers, are not supposed to behave as children of the devil, a pack of wolves, looking after our own under the guise of looking after the sheep we are charged to care for, only to feast on their flesh, in violation of the bible. I believe people go to hell for taking care of their own, professional groups, or families, or

business or other entity, at the expense of oppressing or harming others to serve their business greed.

94. Lawyers and all professions should not collude for profit by self-regulating, and behave above the law too. The Court should give little deference to standards across professions and experts, since such standards look after the professionals and experts not those they are charged to serve.

95. Science is the study of things. Science always contains known and unknown variables including time, that make scientific results imprecise evidence to prove hypotheses. Once a person declares himself an expert, the master, the God, of his profession, he defeats science, which after all is merely studying things by ending such learning. No one is God but God. Please note, science, defined as the study of things, I believe proves God created things.

96. I like science, but I remain humble since variables, unknown and knowns is always part of the process. Should an expert lack humility, and exhibit pride or confidence, they should not be trusted as there is a conflict they may serve their profit, ego or cronies or they may be dumb, not understand science is learning, with variables that make all scientific determinations potentially inaccurate. Science is not perfect like math. Truth is preferred to false comfort. The law is balanced towards injustice by the court's deference towards professionals across the board, in the community or nationally, based on evil love for business greed, love for money, driving out love for one another by recognition of business standards.

97. Entire professions appear to be controlled not by free will, freedom of thought to innovate, but a forced will by funding and donations to schools, businesses, not for profits, charities, and through the conformed compelled will of those providing continuing professional classes, and professional organizations like the office of disciplinary council, all stifling

improvements that otherwise may be made by the free exchange of ideas, to gain the control or profit of entire industries by a few under the veil of science or guise of serving the public, while I believe damning most of humanity to hell for *Matthew* 6:1-5 violations, teaching business greed is good.

98. I believe the fact people were doing what they were told, adhering to professional norms, or doing their job, as they exploit customers or employees to gain as much money as they can for as little cost as they can, or harm human life and health, will damn people on the last day at the resurrection of the dead from their graves, not save people from being thrown into the fire the last day, should they not repent.

99. It makes me sad that courts often reward blind eyes, by insulating people from liability by permitting delegation of duties, rewarding not knowing or ignorance concerning harm.

100. I believe blind eyes and dumb ears, reflects the sin that damns people to hell, not choosing to care to think, to know, to love, not using their brains, their free will to consciously choose to love, should they not unharden their hearts.

101. Some laws encourage not knowing, when harm and hell can be prevented and people saved from deception for dollars by knowing truth in love, instead of giving into temptations to make some heartless entity money.

102. This summer of 2021, I read two books written by the World Economic Forum founder, *The Fourth Industrial Revolution,* by Klaus Schwab, 2016 version, which may be found at:

https://www.academia.edu/38203483/The_Fourth_Industrial_Revolution_pdf?fbclid=IwAR1ko Mak7N -40mbSf9wSGt8XzdhAJgafnbmobfn70FB4nbqcafl_hsN-RnQ

and *Covid-19:The Great Reset*, by Claus Schwab and Thierry Malleret, published 2020, which

may be found at:

https://carterheavyindustries.files.wordpress.com/2020/12/covid-19_-the-great-reset-klaus-schwab.pdf. Attached as District Court Exhibit 8 and District Court Exhibit 9.

103. These two books allude to the preventable, reversible planned elimination of the dollar, and an American economic crash by design, with about 47 percent of Americans expected to be unemployed by 2026-2027. including lawyer jobs. District Court Exhibits 8 and 9, page 38-39 of the Fourth Industrial Revolution, journalists are on the chopping block too

104. Per *The Fourth Industrial Revolution,*

> "Sooner than most anticipate, the work of professions as different as lawyers, financial analysts, doctors, journalists, accountants, insurance underwriters or librarians may be partly or completely automated… This research concludes that about 47% of total employment in the US is at risk, perhaps over the next decade or two," Id. At page 39.

105. Regardless as to the false sugar coating in the book, you must read between the lines in these books. *The Fourth Industrial revolution* outlines plans to make profit a different conniving way, not by improving the lives of humanity, instead by exploiting humanity for the love of money differently by eliminating property, by increasing desperate conditions. So people will allegedly use fewer resources, and no longer will afford to have private property. The majority of people will be forced to rent everything, and be rented by those who control the use of resources.

106. The books allude to, the dismantling of government by a takeover through the back doors to our electronic devices that President Bush opened up with the Patriot Act, and by government-private partnerships. Such partnerships allow the government to become powerless to enforce the rule of law against its own partners, private entities. Since governments collude with them. My goal in *Kelly v Trump* was to dissolve the bought, not free, or based on freedom. union of government-religion. This merely coincidentally is the first step to prevent the schemes to harm

humanity for the profit of a few. The US Attorney Generals may seek to prevent the planned global economic crash by dissolving government-private partnerships, dissolving corruption within the government by the spend it or lose it provisions rewarding waste, prevent bail outs, incentives and tax breaks to entities as opposed to people, and by prohibiting the requirement of paying, fundraising, or gathering signatures or support in order to participate as candidates, possibly in violation of bribery or fiduciary laws, such as 18 USCS § 201. Allow the vote to be the only form to elect leaders.

107. Alternatively, I believe the overthrow of the United States can be prevented by the government taking back its government coining power from the private sector, the Federal Reserve, a central bank which makes more money the more debt the people and government accrues. President Biden may draft an executive order to create paper money, without interest, and without debt to care for the people as both Presidents Lincoln and Kennedy chose to do.

108. 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 exploiting the masses to pay it back to those who do not earn it, but take it, essentially giving free lunches to those already fat, serving greed, not need, arguably in violation of the 13th Amendment. See *the Creature of Jeckyll Island*, *a Second look at the Federal Reserve*, by Edward Griffin, 7th printing 1998, which may be found at:

https://ia802609.us.archive.org/14/items/pdfy--Pori1NL6fKm2SnY/The%20Creature%20From%20Jekyll%20Island.pdf , for more information on how money is created. Also see Exhibit H which contains excerpts from the book. Please note, I disagree with the author's theories premised on violating God's law by attacking welfare, and social security, as welfare is commanded by secular laws in the bible too.

109. Banks create money out of nothingness to profit off of indebting the people and the federal government to pay interest on bonds. The government can coin money out of nothing to care for the people, without requiring they pay it back, or pay interest. Additionally, our bank system is a ponzi scheme, in that they lend out or sell what is not theirs to make interest profit, the depositor's money, potentially losing their customers money should a bank rush occur as the FDIC only has limited funds. Banks are rewarded by taking risky investments with someone else's money as they wrongly count on the government to bail them out, after the FDIC funds run out, at the cost of increasing desperate conditions upon the taxpayer in terms of inflation and taxes as a result of the banks, not the government, creating too much money out of nothingness to serve the banks' greed, not good.

110. Congress or the President through an executive Order like President Lincoln drafted have the power to create paper money out of nothing and pay back all debt, and pay federal salaries, and limit banks to lend out what they have on reserve instead of their depositors' money. If the government pays banks all debt due, banks will have reserves, their own money to lend out and risk. This will end the ponzi scheme the Federal reserve and banks adopted by the Bank of England, by ending lending out what they do not have, what is not theirs at a profit by interest, potentially causing bank crashes like the one in 1907-8 should a bank run occur. Bankers will make wiser and most likely fewer loans since they will lose their own money as opposed to the depositors' funds should debt not be repaid, preventing bank crashes and inflation.

111. Taxes could be eliminated too, to allow people more freedom to think and innovate and improve items and services, instead of being oppressed to conform to our manufactured economy of bad products and poorly performing services, made to break and repair or replace items, products that cause cancer, food that makes us sick, medicine that makes us feel better by

feeling nothing, inhibiting our faculties preventing us from using our free will, our conscience mind to think, care, know God, to love God and one another, I believe guaranteeing people's damnation in hell, instead of healthcare that heals, and laws that reward money at the cost of human life, health, the environment, and oppressing the least of these to bondage, enslavement to work for those who serve Satan by serving the bottom line, without regard to humanity outside of their own unless it affects them. Their freedom to think is more valuable than money. Money thrown at universities, candidates, not for profits, businesses, alleged charities or other fictitious entities without hearts who run on the bottom line, by philanthropists or donors who force their will to be done in a manufactured not free economy, prevents innovation, just like throwing government money at business, not for profits and charities does. Greed to fund bailouts and bad business is not good, and should not be rewarded and perpetuated.

112. Should either President Biden through an executive order, or Congress under Article 1 Section 8, coin money without borrowing it to pay off all debt, and fully fund the federal government, the risk of an economic crash will be prevented or may even be reversed, should a crash occur down the line.

113. Another problem arises, the stock market is a ponzi scheme too, by selling I owe yous, what people do not have in the form of shares of stocks, and what they may lose should businesses go under by design to get tax write offs.

114. I am not sure how to prevent the elderly from losing their retirements by design. Bad businesses should fail. Individual businessmen, members, executives, partners and other leadership positions, who profit off of stock buy backs, may store profit, salaries and bonuses in off shore accounts which are not susceptible to losses in economic crashes should not be rewarded. The system is rigged by design for the shareholder or the tax payer through bailouts to pay the cost

for losses which fund unjust gains for bad business. Even if the wrong doers pay cost, they may be able to write them off in tax breaks, but it is rather difficult to pierce the corporate veil, rendering members, partners and others within entities essentially above the law of accountability by design.

115. Should a stock market crash occur, losing retirees lives' savings, the government should coin money without debt to care for the elderly too, while protecting the elderly's freedom, their free will to do as they choose with the money, not be forced to use it towards entities or government private partners, unless they can think of a better idea to care for the elderly. There is a way out.

116. Part of the global plan appears to be to force the United States into debt to a global entity, essentially becoming controlled by that entity the World Bank, the Bank of International Settlements, International Monetary Fund or UN, making it no longer free, but controlled by debt.

117. 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.

118. Janet Yellen talked about delaying payments for social security which comes out of a mandatory fun, not a discretionary fund should the Federal Government default on their payments.

119. This does not appear lawful or just. Janet Yellen has a conflict of interest to make more debt to make her former entity the Federal Reserve more money at the cost of harming Americans.

120. Presidents Bush Junior, Clinton, Trump, Obama, Vice President Biden and Trump's daughter all know or should know of the intended elimination of the dollar, economic crash, and dismantling of the rule of law, replaced with the reign of lawless, unrestrained business greed, which I believe is the mark of the beast, the twice dead, people who sadly will go to hell because they are blinded by money or another idol, even their own life.

121. The Presidents and formerly Vice President Biden attended the World Economic Forum meetings.

122. If you read through the World Economic Founder's books, you will see the driverless cars and other items implemented in our government are all part of the *Fourth Industrial Revolution*. District Court Exhibits 8 and 9.

123. I am obviously going to care about other people, the world and our country enough to think of ways to prevent the wicked global schemes from happening, though I see implementations of the policies step by step occurring before my eyes. Defendants procedure to remove my active license to practice law as disabled inactive would diminish my voice, making my free speech, quieted by the controlled forced defamatory name calling by the Defendants, government agents.

124. I am going to continue to care about others and the threat towards the elderly with regards to losing their social security, and I will speak up on alternative solutions to prevent harm to Americans and the world.

125. I desire to prevent the evil schemes that will cause great harm under the guise of good.

126. A label "disabled" is not only insulting, but it will diminish my voice, and inhibit me from preventing planned, forceable, preventable harm.

127. Just because I think for myself, or I think differently, without giving into temptation to trained, conditional, conformed thinking does not make me disabled. Thinking for myself, even outside of the box drawn by those who seek to control choice or force choice, instead of safeguarding free choice, makes me reasonable and of sound mind.

128 Making mistakes in filings, given my lack of resources, extreme duress and emotional distress concerning what I believe is the government using my God's name in vain, does not make me "disabled." It makes me human, capable of mistakes with lack of resources to perform better.

129. My faith in God through the father, the son, Jesus, and the holy spirit is the most important thing in my life. By choosing to file the law suit *Kelly v Trump*, I chose to love God, by not standing by and allowing my God's name to be profaned by the establishment of government-religion that I believe glorifies man or sin in place of God, under the guise of Godliness, misleading many people I love to hell, and to the suppression of my religious speech and practice by those who adopt the government-religion and silence my speech.

130. I am horrified by the fact that about 750,000 Americans have died after contracting covid 19, during this pandemic. People are dying every day. I believe potentially being misled to hell for their adoption of government religious beliefs.

131. The fact I am saddened by the death of people who glorified President Trump as anointed by God while mimicking Trump's sinful behavior does not make me disabled. My heart is not cold. I care about people's lives and eternal lives.

132. The Defendants are initiating proceedings to place my license to practice law on, "deactive disabled," on account of having so attended court or testified through my pleadings, or to influence the verdict, presentment, in the Chancery Court or United States Supreme Court.

133. Defendants, and additional persons conspire for the purpose of impeding, hindering, obstructing, or defeating, in any manner, the due course of justice in any State or Territory, with intent to deny to any citizen, (me, Meghan Kelly) the equal protection of the laws, or to injure (her) or (her) property, license to practice law, reputation, speech, religious exercise, and association as an attorney, as a Christian and as a democrat, for lawfully enforcing, or attempting to enforce, the right of any person, Meghan Kelly, to the equal protection of the laws.

134. I have not worked as an attorney for over five years because I took time to do what is more important to me than earn money, serve God by seeking just decrees. As a Christian, I believe justice with mercy and correction to prevent condemnation are commands by God. See *Matthew* 23:23, *Amos* 5:15. My license to practice law is no threat to the public given I am not representing anyone. I do not plan to represent anyone until the pandemic subsides, as my life is more important than money.

135. While I worked at my former law firm as a real estate attorney, my friend a Delaware Attorney, Dick Goll, Esq., died, another Delaware real estate lawyer. Through his death I learned out of state real estate companies were practicing law without a Delaware license to practice law, exploiting people like my friend, the respected late Dick Goll, Esq., while allegedly messing up the chain of title per members of the real estate section of the Delaware Bar.

136. I recall people in the real estate section of the Delaware bar indicating sometimes there were title company addresses with no lawyer address to contact for deeds with errors, making the chain of title a problem for future buyers and sellers with no means to seek relief by an attorney who made such error, since no attorney was on the deed.

137. I contacted the Defendant ODC in order to seek to prevent future problems and loss of tax revenue from the state of Delaware. Since out of state title companies do not pay taxes

for attorney work, they unlawfully perform in Delaware.

138. I contacted law makers too, but no one helped me resolve the real estate issue. One law maker met with me concerning the issue of title companies only to be interested in a personal relationship and connections which was unprofessional and offensive.

139. My younger friend, who used to attend Chamber events with me, allegedly befriended this same law maker. She told me he kissed her. That is so gross. When people go to someone for professional help, they should not have to essentially prostitute themselves, not in the sexual sense, but by forming personal relationships in order to obtain professional help.

140. I continued to seek to find a way to prevent the real estate title issues. I talked to the Insurance Commissioner, but he ran a way from me at an event and his staffer merely wasted my time by offering to set up a time to talk to someone at his office about it.

141. A now retired Delaware Supreme Court Justice, Justice Holland kindly called me at my former law firm about the real estate title issues and offered to guide me on a different way to resolve the issue, by forming a committee to help the Court draft rules. However, if I was a member of a Delaware committee assigned by the government to investigate issues, I thought my rights, including the right to speak would be reduced, more limited, in order to safeguard the rights of those the government is charged to serve, as a possible government agent. I was concerned about losing my personal voice, in a committee with a communal conditional goal, whose aim may be concerning safeguarding the government's reputation, jobs and status as opposed to protecting citizens of Delaware from harm and the unnecessary need to increase taxes or deal with problems in the chain of title.

142. My law firm's office closed down at the end of 2016, and I have not practiced law on behalf of another person as an attorney representing another since then.

143. Instead, I remained concerned about the title company issues, and other federal and state law issues. I began contacting government leaders even more on other issues, and attending events where government leaders were scheduled to be, like Chamber events.

144. I sent so many comments to President Obama, he gave me a Christmas card, with an envelop spelling Delaware incorrectly, slanted left handed, which I loved even more. District Court Exhibit 10.

145. I proposed more comments to lawmakers, but my computer recently crashed, and was wiped clean, including of my old passwords to different emails like electmegkelly@icloud.com. See District Court Exhibit 4.

146. None of my comments to government leaders moved them to act. So, I decided to run for office in the 38th District for the District of Delaware in 2018, in attempt to fix problems myself. US Ex-Ex 51.

147. A local newspaper, the Coastal Point, kindly allowed me to draft an article relating to the title issues with a proposed solution to resolve the issues, and increase Delaware revenues without raising taxes, burdening the common man. US Ex-Ex 46.

148. To date, the title issue has not been resolved to my knowledge.

149. I continued to make comments to law makers, including on how to prevent oil drilling, safeguard social security, fully fund the schools and on how to improve healthcare.

150. I even drafted proposals for five separate articles of impeachment to impeach President Trump on. I contacted all 541 federal law makers by email, fax, phone call, post card or letter, on my quest to uphold the Constitutional laws that make us free.

151. However, none of my efforts made a difference. So, I looked into running for President without violating my religious beliefs by asking for donations or signatures, without

buying or being bought with money, but seeking the seat based solely on the vote.

152. I contacted the relevant election office in all 50 states regarding waivers for their fee or signature requirements. Both would require I violate my religious beliefs.

153. My religious beliefs were always at the forefront of my mind, but I sought a way I could be in a position to care for the people by creating just laws. I believe just decrees and justice in the courts is the solution, not money. The love of money, the security in money, teaching money is the savior is the problem not the solution. Since the love of money drives out the love for one another, and the love of God as savior, replacing money as savior. I believe the courts have the power to be life savers and eternal life savers by valuing and protecting the dignity of individual people, unearned, required, as worth more than money and material gain.

154. I called the US Supreme Court regarding the issue, and a staff member kindly recommended I write the US Supreme Court a letter. I did write a letter indicating, but the US Supreme Court was not able to respond as my issue was not ripe. See, US Ex-Ex 50.

155. I kept contacting law makers to propose my ideas, but I think they threw them away, did not read them, or sent me auto responses. So, I asked the Democrats if they would waive the signature and fee requirements as violating my religious beliefs, so I would not be forced to relinquish my first amendment freedom to exercise my religious beliefs in order to run for the US House of Representatives. US Ex-Ex 50.

156. The democrats denied my request, and I filed a law suit in the Delaware Chancery Court. US Ex-Ex 2.

156. I withdrew my law suit because Covid 19 hit the world. Since I studied the history of medicine in a course at UD, and grew up with health professionals, my mother a pharmacist, my Grandmom, Cecilia Batten a pharmacist, and my other Grandmom Rosie Kelly, a nurse, I

knew it would be serious and did not want to endanger people's lives and health to merely gain a position to pass imperfect, albeit I hoped more just decrees that cared for the people as opposed to harming them to serve business greed and the love of money. I am an imperfect person. I am not God, yet I have the love of God in my heart that teaches me to lay down my world desires, sacrificing to self, to care to love God and others as myself.

157. I was also communicating with my last law firm, negotiating coming back on board as a real estate attorney performing real estate settlements. But I set aside talks due to the pandemic, and due to the government establishment of religion that I believe caused a substantial burden upon my free exercise of religion, by causing people to demean me as not a Christian, to insult me, and endanger me, and my exercise of my religion, speech and association without the protection of the Court. The violence throughout the nation based on religion or political association is not normal and I believe we, I, needed someone to govern and guide our nation with correction to prevent additional harm towards me and others throughout our country and the world. I hoped the Court would be our hero.

158. I filed *Kelly v Trump* to protect my free exercise of religion, speech, and association from government sponsored persecution for such exercise, and to dissolve the establishment of government religion by seeking to enjoin former President Trump and current President Biden from enforcing executive orders creating a union of government-religious entity partnership, including enjoinment of Executive Order No. 13798, maintained and reestablished by President Biden by his enforcement of E.O. 13798, and President Biden's enforcement of Ex. Or. No. 13198, Jan. 29, 2001, as amended by Ex. Or. 14015, Feb. 14, 2021; Ex. Or. No. 13199, Jan. 29, 2001, as revoked by Ex. Or No. 13831, May 3, 2018; Ex. Or. No. 13279, December 12, 2002, as amended by Exec. Or. No. 13559, November 17, 2010; Ex. Or. No. 13559, Nov. 17, 2010; Ex Or. No.

13831, May 3, 2018, and Biden's enactment of Ex. Or. No. 14015, Feb. 14, 2021 ("executive orders"). These executive orders allow money or support to be transferred between government agents and religious organizations.

159. I believe the money in the bought, not free union of church and state is one reason why religious-political attacks seemed to have increased in recent years. President Biden's Valentine's Day executive Order, Ex. Or. No. 14015, Feb. 14, 2021, is troubling since it appears to allow government money to be bestowed to religious organizations, like churches in other countries.

160. My exercise of speech in the pleadings based on my religious beliefs, are in issue. In elaborating on my beliefs, I find it repugnant for the President and the United States government, state governments and local governments to use my God's name to glorify government or men in government or government business, by establishing government-religious unions in the form of partnerships, essentially making it appear they are working with God or are backed by God, to the extent it has caused physical symptoms related to my horror, clenching of teeth, tears, pain in my heart, sleepless nights and anxiety. Since I believe it misleads people into giving into temptation to sin, confusing them into thinking evil is good, believing a lie as truth, damning them to hell on the last day should they not be saved by the truth of love to conquer wicked lusts, to conquer sin. I believe glorifying business, (like glorifying marriage or child bearing or death, martyrdom, punishments for original sin) by performing business with religious entities as Godly, teaches the mark of the beast, the mark of the whore, the twice dead, the mark of children of the devil is Godly or good. Business or work is a punishment outlined in *Genesis* 3 to teach humility, part of people's lives, not the purpose of life to be glorified and praised misleading people to hell by the sin of pride. The bible is clear. Not everyone is welcome in church or heaven. Those who do business

as worship serve the God of money, not the God of the Bible. Jesus chased out those who did business under the guise of worship in the place of worship, church or temple. *John* 2:16. Those who do business under the illusion of Godliness are not welcome in church or in heaven should they not repent. Those who do business under the guise of good, Godliness, or love, when it is giving to get, for recognition, tax breaks, marketing, networking, trading favors or otherwise through fundraising, not for profits, pro bono, volunteering, organized charity, beneficial entities, beneficial corporations (I believe the new beneficial corporations violate Jesus's teachings in *Matthew* 6:1-5, while using other people's money, the shareholder's money, to potentially buy favors under the illusion of benefit or good, exhibiting the mark of the beast as beneficial, serving business greed, not good), not unconditional love, sacrificing material gain to care to love God or one another as ourselves, are not welcome into heaven. I believe they will be thrown into the fire the last day at the resurrection of the dead on the last day. Sadly, God teaches the confused, those who do not know, those who misunderstand will be destroyed the last day. Making people feel good, instead of helping them be good, have life and eternal life, is no good. It is bad and unloving. I would rather love people by dissolving this unholy, whored, bought or bartered or aligned union (supported by taking someone else's money, the tax payers to fund ventures), of government-religion, not free or based on freedom of church and state, to prevent deception that damns, while also protecting people's freedom, their free will from the forced will of government-religious partners by economic or social pressure or temptation to compromise Jesus's teachings to meet worldly needs.

161. In my religion, Christianity, the first civil King of Israel, Saul was separate from the religious leader Samson. The second King of Israel, King David, was separate from the religious leader, Nathan. Even Jesus the Christ, was separate from the civil leader Caesar.

162. Keeping religion and government separate allows the government to guide and govern private entities, including religious entities. If the government partners with private entities by grants or otherwise, its hands may be too dirty to clean the hands of the private entity it colludes with, essentially making partners, in this case religious partners above the law. Which is troubling, since the Supreme Court has already wrongly indicated, the courts have no place to guide or govern with the rule of law the internal affairs of religious entities as distinguished from the religious individual, making churches and religious entities to appear to already be above the rule of law in some cases. The Supreme Court erred in *Our Lady of Guadalupe Sch. v. Morissey-Berru*, 140 S. Ct. 2049, 207 L. Ed. 2d 870 (2020), rendering religious entities to lawlessly do as the please, fire employees unjustly without a remedy. It appears that if a religious organization allows an entity to discriminate, to do what is most advantageous for the bottom line regardless of the harm, so long as they use the name of God or religion, the entity may use its religion, including non-religion as a religious belief, to force people, employees, suppliers and customers, no longer free to bend to the religious organization's will to serve business greed, the mark of the beast, without discipline to sacrifice material gain to love humanity, including elderly or weak employees, in the form of the rule of law, or love written on humanity's heart per Jeremiah 31.

163. Keeping government and religion separate also allows government servants to allow their individual strength in being human, the power to choose to love, and outside appeals to a conscience to govern their character with humility, grace and mercy to better care for the people in their charge.

164. For instance, In the Bible Nathan, a religious leader, courageously confronted the Second King of Israel, King David for sleeping with another man's wife, impregnating her, then conniving schemes to allow the man to have sex with his own wife, to cover up his adultery to no

avail, only to set the man up to die in battle.

165. The confrontation allowed King David to repent, to be made clean and saved from the second death in the fires of hell, the last day at the resurrection of the dead.

166. In a similar way, my love for God, and desire for God's will led me to confront government officials in order to prevent harm to me and the population they serve, and in hopes government leaders will conduct their jobs with humility, grace and respect for individual liberty as more important than money earned by performance of their duties

167. I confronted the Delaware Supreme Court when they violated my religious rights to affirm instead of swear into the Delaware Bar. US Ex-Ex 3.

168. I twice rejected appointments to family law matters as violating my religious beliefs. US Ex-Ex 4.

169. I confronted the Courts in Delaware per the attached letter concerning impartiality and bias. US Ex-Ex 5; (Also see, Leviticus 19:15 ""You must not pervert justice; you must not show partiality to the poor or favoritism to the rich; you are to judge your neighbor fairly"); (see, Exodus 23:6, "You shall not deny justice to the poor in their lawsuits."); (see, Deuteronomy 16:19, "Do not deny justice or show partiality"); (also see, Deuteronomy 1:17, "Show no partiality in judging; hear both small and great alike. Do not be intimidated by anyone, for judgment belongs to God. And bring to me any case too difficult for you, and I will hear it.").

170. I even shared my view on what using the name of God in vain means when I proposed a suggestion to defeat ISIS to Senator Tom Carper of Delaware using words of reason, not weapons and barbaric uncivilized violence. US Ex-Ex 6. I believe it means using the name of God, or religion or scripture for man's purpose instead of a true religious purpose.

171. My love of God, and subordinately my love for others is not a disability. Seeking

to protect the freedom to worship, willfully, not under force, threat, conditioning or training of government through its partners, even of diverse beliefs, is something I choose to protect in my religion. There is no love in the government, by the intrinsic power it wields, in forcing its religious-political will, or its religious partner's will upon others under the threat of social, economic or physical persecution. Love must be freely chosen. Otherwise, it is not unconditional love, just conditional, trained, forced behavior. I believe our government is wrong to kill people, even ISIS based on religious-political views, instead of using words of reason.

172. I am insulted by the Defendants claims against me as "disabled," but for my petition in *Kelly v Trump*, religious belief, association and speech. They insult my God. Thinking for myself and believing as I freely choose instead of the trained, conditioned, forced will of the government through entities who value money or professional business over God as a savior, makes me of sound mind. My faith commands me to be separate, meaning do not sin just because the world sins. I should not be required to choose between the exercise of my first amendment rights to worship, speak, associate and petition, even as an indigent pro se party, even imperfectly, and even as an unemployed impoverished party who is licensed to practice attorney, and the maintenance of my license to practice law as active, as Defendants appear to require. I should be permitted the opportunity to work as an attorney, even though I value my faith in God, free speech, association more than work, and am not working at this time in order to stand up for Jesus in court, as a party, not as an attorney, at this most critical time in our nation.

173. During *Kelly v Trump*, I have been, at times, without access to a working computer, a printer, legal resources, even my vehicle at times, due to lack of means. That does not make me "disabled," incapable of performing attorney work. It makes me disadvantaged in my own case, where I am not performing attorney representation of others, as I would if I was employed with

the adequate tools to conform to attorney work. Defendants require I lose the right to petition the court, as a party, not as counsel, if I am impoverished and without means to advocate as an attorney, or lose my license to practice law, as inactive, preventing me from ever gaining the means to represent others through employment with a law firm and possibly employment at other places.

174. Defendants compel me with the choice between losing my paid for active license to practice law, or losing my ability to exercise fundamental First Amendment rights, deeming me unworthy of Constitutional protections as poor, or they claim disabled because I believe, think, speak differently based on my religious beliefs, in representing myself in case *Kelly v Trump* to safeguard those beliefs.

175. Defendants seek to penalize me as unworthy to exercise my right to petition because I do not have the tools to advocate as an attorney for others at this time because of my unemployment, by taking away my prospect of becoming employed and gaining the tools I would need to represent others.

176. Defendants seek to penalize me as unworthy to practice law due to poverty.

177. Poverty is not a disability.

178. I am not less worthy of protections under the Constitution due to my unemployment, poverty, religious beliefs, association or speech, or exercise of my right to petition which is strongly impacted by my belief in Jesus as God, not business as God, not money as God, not even government as God, as free speech, allows me to criticize even government in hopes to improve it, and maintain it too.

179. I am filing this case before the Honorable United States District Court in the District of Delaware to enjoin the Defendants retaliation against me for 1. exercise of my religion, speech, association, and right to petition grievances, and 2. for the First Amendment right to petition

grievances related to *Kelly v Trump*, to prevent disciplinary proceedings for the exercise of my fundamental rights, based on Defendants' intent to cover up government agents' behavior, or to demean my credibility and reputation to belittle my speech, religion, association or petition for relief in *Kelly v Trump*, based on Defendants disagreement with my beliefs, speech, religion, and petition for relief, or to penalize me for speech, religion, association, poverty, and petitioning the court, as an indigent party, albeit even imperfectly to defend my First Amendment rights against government persecution.

180. All of the rights, my right to petition the court, my free exercise of speech, religion, association are fundamental rights protected under the strict scrutiny standard, and must have a compelling or important justification to retaliate or punish me or violate, narrowly tailored to such justification.

181. The Defendants have no important or compelling justification to interfere with an active case to retaliate against me for 1. my federally protected exercise of religion, speech, association, or the right to petition grievances, and 2. for my exercise of the First Amendment right to petition the court for grievances in Kelly v Trump.

182. I am not practicing as an attorney advocate on behalf of another. I am unemployed, and I will seek to gain my old job performing real estate settlements after the pandemic subsides, which will not likely be anytime soon, if they will still be interested in me, after the Defendants embarrassing initiation of proceedings brought for improper purposes since there is no great need to interfere with an ongoing trial to seek to deactivate my license to practice law, but for the case, to intimidate me into forgoing my case, as an injured unrepresented party, or demean my credibility so as to diminish the effects of my speech, religious exercise or association in the eyes of others, and in the eyes of the Courts, including the United States Supreme Court.

183. It is improper for the ODC to take action against me during an active case that is currently being considered before the United States Supreme Court Case No. 21-5522, with intent to interfere with the law suit or demean my credibility.

184. There is no immediate need for the ODC to act. I am no danger to the public as an actively licensed attorney, not currently practicing law or expecting to practice law on behalf of others since I am holding off on contacting my old law firm until my case *Kelly v Trump* is over, and the pandemic subsides, and now must hold off on renewing negotiations until the issues in this case are resolved.

185. In *Kelly v Trump*, I am merely defending my fundamental rights as a party, not practicing as an attorney, which rights I should not be compelled to waive because of lack of resources attorney advocates need to perform their duties for others, as opposed to acting as a pro se, indigent party.

186. Patricia and the ODC are retaliating against me with an additional intent to inflict emotional distress, or in reckless disregard of infliction of emotional distress, and have caused emotional distress embarrassment, sleepless nights, heart pain. anxiety, grinding of teeth, utter horror, fear, tears, and emotional harm.

187. In the pleadings I indicated the Court staff appeared to demean me of unworthy of access to the courts because of poverty, religious beliefs or association, which upset me and made me cry. See US-A-4, US-A-5, attached hereto and incorporated herein.

188. Patricia and the ODC Knew or should have known that interference with my exercise of my First Amendment Right to petition to safeguard my civil liberties from substantial burden, by so burdening my free exercise of the right to petition, speech, association and religious belief, by threat of pecuniary harm, taking away my active license would upset me

causing emotional distress, embarrassment, humiliation, and pain in my chest. I attached evidence that I exhibited an increased blood pressure and pain in my heart but for caused by government sponsored attacks against me for the exercise of my civil liberties, including my free exercise of religion, speech, association, and freedom to petition the government to address grievances. US Ex-Ex 52

189. In 42 USCS § 1983 actions for emotional distress, embarrassment and humiliation, proof of elements of tort of intentional infliction of emotional distress is not prerequisite for recovery of compensatory damages; it is only necessary for plaintiff to show that (1) plaintiff has in fact suffered emotional distress, embarrassment and/or humiliation, and (2) defendant's actions proximately caused plaintiff's injury. *Aumiller v. University of Delaware*, 434 F. Supp. 1273, 1977 U.S. Dist. LEXIS 15317 (D. Del. 1977).

190. If proven, compensatory damages are available under § 1983 for mental distress. *Agosto v. Aponte Roque*, 631 F. Supp. 1082, 1986 U.S. Dist. LEXIS 27992 (D.P.R. 1986), remanded, 889 F.2d 1209, 4 I.E.R. Cas. (BNA) 1827, 1989 U.S. App. LEXIS 18910 (1st Cir. 1989).

191. Expert medical testimony is not required to prove emotional distress damages in 42 USCS § 1983 action. *Bolden v. SEPTA*, 21 F.3d 29, 9 I.E.R. Cas. (BNA) 676, 146 L.R.R.M. (BNA) 2065, 127 Lab. Cas. (CCH) ¶ 57650, 1994 U.S. App. LEXIS 6575 (3d Cir. 1994); See, *Flores v. Pierce*, 617 F.2d 1386, 1980 U.S. App. LEXIS 17814 (9th Cir.), cert. denied, 449 U.S. 875, 101 S. Ct. 218, 66 L. Ed. 2d 96, 1980 U.S. LEXIS 3269 (1980), (42 USCS § 1983 are not limited to out-of-pocket pecuniary loss but can also be awarded for emotional and mental distress caused by intentional tort.);

192. There is little question that once constitutional violation is made out under 42 USCS § 1983 plaintiff may recover damages for emotional distress, embarrassment, and humiliation, and in appropriate cases, punitive damages are also recoverable; in order to recover such damages plaintiff need only show that (1) he in fact suffered such damages, and (2) defendant's actions proximately caused plaintiff's injury. *Board of Trustees v. Holso*, 584 P.2d 1009, 1978 Wyo. LEXIS 228 (Wyo.), reh'g denied, 587 P.2d 203, 1978 Wyo. LEXIS 245 (Wyo. 1978).

193. In my petition for a writ of certiorari before the US Supreme, I alleged or referred to through documents emotional distress resulting in physical symptoms, as evidence of the alleged harm caused the Presidents' establishment of government-religion.

194. Patricia and the ODC knew or should have known that attacking me based on my pleadings relating to the most sensitive issue in my life, my faith in Jesus Christ, would cause me additional emotional distress. On October 3 through the 11th of 2021, I did not sleep through the night, and I usually have no problem sleeping soundly. I have foreseeably experienced severe anxiety, clenching my teeth, harming my teeth, tears, and heart pain, as a result of Patricia and the ODC's conduct, which has increased and intensified the amount of emotional distress based on government agents substantially burdening my religious beliefs, and my speech and petition to address grievances before the court to safeguard my religious exercise of my beliefs.

195. The fact Patricia and ODC may not understand my beliefs or the fact my belief in Jesus Christ or other beliefs may not make sense to them does not justify persecuting me based on my defense of my beliefs by seeking to label me as disabled preventing me from becoming gainfully employed as an attorney or otherwise.

196. At the start of my case in *Kelly v Trump*, I did not have a working computer or a

printer. Since the case began, I got a new computer, which broke twice, once after I filed a brief to the Delaware Supreme Court, and secondly on August 23, 2021, after I filed my writ of certiorari with the United States Supreme Court.

197. I just recently got my new computer fixed, but all of my material was wiped clean off of my computer.

198. The last week of September, I was compelled to purchase Microsoft Word to place on my fixed computer in order to respond to the ODC's September 27, 2021 threats by the filing of this Complaint. Preparing this complaint and the voluminous documents is especially tough for me with regards to not only funding, but lack of resources required such as ink, and a working printer, which I also bought the last week of September in order to respond to the ODC's September 27, 2021 threats by filing this complaint.

199. Unfortunately, on October 5, 2021 *Wal*mart and Target are out of the ink I need to purchase to use on my new printer Epson 522, black. So this reasonably also causes anxiety, which does not make me disabled. It makes me reasonably concerned, compelling me to act quickly with flexibility in order to defend my life, my belief and my livelihood from government persecution based on exercise of my fundamental rights.

200. The ODC and Patricia knew or should have known that I am of limited means to respond to their threats, since a letter from DE-Lapp alleged, they heard I was having difficulty paying my attorney dues, and I filed in forma pauperis in *Kelly v Trump*.

201. The ODC and Patricia knew or should have known that attacking my religious beliefs, speech based on my beliefs, would cause emotional distress, and upset me even more.

202. The ODC and Patricia intentionally upset me in order to argue the fact I exhibited emotional distress makes me disabled, when it makes me a human with a heart, not a cold heartless

person with the mark of the beast written on their forehead, by what I think, my heart and my hand by how I live. The fact I love God, myself and others instead of loving money and material gain makes me a Christian, who are "known by their love."

203. I sought protection from the court because I was scared I would get shot, and further harmed for exercising my speech, religion and association. I sued the Democrats. I sued Trump. I sought to replace President Trump with President Biden, and a determination as to whether my writ of certiorari is yet to be granted.

204. I drafted 5 articles of impeachment against President Trump, contacted all 541 law makers to impeach. I upset people who support President Trump and President biden. Yet, I choose to do what is right to please God not man.

205. People have talked about civil war, overturning the government and we recently had an attempt at an insurrection to expunge the election results on January 6, 2020 by violent force.

206. The arms of the court, Defendants, endanger my life in retaliation for my exercise of constitutionally protected rights and in response by me against court officials for seeking to sabotage, interfere, impede my case. The ODC appears allege my belief in Jesus is crazy and seeks to declare me disabled. The fact I think for myself, not trained, conditional forced thinking based on temptations of reward and punishment, and conditional relationships, praise and ridicule, makes me reasonable of sound mind.

207. I am a Christian, and my belief in God, and my desire to dissolve the establishment of government-religion so I, and others, may worship or not according to the dictates of our conscience, not the dictates of the government through its religious partners is the most important thing in my life.

208. This is real life and Defendants place me in real danger, to be demeaned if something further happens to me, as "crazy." So others may say “do not listen to her.” I disagree with both the democrats and republicans and those in power concerning bad ideas that are not solutions because I care about people above money and believe people’s free will, freedom to choose should be protected from forced, conditioning, and that laws should correct misbehavior not reward bad business that exploits customers, poisons their food or water, harms their health under the guise of healthcare and pollutes.

209. The arm of the court, ODC, endangers my life in retaliation for my exercise of my constitutionally protected right to petition the court for grievances, and in response to my additional petitions to the Chancery Court and Delaware Supreme Court for relief against court officials or arms of the state for seeking to sabotage, interfere, impede my case.

210. The ODC seeks to declare me disabled, but for and as a result of the fact I filed the case *Kelly v Trump* to safeguard my free exercise of belief in Jesus Christ.

211. I gave my life to God not money. Earning money is not per se evil. When money becomes your savior, your God, to the extent you harden your hearts to loving God foremost, and others as yourself, even the poor, foreigner, the sick, the disabled, I believe that is sin. Love is sacrificing material gain to love God and one another as more valuable than money.

212. I fear God more than I fear Defendants, and I must stand up for my right to imperfectly worship Jesus, freely speak my faith, and associate, and petition the court as a Christian.

SPECIFIC DELAWARE GOVERNMENT AGENT RETALIATION

213. I write to alert this Honorable Court concerning actions by state government agents taken apparently to impede and obstruct my access to the courts in *Kelly v. Trump*.

214. "The interference with and potential prejudice to the right of access to redress in state court rises to the level of a constitutional deprivation.'" *In re Cincinnati Radiation Litigation*, 874 F. Supp. 796, 823 (S.D. Ohio 1995); Citing *Fisher v. City of Cincinnati*, 753 F. Supp. 681, 687 (S.D.Ohio 1990)

215. The First Amendment prohibits state officials, employees, and agents from retaliating against claimants, such as myself, for exercising their right to access to the courts.

216. "Retaliation by public officials against exercise of First Amendment rights is itself violation of the First Amendment." *Zilich v. Longo*, 34 F.3d 359 (6th Cir. 1994), *U.S.C.A. Amend.* 1.

217. The state of Defendants officials intentionally retaliated against me for the exercise of my right to access to the courts, based on their disagreements as to my speech, religion and association, and beliefs, I seek to protect, even the right to criticize government officials, including Delaware arms and agents, and to stand up for my beliefs, no matter how repugnant the Defendants or others find my beliefs.

218. Arline Simmons ("Arline"), a Chancery court staff member in the state of Delaware, was my friend, prior to impeding my case. At least, I thought she was my friend in real life.

219. Arline advised me telling her things would not get back to the court, and was not the court, when I came to the Courthouse in person, near the inception of the case.

220. Arline was my facebook friend, and I thought my friend in real life too.

221. Arline indicated her support for former President Trump and for the ability of the government to share religious beliefs through its employees, by her communications at the courthouse and online.

222. My case, *Kelly v Trump*, seeks to dissolve government-religion, which conflicts with Arline Simmons beliefs.

223. Arline, intentionally misled me to almost miss the deadline to file an exception to the Honorable Master's final report, in an attempt to prevent my case from going forward based on her disagreement with my religious, political beliefs. See attached US Ex Exhibit A-4, which includes Appellant's Motion for the Delaware Supreme Court to rei(g)n 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, with the internal exhibits thereto, Exhibit 55, a December 1, 2020 letter by Meghan to the Honorable Master Patricia W. Griffin ("Master"), regarding Due Process concerns, E-mails attached thereto, and a letter I wrote to the Master, dated October 19, 2020, regarding Plaintiff Not officer of the Court/Economic Crash/Forum ("US Ex, Ex A-4").

224. I asked the Master for help. She kindly helped me. Id. At December 1, 2020 letter, my request for help, and District Court Exhibit 11, the Master Patricia W. Griffin's kind December 7, 2020 letter granting me relief. See District Court exhibit 12, my response to the December 7, 2020 letter.

225. The representatives at the Chancery Court demeaned me apparently based on poverty, association, speech, and religious beliefs. Id.

226. I experienced foreseeable embarrassment, loss of sleep, clenching of teeth, tears, humiliation, hurt and emotional distress as a result of the intentional retaliatory interference with my case to stand up for my free exercise of religion, speech and association without government suppression, manifesting in sleepless nights, which were rare to me prior to this case, clenching of teeth, pain in my heart, and tears at the betrayal of someone I cared about.

227. Arline also instructed me to cross off the address of the civil process clerk, the

Delaware local counsel in *Kelly v Trump,* with the intent to prevent the case from going forward based on covering up her misconduct and based on her belief in Trump-religion, both in violation of my first amendment rights. See attached US Ex-Appendix G, attached hereto, which includes therein a letter from me to the Delaware Supreme Court justices regarding the reason for the withheld subpoena to the civil process clerk, and the praecipes, dated October 12, 2020 for President Donald J. Trump, Civil Process clerk for the US Attorney's office for the District of Delaware, and US Attorney General William Barr, Esquire ("US Ex-App G").

228. My inability to serve the US Attorney General David Weis in the District of Delaware, caused great anxiety, confusion and distress. When I discovered the address crossed off, I became heart-broken because I still care about Arline outside of the court case.

229. Arline also kindly offered to allow me to email her documents so I would not have to drive to the library to print documents. She appeared to have the authority during this pandemic to do so. So, I accepted her kind help to keep us safe, especially since the Defendant former President Trump had contracted Covid-19, and I incorrectly thought the US Attorney General William Barr did too.

230. Another Court representative Katrina Krugar indicated Arline and I should stop Emailing, and all communications should be done through Katrina's email instead, during these confusing times of covid 19.

231. Arline and I both complied, temporarily as covid 19 continued to wreak havoc on the skeletal court staff that held up the Chancery Court in person, and I filed a Notice of Exception to a Vice Chancellor, who works with different court staff.

232. In addition, the ODC impermissibly interfered with this case by contacting Judge Kenneth Clark, per Judge Clark's admission, to interrogate me as if I was on trial for exercising

my right to petition the Court to safeguard my freedom to worship Jesus Christ without government incited persecution, substantially burdening my exercise of my religious belief.

233. In April 2021, Judge Kenneth Clark ("Judge Clark"), a Court of Common Pleas judge for the state of Delaware judge appeared to threaten me at a local BJs in Millsboro, Delaware, a bulk grocery store, while acting under the color of judicial and state authority, as if I was on trial for standing up for my faith in Jesus, solely based on retaliation of my exercise of seeking judicial relief in court for petitioning the court to alleviate the government sponsored burden government-religion has caused on my exercise of religion in the action *Kelly v Trump*.

234. It is improper and unlawful for state actors, especially judges to pressure a party in a case to drop, interfere or impede or prevent my access to the courts.

235. The ODC and Judge Clark clearly violated and encouraged the violation of my first amendment right to petition the courts, by seeking to use their government power, under the color of statutory or regulatory law to obstruct my case, and to retaliate and punish me for bringing my case.

236. The Supreme Court's two-step Saucier analysis governs whether a government official is entitles to qualified immunity, considering: (1) whether the facts alleged by the plaintiff show the violation of a constitutional right, and (2) whether the right at issue was clearly established at the time of the alleged misconduct. *Werkheiser v. Pocono Twp.*, 780 F.3d 172, 176 (3d Cir. 2015)

237. Judge Clark and the ODC knew or should have known that seeking to use his cloak of government authority, under the color of regulatory law, as a respected, fair judge to chill or condemn or interfere with my ability to bring this case without government retaliation or pressure, violates my First Amendment Right to petition the Court, and arguably my fundamental right to

speak, exercise of religion, and associate relating to my communications in my pleadings in *Kelly v Trump*, and communications in general.

238. My right to a fair, unobstructed trial to alleviate a substantial burden upon my free exercise of religion is a constitutional right.

239. "Congress, the Executive, and the Judiciary all have a duty to support and defend the Constitution." *Salazar v. Buono*, 559 U.S. 700, 717 (2010); See, See *United States v. Nixon*, 418 U.S. 683, 703, 94 S.Ct. 3090, 41 L.Ed.2d 1039 (1974) ("In the performance of assigned constitutional duties each branch of the Government must initially interpret the Constitution, and the interpretation of its powers by any branch is due great respect from the others").

240. "There is no 'de minimis' defense to a First Amendment violation." , *Doe v. Indian River School Dist*, 653 F.3d 256, 283 n.14 (3d Cir. 2011) ("*Elrod v. Burns*, 427 U.S. 347, 374, 96 S.Ct. 2673, 49 L.Ed.2d 547 (1976) ("The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury."); *see also Schempp*, 374 U.S. at 225, 83 S.Ct. 1560 ("[I]t is no defense to urge that the religious practices here may be relatively minor encroachments on the First Amendment.")

241. I will suffer irreparable harm if injunctive relief is denied.

242. 'The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.' " Mullin v. Sussex Cnty., Delaware, 861 F. Supp. 2d 411, 427 (D. Del. 2012); Citing, Indian River Sch. Dist.,653 F.3d at 283 n. 14 (quoting Elrod v. Burns,427 U.S. 347, 373, 96 S.Ct. 2673, 49 L.Ed.2d 547 (1976)).

243. I will face irreparable injury to my exercise of my speech, association, and exercise of religious beliefs by the government burden Defendants seek to cause upon me from such defamatory title, "disabled," embarrassment, emotional distress, lack of future employment, harm

to my reputation if an injunction is not granted to prevent the Defendants from retaliating against me for exercise of my First Amendment Rights by bringing an action to declare me "disabled" but for my exercise of my First Amendment rights.

244. I am standing up for my personal freedom to worship Jesus according to the dictates of my conscience, even if no one else shares the same beliefs, without government persecution.

245. I am permitted to believe differently than the government through its agents, even if what Jesus teaches, my beliefs, seem foolish or crazy to the Defendants. 1 *Corinthians* 1:18, 2:14-16.

246. I am disappointed in Judge Clark, and have high regards for him, but he knew better, as Arline knew better, De-Lapp knew and the ODC knew better than to obstruct and impede and seek to prevent my access to the courts in violation of clearly established law, the first amendment.

247. "A Government official's conduct violates clearly established law when, at the time of the challenged conduct, '[t]he contours of [a] right [are] sufficiently clear' that every 'reasonable official would have understood that what he is doing violates that right.'" *Werkheiser v. Pocono Twp.*, 780 F.3d 172, 176 (3d Cir. 2015); *Citing, Ashcroft v. al–Kidd*, 131 S.Ct. 2074, 2083, 179 L.Ed.2d 1149 (2011) (quoting *Anderson v. Creighton*,483 U.S. 635, 640, 107 S.Ct. 3034, 97 L.Ed.2d 523 (1987) (all alterations in original)). "In determining whether a right has been clearly established, the court must define the right allegedly violated at the appropriate level of specificity." Id. Citing, *Sharp v. Johnson*, 669 F.3d 144, 159 (3d Cir.2012).

248. The Defendants obstruction of my access to the courts and retaliation against me for seeking to petition the Court concerning civil rights is clearly violating my First Amendment rights to petition the court.

249. "The opportunity to be heard is an essential requisite of due process of law in

judicial proceedings" *Richards v. Jefferson County*, 517 U.S. 793, 798 n.4 (1996).

250. I wrote a letter to directed to the Honorable Chief Justice Collins J. Seitz, Junior of the Delaware Supreme Court ("Chief Justuce") under the suggestion of Mark Vavala, a former commissioner, and agent of the Delaware Bar Association, seeking a waiver of attorney registration fees during the pandemic, as the pandemic prevented me from working at my old law firm. See US Exhibits US Ex-Ex A-4 and US Ex-Ex-A-5, and District Court Exhibit 13, the January 7 letter where I made my request for exemption of fees.

251. On February 2, 2021, the court sent a letter indicating:

> "The Court acknowledges receipt of your letter dated January 7, 2021, wherein you request that the attorney registration fees for lawyers out of work due to the pandemic be waived. Attorneys wishing to have an assessment fee waived must file a formal request. The Cort will take each request under consideration as received and act appropriately." Citing, the letter contained in US Ex-Ex-A-5.

252. On February 5, 2021, I responded to the Court's February 2, 2021 letter in part:

> "…is accepting applications for waivers on a case by case basis violates the Equal Protections Clause applicable to the states agencies, even the courts via the 14th Amendment, 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 lawyers 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 olicies based on the love of money, desire for money, at the cost of driving out the love for humanity, the people the state serves…" US Ex-Ex-A-5

253. I paid the filing fees for my active attorney license to practice law on February 6, 2021 in the amount of $353.00, since no relief was granted by the court, per my request. See US Ex-Ex- A-5.

254. After such fees were paid, De-Lapp, a disciplinary arm of the court, so tied with the government it is considered a government agent, reached out to me offering to allegedly help, in the attached, May 24, 2021 attack letter.

255. In the May 24, 2021 Carol Waldauser and Eleanor Kiesel state, "We understand that you are experiencing some financial difficulties with regard to license fees."

256. They did not reach out to me to offer economic help since such fees were already paid, but to connive to gather evidence to retaliate against me, punish me, for my exercise of my first amendment rights.

257. Two people knew of my request to suspend attorney license fees, the Delaware Chief Justice Collins J. Seitz, Jr. ("Chief Justice") and Mark Vavala.

258. I filed *Appellant's motion for the Delaware Supreme Court to reign in its arms through its agents unlawfully pressuring Appellant to forgo or impede her case to protect her free exercise of religion by relief it deems just*, dated May 25, 2021, with the Delaware Supreme Court, with no relief from the Court. US Ex-Ex A-4.

259. I filed *Appellants Motion for the Delaware Supreme Court to require the recusal of the Honorable Chief Justice Collins J. Seitz*, dated May 28, 2021, with the Delaaware Supreme Court, with no relief from the Court. US Ex-Ex-A-5.

260. It appeared the Chief Justice may have contacted the ODC, since Mark Vavala appeared to prove he was not the one who told about my fee waiver request.

261. Since only two people appeared to know of my request, and one of those two appeared to make a complaint to the arm of the court, DE-Lapp, recusal should be required of the Chief Justice in *Kelly v Trump*.

262. A judge should not interfere with a party's case, my case or intimidate a party,

intimidate me, or give the appearance of interfering or intimidating a party, me, before his court with knowledge that such interference would violate my First Amendment rights, my right to petition, exercise of speech, association and exercise of religion, based on my exercise of my right to petition the court to address grievances, including but not limited to the right to petition the Court for exemptions for attorney fees, the right to petition for relief from the arms in its charge to prevent an unfair trial, and the right to petition the court against grievances in *Kelly v Trump*.

263. It is the right to petition for relief without government retaliation that must be protected, not the guarantee that such relief will be granted. It is the opportunity at justice that must be protected and not taken away based on retaliation for the exercise of the right to petition, not taken away based on the exercise of speech, religious beliefs, or association, or even based on poverty, and the lack of resources an attorney advocate would ordinarily have if she should be representing a party, or even errors, or mistakes.

264. Perfection is not a requirement for an American to have the right to petition.

265. My speech concerning my beliefs and faith in Jesus may appear crazy to others, and yet even unpopular beliefs are protected. *Cantwell v. State of Connecticut*, 310 U.S. 296, 60 S. Ct. 900, 84 L. Ed. 1213 (1940). Nevertheless, I have the freedom to believe by the dictates of my conscience, no matter what the government through its agents believes. See *Matthew* 6:1-5. Also see, *State ex rel. Tate v. Cubbage*, 210 A.2d 555, 557, 1965 Del. Super. LEXIS 67, *1, 58 Del. 430, 433, ("It is no business of courts to say that what is a religious practice or activity for one group is not religion under the protection of the First Amendment. Nor is it in the competence of courts under our constitutional scheme to approve, disapprove, classify, regulate, or in any manner control sermons delivered at religious meetings."); See, *Africa v. Pennsylvania*, 662 F.2d 1025, 1025, 1981 U.S. App. LEXIS 16448, *1, (3d Cir.), cert. denied, 456 U.S. 908, 72 L. Ed. 2d

165, 102 S. Ct. 1756 ("It is inappropriate for a reviewing court to attempt to assess the truth or falsity of an announced article of faith. Judges are not oracles of theological verity, and the founders did not intend for them to be declarants of religious orthodoxy. However, while the truth of a belief is not open to question, there remains the significant question whether it is truly held. Without some sort of required showing of sincerity on the part of the individual or organization seeking judicial protection of its beliefs, the U.S. Const. amend. I would become a limitless excuse for avoiding all unwanted legal obligations."); *Burwell v. Hobby Lobby Stores, Inc*., 573 U.S. 682, 682, 134 S. Ct. 2751, 2759, 189 L. Ed. 2d 675, 680, 2014 U.S. LEXIS 4505, *1. ("Courts have no business addressing whether sincerely held religious beliefs asserted in a RFRA case are reasonable."); *Employment Div., Dept. of Human Resources of Ore. v. Smith*, 494 U. S. 872, 887, 110 S. Ct. 1595, 108 L. Ed. 2d 876 (1990). ("Repeatedly and in many different contexts, we have warned that courts must not presume to determine the place of a particular belief in a religion or the plausibility of a religious claim."); *Presbyterian Church in U. S. v. Mary Elizabeth Blue Hull Memorial Presbyterian Church*, 393 U. S. 440, 450, 89 S. Ct. 601, 21 L. Ed. 2d 658 (1969) (holding that "the First Amendment forbids civil courts from" interpreting "particular church doctrines" and determining "the importance of those doctrines to the religion."); *Ben-Levi v. Brown*, 136 S. Ct. 930, 934, 194 L. Ed. 2d 231, 235-236, 2016 U.S. LEXIS 991, *10-12. See, *Holt v. Hobbs*, 574 U.S. 352, 352, 135 S. Ct. 853, 856, 190 L. Ed. 2d 747, 747, 2015 U.S. LEXIS 626, *1, 83 U.S.L.W. 4065, 93 A.L.R. Fed. 2d 777, 25.

266. I am allowed to think differently instead of being conditioned to worship as the state's forced will of materialism, pursuit of money, and unholy charity that damns people to hell per Jesus, such as fundraising or organized charity. Jesus teaches people "have their reward," meaning they have no reward, no eternal life from God. Matthew 6:1. I believe organized charity,

fundraising, pro bono, and volunteering is no small sin. It is not true charity, but damns people to hell by teaching business, giving out of one hand to get out of another, is love. Love is unconditional. Business is not the sin. Teaching business is charity is the sin by driving love, God, out of the hearts of men replacing it with the love of money. Jesus teaches you cannot serve God and money. I choose God.

267. I believe churches taking government money to perform business on behalf of the government per the executive orders I sought to eliminate in *Kelly v Trump*, under the guise of charity mislead people to hell as they harm others on their way should they not repent, by teaching business is love, driving out love ("God," since "God is love"), from the hearts of men replaced with the love of money or material gain. Jesus taught, do not give charity seen like the hypocrites who will have no reward from the father, meaning they will be damned to hell, without eternal life. When you give do not know your left hands from your right, meaning do not give to get, no matter how slight, in the form of favors, tax breaks or marketing, and your "father will reward you in secret," meaning you will escape being thrown into the fire to be no more on judgment day.

268. My personal beliefs and speech relating to those beliefs do not make me disabled.

269. I believe people go to hell for trusting in what mental health employees and healthcare employees sell.

270. I have religious objections to mental health care and healthcare.

271. As stated in my writ of certiorari and in a Motion to the Delaware Supreme Court, "…I informed the DE Supreme Court of some of my religious objections to alleged healthcare…I certainly hope this Honorable (Delaware Supreme) Court did not instigate the abuse by its arms. If so, please desist. 26. DE-LAP was looking after its own interests, which conflicts from mine. 27. I am a Christian. I believe people go to hell for trusting in what psychologists, mental health professionals, psychiatrists and behavioral theorists teach, which often is focused on being happy or productive materially instead of being holy. The organization premises its existence on mental health theories which I believe harm people. I believe such theories teach patients to seek to fulfill their own material desires instead of doing what is right, thereby teaching people to reflect a little piece of hell

> on earth, the image of Satan by living for self, conditionally caring based on relationship, reward and avoidance of harm with no sacrificial unconditional love or God in them, teaching a lie that damns. See Isaiah 14 to understand how Satan wanted to be his own God, as high as God, to place self-first. I believe their thinking misleads patients to hell, especially B(F) Skinner's theories, which most teachers, including myself learned. 28. These mental health professionals focus on misleading people to feel good, not be good, which is not good. I believe it is evil, misleading those they exploit for a paycheck to harm and hell." See, Ex US, Petition."

272. Carol Walhauser created the appearance of a threat by her comment requiring a response within ten days.

273. I have the freedom to chase after God's will instead of chasing after money.

274. I have the freedom to pursue my religion by justice in the courts to protect my freedom to worship by the dictates of my free will, not the forced will, not the dictates of the state through its agents to worship money, as savior, which I believe leads to damnation in hell.

275. I believe business greed, and conditionally caring based on relationship, reward and avoidance of harm, without any unconditional love, is the mark of the beast. Jesus teaches you cannot serve God and money. *Matthew* 6:24, 1 *Timothy* 6:10. I stand by God.

276. Defendants' attacks against me in retaliation against me, made me cry as I relived the retaliation against me based on my petitioning the court for help by another arm of the Delaware Supreme Court who economically persecuted me to protect those with a shared interest.

277. This is not the first time the arm of the Delaware Supreme Court retaliated against me for exercise of my right to redress grievances with the government.

278. When I took the Delaware Bar, I stayed in a dorm at Widener Law School as I took the Delaware Bar, my ceiling leaked and caved in destroying my bar material. I requested replacement bar material. I waited a week or two, and then complained to either the Board of Bar Examiners or the Court.

279. An official in charge of the Bar at Widener, a partner with the Board of Bar

examiners yelled at me for making him look bad.

280. I received bar materials, but a complaint was filed against me for asking help, delaying my admission to the Delaware Bar.

281. I passed the Delaware Bar on the first try, during the summer of 2006.

282. After my name was listed as passing, I was offered multiple jobs.

283. On November 20, 2006, I accepted an offer by Richards, Layton and Finger ("RLF") on a year contract for $135,000, a year. District Court Exhibit 14.

284. The Board of Bar examiners indicated my admission to the Delaware Bar would be delayed pending psychological examinations.

285. In 2006, some of my peers wrote recommendations for me, or reached out to me, including Travis Turner who confirmed that I was not disruptive or even noticeable at the bar review course located at Widener Law School, and Chip and Dan O'Brien, who also attended the Bar review courses. District Court Exhibit 15.

286. Many other people have vouched for my good character by drafting letters of recommendations, including but not limited to Judge Leah Chandler and Mr. George Cole, the longest serving Delaware politician who served in one seat, attached hereto and incorporated herewith, as District Court Exhibit 16.

287. I told RLF my admission would be delayed.

288. On or about December 11, 2006, I filed a complaint in the Delaware Supreme Court for the Board of Bar Examiners to show cause. District Court Exhibit 17.

289. My law firm, RLF, required I withdraw my complaint to keep my job, and required I comply with the Board, which violated my religious belief.

290. The Board required I undergo psychological examinations, which violated my

religious belief as I believe psychologists and mental health professionals will go to hell along with those they treat by seeking to bend people's free will to conform to the desired will of the world by giving into temptations of desires instead of laying down desires to do God's will. District Court Exhibit 18.

291. Under threat of loss of job, I sinned against God by complying, making a counselor more money, and faced anxiety, embarrassment and emotional distress for violating my religious beliefs while being insulted and humiliated by examination of psychologists, who behaved as Satan, acting as God determining if my free will conformed with the dictates of the evil world.

292. I believe mental health specialists, behavioralists like B. F. Skinner, and psychologists teach the mark of the beast and will be damned to hell, as they mislead others, including their patients there with them, should they not repent and be saved with the truth.

293. I believe Mental health counselors, behavioralists and psychologists teach people to conditionally care based on feelings, relationship, reward and avoidance of harm, based on desires, not laying down desires to love God and one another.

294. Please note, Jesus teaches most people will go to hell. See *Luke* 13-28, *Matthew* 7:13-15, also see *Isaiah* 10:22, only a remnant of Israel is saved from destruction in hell the last day. Wide is the way to destruction, meaning many different thoughts, action and inaction may forever damn people to hell, should they not repent, be made clean and saved by truth in love, instead of lusts, making.

295. I become licensed to practice law in Delaware, but RLF did not renew my contract.

296. I regret listening to RLF, a business concerned more about making money and their business appearance relating to me.

297. Where false accusations arise in retaliation for complaints against authority,

reputations may be tarnished to conceal mistakes and misbehavior by those in power as the Board of Bar examiners did to protect their private partner at Widener Law School, and as the Defendants are doing towards me in retaliation for my petitioning the Court for relief. See, *Acts* 24:5, Paul was called a troublemaker for shining light on evil, on sins, just like Jesus was persecuted for shedding light on darkness, sins, in hopes to transform darkness into light. As I hope the courts choose to do in all cases, repenting when they make mistakes, reflecting the image of God by saving not only lives, but eternal lives too by love and correction to prevent condemnation, instilling hope "70 times 7." *Matthew* 18:22.

298. I regret listening to a superior at RLF, instead of doing what was right by standing up for myself as I am a child of God, not man's to exploit for material gain or for conditioning my will to conform to the will of the world's for the convenience of others.

299. If I was still working at RLF, I would have made well over two million dollars by now.

300. I was a nervous wreck as I was examined under the microscope of people who desired their own convenience, money or prestige, not the desire to safeguard my individual liberties, including the right to petition for grievances against the Board of bar examiners partners at Widener, and my right to freely worship my religion without government agents substantially burdening my free exercise of religion to the forced, compelled exercise of their will, similar to now, making me relive painful experiences.

301. Prior to that in law school at Duquesne School of Law, I had rats in my apartment the last semester and during bar exams. I complained to those in authority and was similarly punished by them for asking for help.

302. Duquesne, a Christian Law School responded by blaming me and hiking up the

rent, just like the Board of Bar Examiners and the Defendants responded to my petitions for relief by retaliating against me and punishing me.

303. The press helped me by putting me on TV and the newspaper, but no actual relief resulted, only harm. I was freaked out and emotionally exhausted. There was a bunch of baby rats trying to climb up my bed as I tried to get sleep. I was horrified. I did not pass the Pennsylvania Bar on the first try. I got super high scores the second time and allegedly high scores in Delaware passing the Delaware bar on the first try. I should not be ashamed. I was disappointed in the cold heartedness by the officials of a Christian law school. Please see Exhibit 19 Duquesne, a CD where I saved a file to be opened as a file not as a CD, of a news clipping where newscasters tried to help me. Also see, District Court Exhibit 20, a newspaper article where the news reporter tried to help me.

304. The Defendants retaliation for my petitions, and their attacks against me, made me relive the horrors of other times I asked for help, and got in trouble for asking for help, like I am in trouble, for asking for help now, except this time I am in even greater harm.

305. I have been a nervous wreck as this experience is traumatic, going through it alone, with little resources or help. My heart has been hurting pretty badly.

306. The government threats by Delaware government officials, Judge Clark, De-Lapp, ODC, Patricia and Defendants conspiring to seek to suppress my free exercise of religion, speech, association, and right to redress grievances, under the facts of the case., but for my petition for grievances violate the First Amendment applicable to the Defendants pursuant to the Fourteenth Amendment, and caused emotional distress.

307. The threats continued. On August 23, 2021, the ODC attached a letter to an Email, which I have not received by US mail, signed by Defendant Patricia B. Swartz, stating:

> "This Office has reviewed several pleadings you have filed in the Court of Chancery and the Supreme Court in connection with the law suit *Meghan Kelly v. Donald Trump*. The content of these documents raise serious concerns as to your mental fitness to practice law… Therefore, the ODC requests you voluntarily submit to a mental health examination to determine your fitness, and mental capacity to practice law. This Office has scheduled an examination with Joseph C. Zingaro, PH.D., located at 1129 Airport Road, Milford, DE 19963 on Tuesday September 7, 2021 from 1:00 p.m. to 4:00 p.m. If you do not submit voluntarily to the above referenced examination, the ODC will petition the Board to order such an examination." District Court Exhibit 21.

308. I responded to the ODC's E-mail dated August 23, 2021:

> "Desist in contacting me to interfere in my case. No, I will not be evaluated. I have religious opposition to mental healthcare and healthcare. Do not interfere with my case any further. I am trying to file a writ of cert as we speak. Stop impeding justice, to bend my freedom of conscience to your will. My belief in Jesus may appear to be crazy to you, but my freedom to believe as I choose is a protected right, same as the… right to an unobstructed trial. Desist in contacting me." District Court Exhibit 22.

309. I rushed to the law library to file my writ of certiorari to the United States Supreme Court relating to *Kelly v Trump* the same day, August 23, 2021, with some errors, under great duress, since I believed the August 23, 2021 letter was meant to discourage and distract me from appealing the Delaware Supreme Court's determination before the United States Supreme Court.

310. I tried to get on the internet at the law library, after I electronically filed, and my lab top stopped working, that day, August 23, 2021.

311. I filed *Kelly v Trump* case as an injured party, not as an attorney.

312. I am not practicing law at this time, and do not expect to practice law, until my case is over and the pandemic subsides when it is safer.

313. I filed as an aggrieved party, despite my poverty and lack of resources for expenses such as a phone, working computer, gas, printing, paper, and legal tools, because standing up for my free exercise to worship God without government sponsored suppression was and is risking mistakes.

314. I am scared for my life. People have been killed based on perceived government-religion and government-religious beliefs.

315. I live in a pro President Trump area, where some people see him as God's anointed, and see me as a "demoncrat." or antichristian, since I do not support former President Trump, and because I am a democrat.

316. Someone talked about shooting me based on stickers I had on my car that indicated "No one is above the law. No one is below the law," and "Impeach," to impeach former President Trump.

317. Someone actually threw a substance all over my car and stickers.

318. An out of state stranger, proclaiming to be from Maryland, took off his mask and yelled at me, while getting uncomfortably close, accusing me of supporting President Biden. I feared he was potentially subjecting me to covid19. I did not know how an out of state stranger knew I did not support President Trump. I thought it might have been because I proposed five separate articles to impeach former President Trump on and contacted all 541 federal members of congress concerning the articles.

319. I have been visibly shaken up by the court's attacks and interference in *Kelly v Trump* particularly Arline, Judge Clark, DE-Lapp, and now ODC based on my exercise of speech, religion, association and petition.

320. Seeking to trivialize my requests to be free from retaliatory behavior by government officials for exercise of my right to petition, freely speak, exercise religion and associate, by demeaning my character as mentally unfit for the practice of law, is an improper purpose for the ODC to interfere in an active case regarding fundamental rights, with no important justification.

321. The ODC intentionally threatened me with the August 23, 2021 letter to interfere

with my appeal, by distracting me, causing alarm, in retaliation for the exercise of my speech, religion, association and right to petition the court.

322. The ODC knew or should have known *Kelly v Trump* was an active case, and that conspiring to interfere with a party in an ongoing case to obstruct justice is unlawful as violating the First Amendment applicable to the Defendants pursuant to the Fourteenth Amendment, thereby eliminating qualified immunity.

323. According to the US Supreme Court Docket relating to *Kelly v Trump* 21-5522, my petition is not even going to be distributed for conference until October 29, 2021, the last business day. District Court Exhibit 23.

324. There was no great threat to an important government interest, narrowly tailored to address such interest, that justified the ODC's conspiracy to interfere with my active case that justified infringing upon my fundamental right to access to the courts.

325. In fact, there is little government interest the ODC has other than to destroy my reputation and credibility, based on my speech, religion, association, which at times is critical of government agents.

326. Qualified immunity does not shield Patricia, and the Defendants since (1) the official, Patricia, and Defendants violated a statutory or constitutional right(s), and (2) the rights were clearly established at the time of the challenged conduct.

327. I was so upset, on August 28, 2021 I E-mailed Patricia, Mr. Zigaro, and Ms. Burskirk,

> "This email is to confirm, I will not be evaluated, as such evaluations violate my religious beliefs. I alerted the US Supreme Court to the same in my petition for the writ of cert., relating to emotional damages related to the President's conduct. Desist impeding in my access to the courts without government obstruction and retaliation for my exercise of my first Amendment rights. I am an injured party, not an attorney practicing in this case. A Court staff member sought to sabotage my case by misleading me to almost miss the filing

> deadline to appeal the Master's final report, dated November 2, 2020. That same staff member instructed me to cross off the civil process clerk's address on a praecipe to impede the case from going forward. That member objects to my religious association beliefs in support of Trump and government agents exercise of religion while governing. Judge Clark also sought to interfere with my case. Government and court attacks against a party in an active case to impede justice, based on my case, is inappropriate and unlawful.
> I do not seek disciplinary recourse at this time should this arm of the Supreme Court and other members of the government refrain from persecuting me based solely on exercise of my Constitutional rights based on religion, association or poverty.
> Thank you" Delaware District Court Exhibit 24.

328. On September 27, 2021, Patricia and the ODC again threatened to take action to place me as inactive, disabled attorney status, in retaliation against me for the exercise of my First Amendment right to free speech, to freely exercise my religious belief, association and to petition the government for redress of grievances and in direct violation of the First Amendment right to petition the government. District Court Exhibit 25

329. In the attached letter, incorporated herein by reference as an exhibit, District Court Exhibit 25, dated September 27, 2021 Patricia and Defendant wrote:

> "By letter dated August 23, 2021, this Office advised you of its concerns regarding your fitness to practice law. As such, the Office of Disciplinary Counsel requested you voluntarily submit to an examination with Joseph C. Zingaro, Ph.D. You declined and the examination has been canceled. I am writing to notify you, pursuant to Procedural Rules 9(b) and 19(c) of the Delaware Lawyers' Rules of Disciplinary Procedure, that on Wednesday, November 3, 2021, this Office will present to a panel of the Preliminary Review Committee ("PRC") a petition to transfer you to disability inactive. You may, if you choose to do so, send a written statement to this Office for submission to the PRC. Any such written statement must be received by this Office no later than the close of business on Tuesday, October 26, 2021. If we do not receive your submission by the deadline, it will not be sent to the PRC in advance. This matter is serious, and you should consider retaining counsel." District Court Exhibit 25.

330. I sought relief from the court for protection against government retaliation for my free exercise of religion, speech and association, only to my shock to be persecuted for the same by retaliation by the defendants for the exercise of my fundamental rights.

331. This is a traumatic for me to ask for help only to be penalized, as a result of my

petition.

332. The Defendants behavior would deter a person from continuing their lawsuit, despite the fact it did not stop me, albeit it shook me up and caused me to rush with more mistakes.

333. The fact that I am undeterred from the exercise of my constitutional rights does not eliminate the right to a fair trial without government attacks. *See, Mirabella v. Villard*, 853 F.3d 641, 650 (3d Cir. 2017).

334. Per *Adams v. Ross Twp*., No. 2:20-CV-00355, 2021 WL 972520, at *5 (W.D. Pa. Mar. 16, 2021),

> "The Third Circuit has held that '[w]hether an act is retaliatory is an objective question.' (citations omitted) To determine whether an act is retaliatory, a court therefore assesses 'whether the act would deter a person of ordinary firmness, not whether the plaintiff was deterred.' (citation omitted) As the *Mirabella* Court explained, there is good reason for this objective rule: Government officials should not be rewarded for "picking on unusually hardy speakers'"

335. The Defendants conduct would objectively deter a party from continuing suit, which I brought to prevent government suppression of my religious exercise, free speech and fundamental right to associate, while maintaining my individual liberties, including the right to redress grievances in a court of law.

336. Defendants, under the color of statutes and the law sought (seek) to deprive me of rights, privileges and immunities secured by the Constitution and laws, including my freedom to worship by the dictates of my conscience without government suppression and persecution, free exercise of association, free exercise of speech, and the right to redress government grievances in Court without outside government persecution by those wielding government power, and my active license to practice law.

337. 42 USCS § 1983 specifically affords injunctive relief against Defendants' conduct,

seeking to penalize me for the exercise of my Constitutional rights because my religious beliefs, speech or association are repugnant to government actors, or they disagree with my speech, or seek to hide or conceal it or diminish my character as a means to persuade others not to listen to my speech.

338. It is unconstitutional to conspire to impede access to the courts and to impair a fair trial, as defendants have done.

339. I hope my old law firm still will hire me back to perform real estate settlements, in spite of the fact I am standing up for my unpopular religious beliefs.

340. The Defendants conduct seeking to place me on inactive disability status would prevent me from gaining employment with my old law firm or other firms, causing irreparable harm to my reputation, my livelihood, and my quest to serve God by proposing just laws and policies to care for people, not exploit or oppress people to serve artificial entities without hearts who run on money and conditional labor, with no power to do good, as I believe only individuals can reflect the image of God by unconditional love.

RELIGIOUS BELIEFS

341. My personal religious beliefs are in issue. So, I am providing additional facts concerning my religion, and my beliefs.

342. I am a Christian.

343. I believe in God, the Father.

344. I believe in God the son, Jesus Christ.

345. I believe in God the Holy Spirit.

346. I believe that God loves me and all of humanity so much that he reveals himself in three different ways, the Father, the son, Jesus, and the Holy Spirit, to shed light, to guide us to

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

347. I believe we all are empowered to choose to accept or reject God, to accept God in our hearts, or harden our hearts to God's love and salvation from the final death through God's teaching us the way of love leading to eternal life.

348. I find guidance in Jesus, the Word made flesh.

349. I find guidance in the Holy Spirit.

350. I find guidance in God, the father.

351. I find guidance in the Bible.

352. 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.

353. In fact, I believe the root of corruption in both business and government is serving those who serve you, thereby serving yourself, instead of the people you are supposed to serve. (Also see, *Matthew* 20:26 and *Mark* 10:43, Jesus says, '"whoever wants to become great among you must be your servant"'); (Also see, *Luke* 22:26, Jesus teaches, '"But you shall not be like them. … (T)he one who leads like the one who serves.")

354. I believe living for self, and your own family, your own community and for those who affect, serve and benefit you, thereby living for self, without regard to others reflects the image of Satan. (Please see, *Isaiah* 14:13-14, Satan wanted to live for himself. He wanted to be his own God, to be as high as God. Satan did not want to lay down his life for God, by in part, loving others as himself, even outsiders, even the least of these.); (See *Genesis* 3:1-6, Satan tempted Eve to be like her own God too, allegedly "knowing good from evil," to reflect the image of Satan, instead of placing God first by obeying God. God loves her and desired to prevent harm

towards her. The command was for her benefit, like the commands are for our benefit to teach us the way through love to escape death. She died.); (Please see, 2 *Corinthians* 4:4, and the Book of Job, Satan the lower case “god of this world” has authority to confuse humanity, through people, desperate conditions and the worldly desires, to teach people evil is good and good is evil. So, folks will be damned to hell for their misunderstanding.); (See *Matthew* Chapter 13, Only those who understood were not burnt up to be destroyed. Misunderstanding may eternally kill you.); (Also see, *Matthew* 4:1-11, Satan tempted Jesus to live for self too. Jesus did not give into the temptation but lived to serve, God and humanity by being the light of the way to eternal life); (Also see, *Ezekiel* 16;49, People will be damned to hell for their unconcern "they did not help the poor and needy."); (Also see *Matthew* 13:18-19 "the worries of this life, the deceitfulness of wealth and the desires for other things come and choke the word, making it unfruitful," meaning those people will be burnt up in hell.); (Further see, *Luke* 17:26-34 where Jesus also gave us examples of people merely caring for their own family and their own needs, working, buying and selling, eating and drinking, marrying and given into marriage before they were destroyed to be damned to hell for giving into tempting distractions of making money and making merry, and, or the anxieties of life while failing to understand the true purpose of life and eternal life, loving God and loving others as yourself, not exploiting others, outsiders to serve your greed); (Also see, *Matthew* 7:21 "Only those who do the will of God, go to heaven.); (Also see, *Matthew* 16:24, *Luke* 9:23, *Matthew* 10:38, and *Mark* 8:34, regarding true followers must stop doing what they desire to do, and do what God desires instead. Loving others even if it is painful.)

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

356. I believe people sin against God when they merely serve their own children and families, and those who serve or affect them, instead of all the people they are appointed to serve in their position of life.

357. I believe the Defendants sin against God when they look after their own interest, the interest of the reputation of the Delaware bar, or money, instead of the people they are charged to care for.

358. Artificial entities without hearts, like the ODC, per se, reflect the image of the devil, by absence of love, running on conditional labor, regardless of whether they are paid or not, or money, based on conditional collective entity interest with no power to do good by reflecting the image of God by unconditional love.

359. People withing the entities such as the ODC, are stronger than the conditional conformed will of the whole, since they have free will, to think, to care, to love unconditional, beyond the organizations', conditional existence, and conditional collective will, not free will.

360. The members within the such as the DOC, and Delaware Bar association have a conflicts of interest which tempts them to reflect the image of the devil by placing self-first, their collective, conditional uniform interests first, reputation of partners, the courts, their salary, their families, their colleagues, their convenience, or their reputation above doing what is correct by examining facts impartially, and by intentionally or recklessly impeding my case with intent to obstruct my case and with intent to punish me for their disagreement with my speech, association, religious beliefs and requests within my petition, unlawfully violating the First Amendment applicable to Defendants pursuant to the Fourteenth Amendment. Satan wanted to be as high as God, not leading by sacrificing to self to serve God foremost and one another, as self. Isaiah 14.

361. Over the years, I have recognized that the members of the bar organizations sections

tend to look at proposed laws with the mind set of what will be easier for lawyers, what will bring lawyers more money with less work, what gives lawyers more freedom, less regulation, instead of doing what is right by looking to care for the best interest of the people we are charged to serve upon acceptance of work, real estate settlements or cases.

362. This inherent conflict of interest of self-first mindset, of members or partiality towards perceived partners, even the courts, within our professional organizations, collectively diminishing the free will of individual members to a conditioned will to form across the board professional standards, stifling innovation created by something more valuable than money, the minds of the individuals. So professional standards guarantee worse for consumers, and harsh penalties towards professionals who care to use their conscience mind to care for consumers outside of the standards, stifling free debate to improve, by the forced will of professional standards.

363. Individual liberties are lost to artificial entities without hearts and souls who exist based on conditional labor, not unconditional love and money.

364. Defendants have a conflict of interest to hide misbehavior and misconduct by their partners, the courts, instead of upholding the impartiality of the courts and preventing abuse by allowing government agents to knowingly or with reckless disregard impede justice in my case and punish me based on my religious beliefs, association, poverty, even as a destitute attorney, and my petitions for relief to protect my free exercise of religion without government suppression, to protect my right to petition without government obstruction, or punishment based solely on those rights, and to protect my right to petition the court for relief, suspension of attorney filing fees.

UNEMPLOYMENT-HEALTHCARE-RELIGIOUS BELIEFS

365. I have religious beliefs that governed my choice not to work the past two years.

Over the past two years, I proposed articles of impeachment and shed light on unjust laws to prevent condemnation in hell and harm here.

366. I believe justice in the courts is a command by God. *Amos* 5:15. Justice in the courts is a greater law, superseding laws merely related to monetary and material laws, per Jesus the Christ. *Matthew* 23:23.

367. I believe justice is guiding people to know they are loved, respected as worthy of life, unconditionally, unearned, required by God, and to care about others, unearned, unconditionally, or get corrected in court for exploiting, harming or oppressing others to serve your own by the love of money or otherwise.

368. The Bible teaches ignorance, blindness and dumbness, not knowing of the harm and oppression towards others, is guilt worthy of condemnation in hell, per God, should people not repent. See, e.g. *Hosea* 4:6 "My people are destroyed for lack of knowledge: because thou hast rejected knowledge, I will also reject thee…." See, *Matthew* 13, Only those with understanding were not destroyed. See, *Isaiah* 56:10, "Israel's watchmen are blind, they all lack knowledge; they are all mute dogs, they cannot bark; they lie around and dream, they love to sleep." Also see, *Matthew* 15:14, "Leave them; they are blind guides. If the blind lead the blind, both will fall into a pit."

369. I believe courts have the power to safeguard life here, and eternal life by justice through correction, guiding, not condemning, instilling hope "seven times seven," and alleviating wrongs that hurt people for business greed, not good. *Matthew* 18:22. I believe Courts disobey God when they judge people as God, making themselves God, by discouraging hope and repentance, and by encouraging wrong doers to hide evil allowing it to fester and spread, instead of rebuking wrong doers out of love in hopes to transform them into right doers, potentially

preventing harm here, and damnation in hell for eternity.

370. Many of our laws and policies reward evil as good. I sought to prevent injustice guaranteed to safeguard life and eternal life by taking time to propose just laws, policies and to draft articles of impeachment for God, not money, without pay.

371. Whenever the Bible says "woe to you," I understand that to mean, damned to hell are you should you not repent by unhardening your head, heart and hands, by reflecting love, not absence of love for others unconditionally, not based on relationship, reward or avoidance of harm.

372. God in *Isaiah* 10:1, teaches "Woe to those who make unjust laws, to those who issue oppressive decrees." Meaning, law makers will be damned to hell for unjust laws despite potentially not knowing and compromising evil for good should they not be corrected by courts or otherwise.

373. I tried to propose laws over the past two years to congress, and proposed articles of impeachment to prevent oppressive decrees, that harm people, and damn law makers to hell. I believe compromise is injustice guaranteed, and is wrongly praised as good.

374. I believe the courts can balance the other two branches by giving guidance and removing unjust decrees that make us less free by violating not only the Constitution but God's law of love too. I believe the Courts analysis of the laws to determine their unconstitutional impact may save otherwise "twice dead" law makers from hell and harm here. *Jude* 1:12

375. The Bible teaches people go to hell for not knowing, misunderstanding, confusion. 2 *Corinthians* 4:4, also see Matthew 13. Courts have the power to help them know and be a life saver and eternal life saver by guiding those misguided by desires back to laying down selfish desires to care to love one another as themselves per just decrees.

376. I took time off to serve God, without pay, by drafting articles of impeachment, and

to propose other legal solutions to alleviate or prevent foreseeable harm without pay. I filed *Kelly v Trump*, C.A. No. 2020-0809-PWG (Del. Ch. Nov. 2, 2020), in the Delaware Chancery Court to serve God and safeguard my God's name as holy because I love God, and seek to worship him without government sponsored burdens and persecution. If I was working, I would not have been able to file the law suit, as it would likely turn business away from my employer.

377. Secondly, I have religious reasons related to the pandemic for not working. I am a Christian. I believe people go to hell for prescribing and accepting our harmful health care. Since we are in a global pandemic, I am seeking to avoid getting sick, to avoid being damned to hell by forced healthcare that may kill my life and eternal life. I actually wanted to go back to my old law firm, and was negotiating for a position, but the pandemic hit. And, I decided it was not worth the risk of losing my life and eternal life at this time, should the law firm still be interested in me in light of my unpopular beliefs as a believer in Jesus the Christ.

378. I have religious objections to healthcare and studied the history of horrors of healthcare in a class at UD. I believe more evil is done by health care professionals and mental healthcare professionals than any other industry, even the military, because of the deception that they save lives only to destroy lives and destroy eternal lives in the second death for money. The fact doctors and nurses were doing what the industry and the professional standard told them to do across the line, does not prevent harm or sadly, I believe, their damnation in hell for not seeking to know, and for failure to repent of hardness of hearts for cold hard cash.

379. Just laws are a way to prevent health care workers from damnation in hell by eliminating unjust laws that reward wrong doing, making it profitable to use people as test dummies or as human commodities for profit, or providing comfort care making people feel better instead of be better.

380. When I was young at UD, I remember learning that charities used people as test dummies in Africa, under the guise of healing them to only harm patients by causing cleft palates. Then, the same wrong doers used the alleged shield of charity or not for profits to gain monetary interests by marketing, fundraising or tax breaks to correct the harm they caused by using people as lab rats, essentially selling patients' souls for money while behaving like devils, unknowingly or not, by teaching the lie they seek to help people, only to harm them for business greed.

381. I observe the same wrongs continued. Pharmaceutical entities who have paid out money in law suits may still be rewarded some of the roughly 33 billion a year in NIH fundings. People within entities, investors or otherwise, are permitted to make money off of the alleged cure too, despite judgments against them, through their entities which shields them from personal concern or responsibility. Injustice continues. I believe money is not the solution. Just laws and justice in the courts is the solution.

382. I believe our forced industry system, stemmed in a forced market by money, grants, donations to colleges or entities market, backed by professional standards accepted by the court across the board stifles innovation and improvements than an otherwise free market would create. Our current system eliminates free will, by the forced, conditioned, controlled will of those who buy or barter for the government official's partiality through donation, praise or otherwise, making everyone else no longer free, but for sale in a take it or leave it economy.

383. I believe nurses and doctors are still damned to hell for not knowing treatment causes harm. Preventing their punishment for straying from the standards to use their free will, their brain, to think, to care, to know, to love those they serve, safeguarding patients above pockets, is a just policy. Also protecting those the court is correcting by preventing injustice guaranteed by relying on professional associations which per se, value the bottom line more than humanity. Since

associations run on the bottom line, unable to reflect the image of God by love.

384. HIPPA protects profit, not patients, as attorneys cannot easily obtain nonparty medical records to show that doctors knew or should have known of the harm or potential harm to patients. Guiding health professionals through correction, not condemnation in court by hefty monetary damages, will prevent future harm to patients and may save healthcare workers' souls by teaching them to use their own brain, free will, to care to know, to better care for the patients they are charged to serve.

385. I also believe healthcare professionals sin by taking the life blood, or organs from people to perform studies on or to use on other patients. See, Leviticus 17:14, Genesis 9:4-5. I only realized this recently as I looked into sinister tests of blood for wicked gain, not good. See, https://www.bbc.co.uk/bbcthree/article/347828f8-6e7f-4a9b-92ab-95f637a9dc2e

386. I believe testing blood is sin. I also believe people go to hell for cremation or for grinding up bones. So, I do not eat things with gelatin or gel cap medicine in them. By cremating bones people show they do not care to know God or love God. God teaches our loved ones are not in heaven or thrown into the fire of the second death yet. The bible teaches about the resurrection of the bones with a potential new body to be judged for eternal life or the second death. See, e.g. *Revelation* 20:13, *Ezekiel* Chapter 37, *Matthew* 25:32-46. Many self-proclaimed Christians sadly adopt this pagan belief that the dead are already in heaven and hell. That is not what God, the father, Jesus, the son, or the holy spirit teach. It is an eternally deadly error to teach lies as truth, to give comfort in a lie, without repentance. Throughout scripture we learn people are damned to hell for adding to scripture or getting it wring should they not correct themselves. Yet the watchmen are damned to hell for failing to share truth too. I know God. I am placing my life and eternal life on that partial, not yet complete knowledge of God.

387. When I was young, I had surgery that exacerbated my allergies, and made me weaker. I had one ovary removed. Every month I still have my period, but I lose five pounds of water weight, and must eat, drink, work out and get more rest to be okay.

388. In law school, my doctor wrote a note for me so I could eat while I took my exams. So, I wouldn't get dizzy or faint.

389. It has not been a problem for most of my life because prevention by eating more and drinking more water is pretty simple, but I may faint if I am dehydrated and hungry, during my period, which does not make me disabled. It makes me human in need of gallons as opposed to glasses of water, and additional care during a week of every month when I lose five pounds of water weight like clockwork each month.

390. All the doctors I saw when I was young had no problem sinning against God by prescribing medicine that made me worse, like throwing noodles at the wall to see if something would stick. God will throw people into hell for harming my body or harming any body to serve their salaries. The Bible teaches God will destroy those who destroy God's temple, should they not repent. We are God's temple. 1 *Corinthians* 3:16-17.

391. My personal experience is why I studied healthcare history in a course at UD, and focused on healthcare finance and healthcare law in a couple of courses. Our healthcare kills more than it heals, harms, and I believe damns people to hell forever by masking pain inhibiting people's free will, ability to think clearly, preventing them from choosing to do God's will, damning them guaranteed should they die drugged up or in a medicated coma.

392. When I ran for office, I proposed changes to improve healthcare. See US Ex-Ex-43.

393. I ran as a democrat and democrats, disagreed with me by wanting more care, which meant more bad care since funding is more easily gained by using people as test dummies for new

or different treatments, not necessarily better.

394. In 2018, two democrats in the healthcare field were selected to run, both I have high regards for. Yet, it is disturbing we are in a pandemic, I think by design. I believe our state Treasurer, a beautiful brilliant drug representative and our state Auditor a brilliant gifted speaker, a pharmacist were chosen, especially since our Treasurer's dad was the head of the Republican party in Sussex County, and Colleen Davies, our treasurer, ran as a democrat.

395. I discussed my disagreements related to healthcare in the US-Ex-, the law suit against the Democrats before the pandemic hit. Fancy out of state democrats became in state residents and became involved in helping President Biden and forming healthcare agendas within my district the 38th District and Sussex County, Delaware.

396. The World Economic Forum founder's books allude to very disturbing healthcare and military goals in his books which appear to be happening before our eyes to serve greed not good.

397. I have other objections to healthcare beyond what I write here. In the *Fourth Industrial Revolution*, written by the founder of the world economic forum's founder, other wicked schemes are proposed to harm life and human life under the guise of DNA improved healthcare. Schemes were shared in his book back in 2016. Since Bill Gates, a partner to the World Economic Forum is assisting in vaccines, I fear people are being exploited as lab rats for experiments that may harm them without protections in the form of the rule of law to require caring for patients, and correction if harm results. Instead, our laws allows and rewards hiding of wrongs, and rewards ignorance and not knowing, as knowledge is tied to culpability. So, it is sadly discouraged.

398. I oppose healthcare and mental healthcare examinations per the Defendants requests on religious grounds.

399. I have religious objections against even physical examinations for trial or for routine check-ups by doctors who provide data, conclusions, as if they are God, or statistics for research money or for pay, which violate my beliefs concerning being numbered as data. See, 1 *Chronicles* 21:1, 1 *Chronicles* 27:24, *Samuel* 24:1, King David sinned against God for using his men as commodities, as mere numbers, not capable of reflecting the divine image of God, but to be used for war or wealth. Distinguish this from our use of the census, which must be used to care for, not exploit humanity for profit, I hope at least.

400. I am a child of God, priceless, not a price tag, to be sold for money. I am not a human commodity to examine, to exploit for business greed by being a statistic or number.

401. I believe our current healthcare destroys lives and eternal lives to serve wealth, not good. Please see my proposals to change our healthcare laws to care for people, not exploit them for profit. US Ex-Ex 43.

402. Drugging up the sick and elderly in hospitals is their damnation in hell guaranteed should they die, with their faculties inhibited. *Ecclesiastes* 7:1, *Matthew* 24:13, *Ezekiel* 3:17-21. I believe you must use your mind, your brain, to think, to care to know, to love to be saved from certain doom. *Deuteronomy* 30:19, *Sirach* 15:11-20.

403. I also receive food benefits, which I should have applied for before the pandemic. So, my costs for food are reduced. I had planned to go back to my old law firm, and did not ever think of myself as poor. I was foolish since welfare by government law unearned is required even in the bible, as I am required to care for my body since I am God's, not my own. *Exodus* 23:11, *Nehemiah* 10:31 relating to cancel debts. In *Matthew* 6:12., Jesus means cancel monetary debts to prevent people from being tempted to the way of hell by making money their savior, in place of God, as God.

404. I am unemployed and not receiving unemployment compensation. There is no shame in applying for food benefits when one is eligible and in need. Maybe I need to be brought as low as possible to lift up others in need, to show the world those in need should not be ashamed despite people, (including some of my former high school schoolmates), misbehaving by shaming people receiving food stamps. I have behaved like a knucklehead for not applying for food stamps until after a global catastrophic emergency hit.

405. I have also attended the drive through food-pantries and shared the food with my neighbors. I cannot eat most of the food since I am a vegetarian with allergies.

406. I believe government funded policies that care for those in need without requiring indentured servitude such as volunteering, or work are biblical. Government policies lifting up those in need unconditionally, without enslaving them, by requiring they pay it back or pay it forward, reflect love, by respecting the dignity of human life, unearned, free. Under our Constitution, I believe this freedom is required, otherwise oppression is guaranteed in the form of exploiting desperate conditions, violating the Thirteenth amendment. U.S. Const. amend. XIII.

407. I believe government funded policies that care for those in need without requiring indentured servitude such as volunteering, or work are required by God in secular laws. Government policies lifting up those in need unconditionally, without enslaving them, by requiring they pay it back, by volunteer work requirements, or pay it forward, reflect love, by respecting the dignity of human life, unearned, free. Under our Constitution, I believe this freedom is required. Otherwise, oppression is guaranteed in the form of exploiting desperate conditions for entities and individuals to get as much as they can for as little as the can, violating the Thirteenth amendment, and violating God's laws by unjust gains. U.S. Const. amend. XIII. See. *Proverbs* 1:19, 15:27, 28:8, *Habakkuk* 2:9, 2:12, *Ezekiel* 22:12-13, 22:27, *Isaiah* 56:11,

Jeremiah 6:13, *Psalm* 10:3, *Isaiah* 5:8 "Woe to you who add house to house and join field to field till no space is left and you live alone in the land."

408. Even in the Bible, there is welfare. See, *Exodus* 23:11. Every seven years farms are required to lay fallow. So, those in need could pick up the crops to live off of in the years to come, without owing anything to the landowner.

409. While the Food bank still exploits the needy by forced volunteers, requiring volunteers, and requiring people to pay for a driver's license and transportation instead of directly helping people, not through entities, it is not those in need who sin. It is those who exploit them for profit and praise who sin, such as the farms and donors who gain tax breaks for donating, as well as marketing or the praise of men. (See, *Matthew* 6:1-4. I believe organized charity, fundraising, bake sales, car washes, selling girl scout cookies, pro bono, and forced work, forced volunteering leads to exploitation and many to lose eternal life in hell, by driving out love from the hearts of men replaced with business greed, the mark fo the beast.)

410. I believe little school children are taught and tempted to go the way to hell young, should they not repent, by praise for their unpaid child labor to fundraise for schools or sports and corporate and other profit, conditioning them to sin against God later in life by giving donations to politicians and artificial entities without hearts such as churches, charities, not for profits and businesses, who have no power to do good.

411. I believe only individual humans can do good by reflecting the image of God by loving others unconditionally. *Genesis* 1:27, "God created mankind in his own image.," *Colossians* 3:10, Cf, the image of the beast, by absence of God, by absence of unconditional love, *Revelation* 13:15, "the image of the first beast.," See, 1 *John 4*:16, "God is love.," 1 *Corinthians* 13:4-8 "love… is not self-seeking…" I believe Jesus when he teaches people will

be damned to hell for their unconcern, what they failed to sacrifice materially to those in need, directly, without worldly reward or recognition, Godly reward for a worldly loss. *Matthew* 41:46.

412. In *Matthew* 6:1-5, Jesus teaches people will be damned to hell, have no reward for organized charity, fundraising or charitable events. Such deceptive false charities is business, not true charity, giving out one hand and to get something out of the other, such as tax breaks, recognition, marketing, good will, favors, money, material gain, praise connections or something else.

413. Organized charity is business, even the business of controlling the markets by philanthropy to private entities, politicians and donations to schools for required conformed studies to support planned manufactured markets, not based on freedom or the free will of individuals to innovate, instead the bought, tempting compelled willed by those with money, power, connections or influence to purchase a manufactured market.

414. Artificial entities without hearts, like churches, charities, businesses, not for profits, associations, organizations and other entities, run conditionally on money and conditional labor, not unconditional love, and those who work or organize under them exercise a conditioned will focused on the entities' conditionally interest, eliminating their free will to love unconditional by such conditional restraints.

415. I also believe people go to hell for failing to forgive monetary debts. *Deuteronomy* 15:1 ("At the end of every seven years you must cancel debts."), *Deuteronomy* 15:2 ("This is the manner of remission: Every creditor shall cancel what he has loaned to his neighbor. He is not to collect anything from his neighbor or brother, because the LORD's time of release has been proclaimed."), *Jeremiah* 34:14, *Matthew* 18:21-35, *Matthew* 6:12,14,15,

Proverbs 21:13. I love people, and do not want people to go to hell by requiring I pay them unjust debt I cannot afford.

416. I am single, and my parents are recovering from covid in Florida. Everyone around me seems to be struggling with the increased cost of living, food, gas, paper, ink, postage or other commodities.

417. During the past two years, I suspended my drivers' insurance and rode my bicycle because I could not afford car insurance.

418. My parents have helped me with money given I listed as a gift, without interest, that I will pay back if and when I am able, on my Motion to file in forma pauperis.

419. My parents will forgive the debt as Jesus requires if I am not able to pay them back, in order that they and I not sin against God, per God's laws.

420. They may not be able to help me much longer, since the economy is pressuring them too.

421. My parents were infected with covid-19 in September 2021. My parents are now negative for covid-19, but are still recovering from covid19 lingering effects. They both received two vaccines and wear masks.

422. However, my father teaches school teach in Florida where students are not required to wear masks. So, the spread of covid-19 is not as contained by those who choose not to wear masks in the schools.

423. They both are old and tired. I hope the lingering symptoms related to blood cuts and clots that block blood from carrying oxygen to vital organs, causing organ shut down and covid toes do not harm them. Viruses may stay dormant in the body. Covid19, like the flu is quickly morphing, meaning vaccines and pills will have little results in preventing the spread due

the quick mutations of these type of viruses. Masks on the other hand, reduce the spread. I am scared they may die soon, though they now test negative.

424. I am asking the Court in a Motion, filed contemporaneously with this Complaint, and will ask the defendants if they would be willing to receive communications via email, and participate in court electronically, stipulating to a waiver of paper pleadings and postage, due to reducing the risks of spreading covid-19, and also due to the obstacle driving to upper Delaware to the US District Court for the District of Delaware's court house would cause me as costs increase for food, gas, ink, paper, and other things. I may suspend my car insurance again, due to inability to pay.

425. I am also filing contemporaneously herewith a motion to participate in appearances and proceedings remotely to reduce the increased risks of contagion during this plague and to reduce costs for all parties during this planned, preventable hyper-inflation the globe is experiencing relating to gas, postage, paper, ink and other items.

426. I have severe allergies that mimic covid, causing diarrhea and other unpleasant symptoms, sometimes severe anaphylactic shock, closing of my throat, wheezing, dizziness which cannot avoid, as allergy medicines worsen not alleviate my symptoms. I live alone, and must perform yard work as I have no money to pay for others to help me, and neighbors complain instead of assist.

427. Though, I test myself probably too often and am negative for Covid-19, I would prefer to reduce the chances of sickness and death if allowed by this Honorable Court and permitted by the Defendants.

428. When I first drafted my law suit in the Chancery Court related to *Kelly v Trump*, I did not have a working computer or a printer. My parents kindly bought me a computer down the

line, but it broke twice. My printer broke three times before it completely broke. I recently bought a new one, with no idea how I will afford ink. I do not even have a working phone at this time. I have a fire in my belly to stand up for something more important than a job or money, I am standing up for God, and my life, my reputation, and my livelihood. Just laws and justice glorify God. Seeking justice in courts is a command based on love for one another, and mercy, not money. I gave my life to God, not to monetary gain, not to the false God of money.

429. I choose to fight for my faith, to exercise my belief in Jesus Christ without government suppression of my speech, substantial burdens on my associations and substantial burdens on my free exercise of living my faith, by doing the will of God, even if I do not know how I will get by each day. I choose to have faith.

430. I was denied access to Del Tech's scanner to scan in the voluminous amount of exhibits. I apologize I was unable to create a CD for the Court and Defendants with reduced number of scans as an exhibit to this Complaint.

COUNT I-DEFENDANTS RETALIATION AGAINST ME FOR THE EXERCISE OF MY FIRST AMENDMENT RIGHT TO PETION FOR GRIEVANCES BASED ON MY EXERCISE OF CIVIL RIGHTS IN VIOLATION OF THE FIRST AMENDMENT APPLICABLE TO THE DEFENDANTS PURUSANT TO THE FOURTEENTH AMENDMENT-INJUNCTIVE RELIEF

431. Meghan Kelly incorporates by reference all of the preceding and subsequent paragraphs as if fully recited herein.

432. Defendants acted in retaliation against me, by initiating proceedings to place my license to practice law on inactive disabled, but for the exercise of my First Amendment right to free speech, to freely exercise my religious belief, association and the right to petition the

government for redress of grievances and (2) in direct violation of the First Amendment right to petition the government.

433. The adverse action was `sufficient to deter a person of ordinary firmness from exercising his First Amendment rights.'" *Jacobs v. Beard*, 172 Fed. Appx. 452, 455 (3d Cir. 2006) (citing *Allah v. Seiverling*, 229 F.3d 220, 224-25 (3d Cir. 2000)).

434. Defendants continue to retaliate against me based on my First Amendment exercise of the right to petition, speech, associate and exercise my religious beliefs. I face irreparable injury to my free exercise of speech, association, religion, right to petition, reputation, pecuniary harm, and a substantial burden to work as an attorney, or anywhere else, should this Honorable Court not enjoin the Defendants.

435. My protected activity, exercise of my First Amendment Right to petition the court for grievances, speech, association and exercise of religion, "was a substantial factor in the alleged retaliatory action." *Blevis v. Lyndhurst Bd. of Educ*., 2009 WL 3128402 at *5 (D.N.J. Sept. 28, 2009) (citing *Hill v. Borough of Kutztown*, 455 F.3d 225, 241 (3d Cir. 2006). The "first prong is a legal query, and the second prong is a determination of fact. " *Hill*, 455 F.3d at 241.

436. Defendants face no threat of irreparable injury by an injunction.

437. Defendants' retaliation against me for the exercise of my First Amendment Right to petition for grievances based on civil rights in violation of the First Amendment applicable to the Fourteenth Amendment would cause irreparable injury to others. I seek to use my voice to prevent the elimination of social security, to prevent the elimination of private ownership or real property per the world economic forum founder's plan, prevent the elimination of the 47 percent of the jobs in the US, including lawyers, and to prevent an economic crash by

recommending changes to the banking system, proposing similar Executive orders that Presidents Lincoln and Kennedy passed that would divert the planned elimination of the dollar and economic crash, and to prevent other harms. My reputation would be tarnished, diminishing my speech from being considered, should Defendants be permitted to punish me, to retaliate against me for the exercise of my Civil rights. Other people would suffer.

438. I stood up for children at the border, the NFL players freedom to speak, associate and protest, and the freedom of the press. I intend to continue to use my voice, to help the oppressed, particularly the baby boomers and elderly.

439. In addition, the public would be harmed by the precedent a denial of this motion would create which would allow Government agents to initiate or continue proceedings to deem those who disagree with the government or think or believe or associate differently than a government organization's agent's compelled will, to be labeled mentally disabled or disabled, but for their diverse beliefs, and speech reflecting such diverse beliefs, chilling the public's exercise of their free will and constitutionally protected speech, belief, association, and petitions for grievances against Government conduct.

440. Defendants have no important or necessary interest in taking away my active license to practice law in response to my exercise of Constitutionally protected rights, narrowly tailored to such interest which outweighs the interest in the exercise of my First Amendment rights.

441. I am not representing any person, nor am I planning on representing anyone in the near future. I have not worked as an attorney advocate in years. I pose no risk to nonexistent clients or the public. I seek to safeguard the public and humanity from those who would harm them to serve business greed. I hope to get a position back with my old law firm

performing real estate settlements, as the pandemic subsides which will not likely be anytime soon.

442. I discovered, I hate trial work, but I love God. So, I chose to stand up for my religious belief in Jesus Christ by filing *Kelly v Trump*, even if I am the only one. I should not be punished by government agents for my strongly held, individual religious beliefs, even if those beliefs are repugnant and conflicting to those strongly held beliefs of government agents, even the courts.

COUNT II-DEFENDANTS OBSTRUCTION OF JUSTICE AND RETALIATION AGAINST ME FOR THE EXERCISE OF MY FIRST AMENDMENT RIGHT TO PETION FOR GRIEVANCES BASED ON SEEKING RELIEF FROM ATTORNEY LICENSE DUES OR BASED ON KELLY V TRUMP, TO IMPEDE, OBSTRUCT, HARASS OR PRESSURE ME TO FORGO MY LAW SUIT, KELLY V TRUMP OR TO GATHER EVIDENCE AGAINST ME TO PUNISH ME FOR EXERCISING MY PROTECTED RIGHT TO PETITION FOR GRIEVANCES IN VIOLATION OF THE FIRST AMENDMNET APPLICABLE TO THE DEFENDANTS PURSUANT TO THE FOURTEENTH AMENDMENT AND IN VIOLATION OF 42 U.S.C. § 1985 (2)(b) or 42 U.S.C. § 1983.

443. Meghan Kelly incorporates by reference all of the preceding and subsequent paragraphs as if fully recited herein.

444. I participated in Constitutionally protected conduct by petitioning the Court to exempt attorney license fees for attorneys facing hardship and unemployment due to the pandemic, and by petitioning the Court for relief in *Kelly v Trump*.

445. Defendants conspired with De-Lapp, an arm of the Delaware Supreme Court by taking adverse action against me, a threatening letter requiring I respond within ten days, allegedly based on that conduct of petitioning the Court for grievances for either my request or bringing the law suit *Kelly v Trump* with intent to punish, retaliate, harass, interfere, or pressure me to forgo my lawsuit in *Kelly v Trump*, in conspiracy with Defendants, and Judge Clark, in violation of 42 U.S.C. § 1985 (2)(b) and/or to gather information to be used by Defendants to retaliate against me by bringing an ODC complaint against me, but for the exercise of my protected conduct, petitioning the Court for relief related to attorney dues, or petition the courts for relief in *Kelly v Trump*, in violation of the First Amendment applicable to the Defendants pursuant to the Fourteenth Amendment.

446. Defendants conspired by seeking to initiate additional investigations and examinations against me as evidenced by the August 23, 2021, and September 27, 2021 letters to punish, retaliate, impede, interfere or cause me to forgo an ongoing case in *Kelly v Trump* in violation of my First amendment rights applicable to the Defendants pursuant to the Fourteenth Amendment, and pursuant to 42 U.S.C. § 1985 (2)(b) and 42 U.S.C. § 1983.

III. DEFENDANTS OBSTRUCTION OF JUSTICE AND RETALIATION TO SPEECH, ASSOCIATION AND EXERCISE OF RELIGIOUS BELIEFS IN VIOLATION OF THE FIRST AMENDMENT APPLICABLE TO THE DEFENDANTS PURUSANT TO THE FOURTEENTH AMENDMENT-INJUNCTIVE RELIEF

447. Meghan Kelly incorporates by reference all of the preceding and subsequent paragraphs as if fully recited herein.

448. Defendants retaliated against me by seeking to punish me by taking away my paid for active license to practice law, to harm my reputation, to hide government mistakes and

misbehavior I sought to address or to punish me based on my religious beliefs, constitutionally protected speech, association, or poverty in violation of the First Amendment applicable to the Defendants pursuant to the Fourteenth Amendment.

COUNT IV-INTENTIONAL OR RECKLESS INFLICTION OF EMOTIONAL DISTRESS CAUSED BUT FOR DEFENDANTS INTEREFERENCE AND RETALIATION AGAINST ME FOR MY EXERCISE OF MY CIVIL LIBERTIES

449. Meghan Kelly incorporates by reference all of the preceding and subsequent paragraphs as if fully recited herein.

450. I "(1) (have) in fact suffered emotional distress, embarrassment and/or humiliation, and (2) defendant's actions, proximately caused my injuries." *Aumiller v. University of Delaware*, 434 F. Supp. 1273, 1977 U.S. Dist. LEXIS 15317 (D. Del.).

451. I will continue to suffer emotional distress, and likely financial distress should Defendants not be enjoined from instigating proceedings to retaliate against me for the exercise of my first Amendment rights in violation of those rights applicable to the Defendants pursuant to the Fourteenth Amendment.

V. OBSTRUCTION OF JUSTICE BASED ON PROTECTED SPEECH, RELIGION, ASSOCIATION OR PETITIONING THE COURT

452. Meghan Kelly incorporates by reference all of the preceding paragraphs as if fully recited herein.

453. Defendants intimidated me, a party in the *Kelly v Trump* law suit, conspiring with two or more people to threaten, influence, hinder, impede, obstruct, defeat me from bringing *Kelly v Trump*, denying me, a citizen, equal protections of the laws, based on poverty, religious beliefs,

free exercise of speech or association, injuring me economically, seeking to take away my livelihood, while seeking to suppress my exercise of religion, speech, and right to seek grievances in court in violation of 42 USCS § 1985 (b), by threatening me with Defendants' letters dated August 23, 2021 and September 27, 2021.

454. The Defendants, interfered with, impeded, obstructed my access to the courts or threatened to take away my license to practice law, but for my law suit to protect my free exercise of religion, association and speech under Equal protections of the law, as a class of one, in an attempt to impede an active law suit that is before the United States Supreme court as of this date, based on my exercise of a right as a party, not acting as an attorney, safeguarding protected religious associated beliefs and speech in violation of the First Amendment applicable to the Defendants pursuant to the Fourteenth Amendment.

COUNT-INJURY TO REPUTATION CAUSING ME TO LOSE SIGNIFIGANT EMPLOYMENT OR ASSOCIATED OPPORTUNITIES, SPEECH,

452. Meghan Kelly incorporates by reference all of the preceding paragraphs as if fully recited herein.

453. Injury to reputation itself is not a deprivation of liberty or property. Paul v Davis 424 US 693 (1976). However, Governments acts so injure my reputation that I will lose significant employment or associational opportunities, including my ability to practice law in the state of Delaware as a result of Defendants malicious punishment based on their disagreement of my protected Constitutional beliefs, speech, association and/or petition(s).

PRAYER FOR RELIEF

WHEREFORE, Meghan Kelly respectfully requests that this Honorable Court:

1. Enter an Order to permanently enjoining and restraining Defendants from punishing Meghan Kelly for exercise of her first amendment right of speech, religion and association, and access to the courts as an aggrieved party.

2. Enter an Order awarding Plaintiff attorney fees pursuant to 42 USC 1988, should she retain an attorney, and costs, and possibly **damages** emotional distress, to the extent authorized by law and other such relief as the Court deems proper and just, if applicable.

Dated: _____ Respectfully Submitted,

/s/Meghan Kelly

Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
Pro se, not attorney

Bar Number 4968

Exhibit E

(Email to Supreme Court regarding swearing in violates religious belief, sadness years later when Court disregarded my request to affirm for disobeying Jesus Christ)

From: Meg Kelly <meghankellyesq@yahoo.com>

To: "Jeannie.Balke@state.de.us" <Jeannie.Balke@state.de.us>
Sent: Tuesday, February 21, 2012, 03:10:13 PM EST
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' by 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 mispelled 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 F

THE SUPREME COURT OF THE STATE OF DELAWARE

In the Matter of a Member of the Bar of the Supreme Court of the state of Delaware Meghan M. Kelly, respondent.	)))	Supreme Ct. No. 58, 2022 Misc. 541, Board Case No. 115327-B

Respondent's Meghan Kelly's Motion to be excused from the notary and affirming requirements in Delaware Court pleadings

Respondent Meghan Kelly respectfully requests to be excused from the notary and affirming requirements in Delaware Court pleadings.

1. On May 4, 2022, the Chancery Court adopted a new rule, Rule 178B ("New-Rule"), which requires notarizations of Chancery Court pleadings, without exception for declarations for indigents who "proceed in forma pauperis" and persons adjudicated disabled to "terminate [such disability adjudication] in favor of less restrictive measures." (See, attached Exhibit A)

2. The ODC seeks to adjudicate me disabled to compel government incited restrictive means in retaliation for my exercise of fundamental rights in violation of the First and Fourteenth Amendments. US Amend I, XIV.

3. I am an indigent who would be required to proceed in forma pauperis in the Chancery Court, the Court of equity, to lift any restrictions upon my license to practice law, or other restrictions, should the Delaware Supreme Court adjudicate me disabled, but for my religious-political beliefs, contained in my

petitions in violation of the First and Fourteenth Amendment Equal Protections Clause. US Amend I, XIV.

4. It is against my religious beliefs to swear by notarizing Court pleadings.

5. It appears this Court has made a determination on my case, before granting me an opportunity to be heard, while colluding with the Chancery Court below, by requiring indigents and those deemed or alleged mentally disabled to notarize petitions, without exception for declarations. The Court appears to pass this New-Rule to intentionally create an obstacle, targeting me selectively, to prevent me from exercising the right to petition in the Chancery Court to lift any restriction the Delaware Supreme Court may adjudicate upon me or my active license to practice law.

6. The Chancery Court and this Court had notice it is against my religious beliefs to notarize by swearing in by *Kelly v Trump*, 21-0809 and 21-119, *Kelly v Democrats*, 2020-0157. (See attached Exhibits B-C); (Also see, Objn-Ex-N, internal Exhibit 3 to Exhibit 6, DI 43).

7. The new Chancery Court requirement conflicts with federal law, 28 U.S.C. § 1746, and our Constitution which specifically allows for affirmations or declarations.

8. The original 1787 text of the Constitution of the United States makes three references to an "oath or affirmation": In Article I, senators must take a special oath or affirmation to convene as a tribunal for impeachment; in Article II, the president is required to take a specified oath or affirmation before entering office; and in Article VI, all state and federal officials must take an oath or affirmation to support the Constitution. Another reference appears in the Fourth Amendment, which specifies that all warrants must be supported by evidence given under oath or affirmation.

9. Though U.S. presidents are free to either swear or affirm the inaugural oath of office, I am aware of only one president who has chosen to affirm. The nation's 14th president, Franklin Pierce, affirmed the oath upon his March 4, 1853 inauguration. (https://en.wikipedia.org/wiki/Franklin_Pierce). I applaud his conduct for keeping religion and state separate so as not to use God's name or the name of religion for political vanity. *Exodus* 20:7

10. The right not to swear in stems from an old England case, determined on December 1678, trial of William Brayn. (Attached as Exhibit D)

11. It is against my religious beliefs to affirm too. I am a Christian. God teaches us not to promise, affirm or swear, as our lives are not our own, but God's, not man's, to own by compelled debt in exchange with Constitutional exercise of fundamental rights. See, 1 *Corinthians* 6:19.

12. Debt is against my religious beliefs. See, *Romans* 13:8. I believe those who create artificial debt sin and will be cast in the fires of hell for requiring people to pay for what is not theirs to sell, including freedom. Yet, if they repent by cleaning their hearts, they will have eternal life in heaven. I believe their sins will be remembered no more by God.

13. Declarations, affirmations and oaths violate my religious beliefs. I am a Christian. I read the Bible for guidance. Jesus teaches "do not swear, let your yes be yes and your no be no. Everything else is from the evil one." *Matthew* 5:35-37.

14. In the Old testament of the Bible, two dads got themselves into trouble for disobeying God by making promises, affirming or swearing in the bible. One father promised God if everything goes well with his aim, he would sacrifice the first thing that greeted him at home. *Judges* 11:30-31. Expecting life stock, the man greeted his daughter, and sacrificed her under the guise to God, but in reality, for his own sinful pride to keep his word. It would have been better not to sacrifice her. It is written "God desires mercy not sacrifice." *Matthew* 12:7, Hosea 6:6, *Isaiah* 1:11-17.

15. A second father got into trouble got into trouble for disobeying God by stating anyone who breaks a fast will be killed. His son ate honey, not knowing about the fast. The dad violated a more important command, to protect his

appearance and pride, which is a greater sin. 1 *Samual* 14:27. It is my religious belief dads and all people should not make material oaths to keep their bond or word. It is better to break their promise, than to sell the souls of their children or their own soul for material gain, which makes my heart have great sadness. These two dads misbehaved. We should not promise under penalty or debt. My word should suffice, based on my religious beliefs. I request that I, individually, no longer be required to affirm or swear to pleadings before the Delaware Courts.

16. God teaches I am a temple. I am not my own. I am not to make oaths, affirmations, or declarations that may make man or money my master as creditor. See, *Matthew* 6:24. 2

17. I fear you may cause injustice if I do not sign the declaration, but I request the Delaware Supreme Court excuse me from the requirement in all courts, herewith, including the Delaware Chancery Court. Injustice is a greater sin. I must seek justice with mercy faithfully to obey Jesus. *Matthew* 23:23.

18. The state has an important interest in determining the truth, but removing the obligation that compels me to violate my religious belief in exchange to exercise the right to defend my exercise of fundamental rights, is not the least restrictive means in my case. I fear God, and do not require the threat of punishments to speak honestly. The Court must grant an exception for me in order

not to compel me to violate my religious beliefs in exchange with permission to exercise a fundamental right.

Wherefore, I pray this Court grants my motion, and relieves me of affirming and notarizing documents by signing the attached order.

June 6, 2022

Respectfully Submitted,

Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
Unrepresented indigent party,
Bar No. 4968
(Words 1, 137)

I declare and affirm that the foregoing statement is true and correct under the penalty of perjury.

Dated: June 6, 2022

Meghan Kelly (printed)

(signed)

Exhibit A

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

IN RE: ADDITION OF NEW RULE 178B TO THE COURT OF CHANCERY RULES, SECTION XVII

This 4th day of May 2022, IT IS HEREBY ORDERED that the Court of Chancery Rules, Section XVII, are revised to add new Rule 178B, effective immediately.

Rule 178B is added as follows:

Rule 178B. Unsworn Declarations under Penalty of Perjury in Certain Guardianship Matters.

Pursuant to Section 3927 of Title 10, the use of an Unsworn Declaration under Penalty of Perjury is hereby authorized for pleadings or papers filed in guardianship matters, except for those listed below. Unsworn Declarations under Penalty of Perjury may be used in lieu of verifications, sworn declarations, affidavits, and notarized signatures that are otherwise required on pleadings or papers. An Unsworn Declaration under Penalty of Perjury may not be used with any of the following: petitions seeking to appoint a guardian for adults with an alleged disability or to appoint a guardian of property for a minor, to remove a guardian and/or appoint a successor guardian, and to add a co-guardian; physician's affidavits, and personal information sheets filed by petitioners related to those petitions; petitions to terminate a guardianship due to recovery of the person with a disability or to terminate in favor of less restrictive measures; petitions for instructions regarding life-sustaining procedures; consents filed related to those petitions; petitions to transfer funds at majority in guardianships of a minor's property; and applications to proceed *in forma pauperis*. The Chancellor may further limit the use of Unsworn Declarations by Order or Administrative Directive.

Creating Petitioner an additional burden in terms of cost for those who may not be able to afford it.

FOR THE COURT:

/s/ Kathaleen St. J. McCormick
Chancellor Kathaleen St. J. McCormick

Exhibit B

21-1490/21-3198 Fw: Swearing in verses affirming the reason why courts now say swear or affirm Fw: Sponsor for the United States Supreme Court

From: Meg Kelly (meghankellyesq@yahoo.com)

To: zi-xiang.shen@delaware.gov; david.weiss@usdoj.gov; meghankellyesq@yahoo.com

Date: Thursday, May 5, 2022, 10:11 AM EDT

I saw the new rule requiring in forma pauperis and mentally disabled to notarize with no exception for religious beliefs sent to all lawyers yesterday. The Chancery Court read about this twice in my complaint against Donald J. Trump and a second time in Kelly v democrats. They knew this. I am disappointed.

----- Forwarded Message -----
From: Meg Kelly <meghankellyesq@yahoo.com>
To: Johnson Karlis P (Courts) <karlis.johnson@delaware.gov>; Dolph Lisa (Courts) <lisa.dolph@delaware.gov>; Meg Kelly <meghankellyesq@yahoo.com>
Sent: Thursday, May 5, 2022, 10:08:24 AM EDT
Subject: Swearing in verses affirming the reason why courts now say swear or affirm Fw: Sponsor for the United States Supreme Court

Do you see how the Chancery Court Order violates my faith in Jesus.

----- Forwarded Message -----
From: Meg Kelly <meghankellyesq@yahoo.com>
To: "Jeannie.Balke@state.de.us" <Jeannie.Balke@state.de.us>
Sent: Tuesday, February 21, 2012, 03:10:13 PM EST
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' by 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 mispelled 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
>

Family Court Doc1.doc
471.5kB

Exhibit C

Swearing in verses affirming the reason why courts now say swear or affirm Fw: Sponsor for the United States Supreme Court

From: Meg Kelly (meghankellyesq@yahoo.com)

To: karlis.johnson@delaware.gov; lisa.dolph@delaware.gov; meghankellyesq@yahoo.com

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> Meg Kelly, Esq.
> 34012 Shawnee Drive
> Dagsboro, DE 19939
>
> 302-537-1089
> Licensed DE, DC & PA
>
> DE Bar # 4968
>

Family Court Doc1.doc
477.5kB

Family Court Doc2.doc
270kB

Exhibit D

William Brayn.
Theft: animal theft.
11th December 1678

Reference Number t16781211e-37

Verdict Not Guilty

Related Material Associated Records

Cite this text
Old Bailey Proceedings Online (www.oldbaileyonline.org, version 8.0, 04 June 2022), December 1678, trial of William Brayn (t16781211e-37).

Actions | Print-friendly version | Report an error Close

Navigation < Previous text (trial account) | Next text (trial account) >

William Brayn Indicted, for that he, the 6th. of Septemb. 1678. did steal one Gelding, colour brown , from Ambros Galloway . He pleaded Not guilty, and put himself upon the Countrey.

William Brayn, for stealing a Gelding from Ambros Galloway; against whom

One testifi'd his knowledge, that it was Ambros Galloways Horse; and another, that he bought it of the Prisoner. But Ambros himself, being a Quaker, would not, for Conscience-sake, as he said, swear, and so could give no testimony about his losing him. Upon which the Court directed the Jury to find the Prisoner Not guilty for want of Evidence, and committed the Quaker, as a concealer of Felony, for refusing an Oath to Witness for the King.

That William Brayne, is not guilty .

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Footer

Version 8.0 | March 2018

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EXHIBIT G

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?

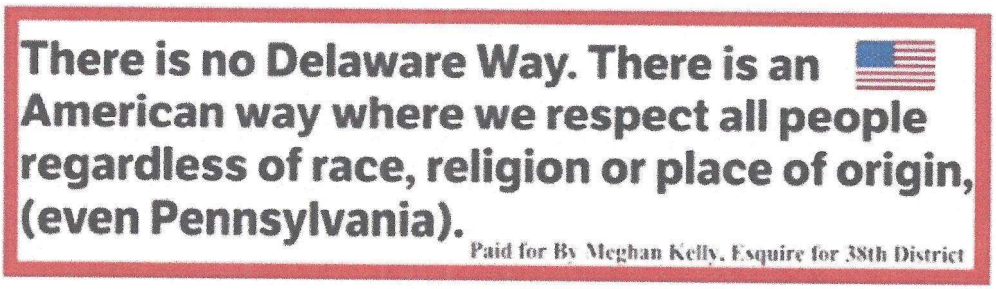
Thank you for being a good role model and for making a positive impact on Delaware attorneys and Delaware Courts, and thank you for considering my comments.

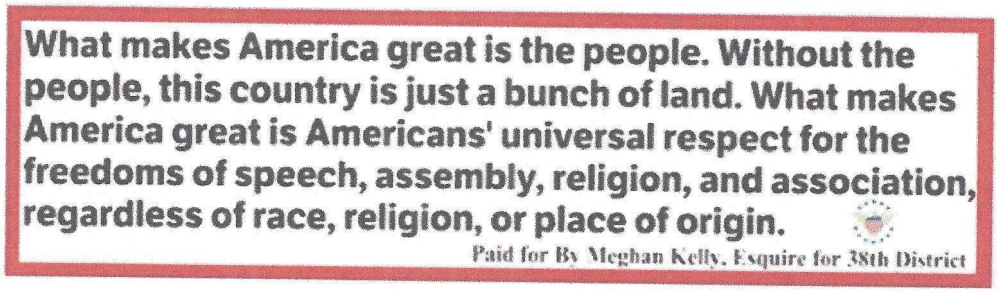
Have a good week.

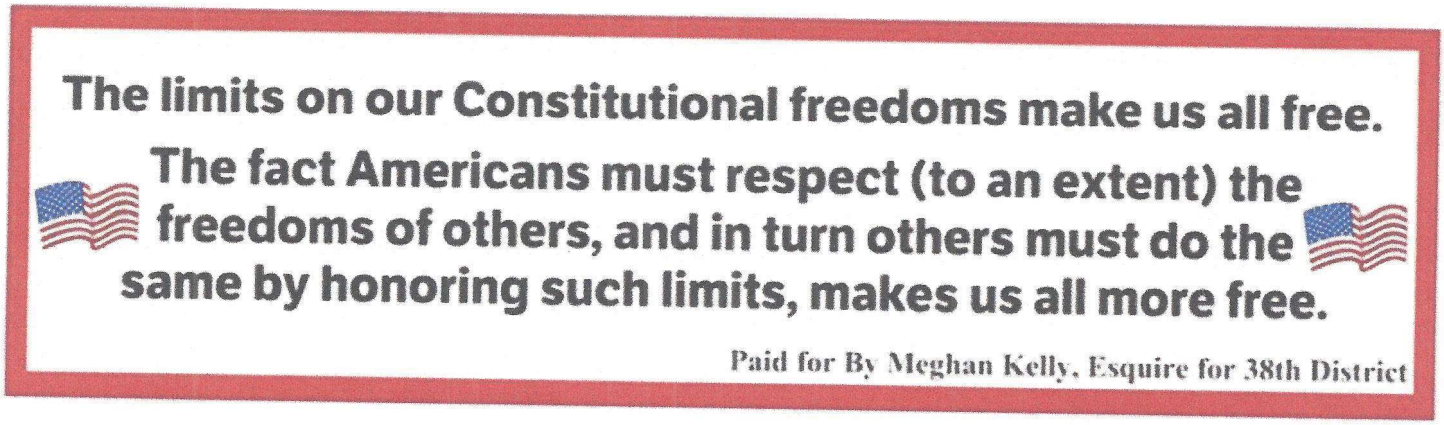
Very truly,

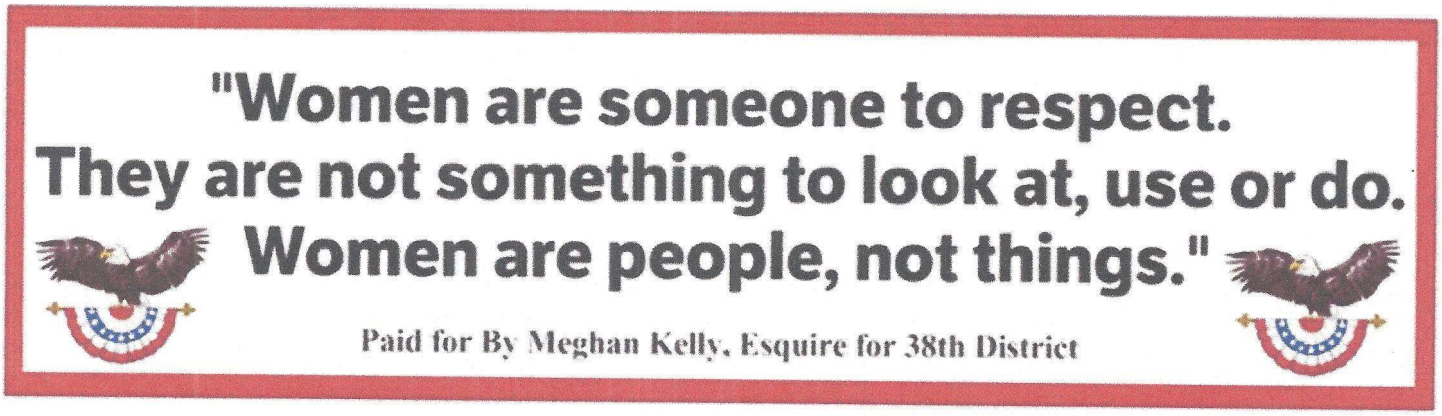
/s/Meg Kelly
Meghan M. Kelly
34012 Shawnee Drive
Dagsboro, DE 19939
(302) 537-1089
DE #4968

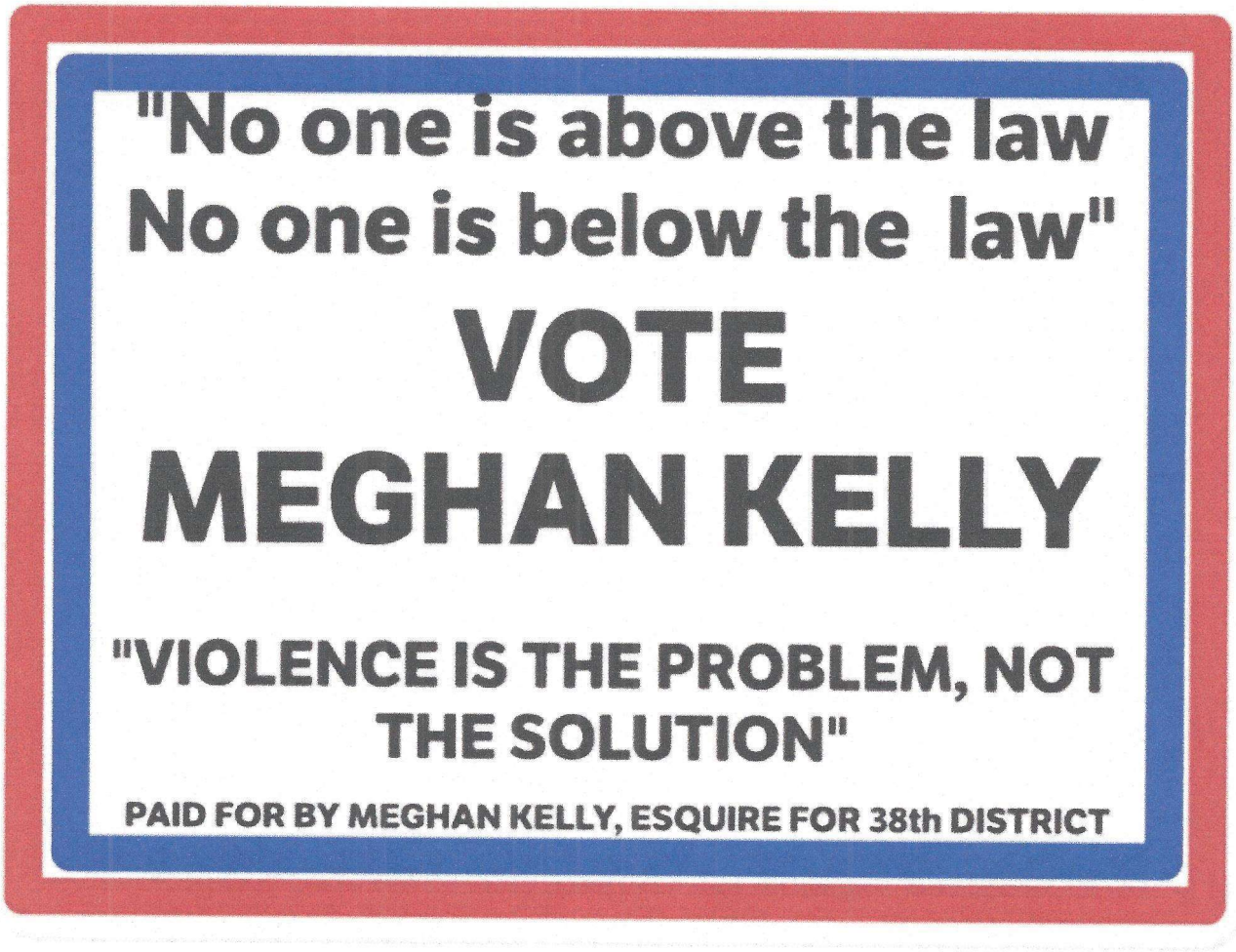
Exhibit H


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).
Paid for By Meghan Kelly, Esquire for 38th District


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, and association, regardless of race, religion, or place of origin.
Paid for By Meghan Kelly, Esquire for 38th District


The limits on our Constitutional freedoms make us all free.
The fact Americans must respect (to an extent) the freedoms of others, and in turn others must do the same by honoring such limits, makes us all more free.
Paid for By Meghan Kelly, Esquire for 38th District


"Women are someone to respect.
They are not something to look at, use or do.
Women are people, not things."
Paid for By Meghan Kelly, Esquire for 38th District


"No one is above the law
No one is below the law"
VOTE
MEGHAN KELLY
"VIOLENCE IS THE PROBLEM, NOT THE SOLUTION"
PAID FOR BY MEGHAN KELLY, ESQUIRE FOR 38th DISTRICT

GREED - THE EVIL SEED THAT BLOOMS INTO HATE.

BUSINESSMEN GIVE BUSINESS TO THOSE WHO REFER BUSINESS TO THEM. THEIR KIDS TAKE OVER THEIR BUSINESS AND SEND BUSINESS TO EACH OTHER. SO, THE TRADITION CONTINUES.

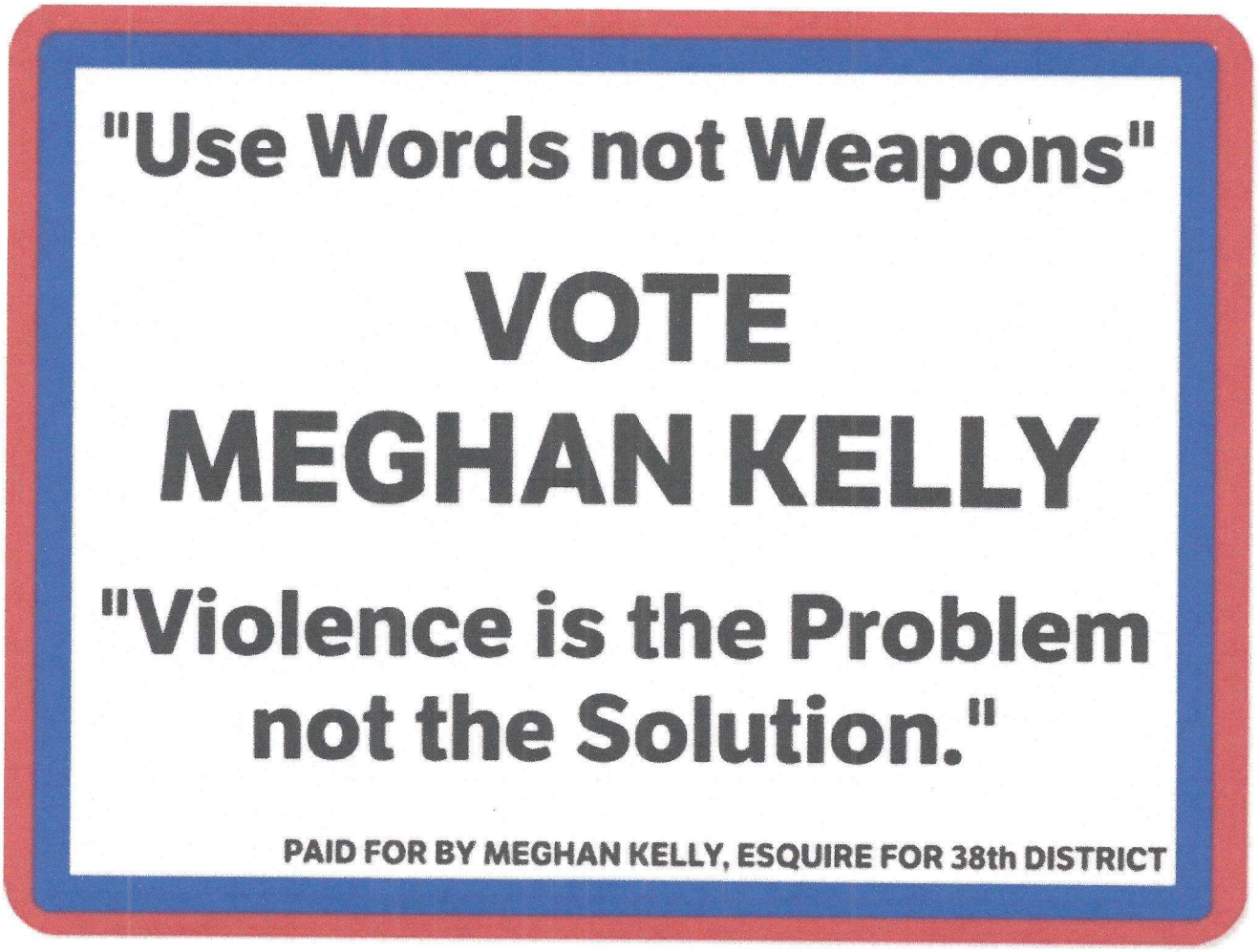
WHEN ALLEGED OUTSIDERS, (FROM DESEGREGATION, THE WOMEN'S RIGHTS MOVEMENT, OUT OF STATERS, AND IMMIGRANTS), STARTED TO COMPETE FOR THE SAME BUSINESS, BUSINESSMEN BEGAN TO FEAR LOSING MONEY.

SO, THEY MISBEHAVED BY NAME CALLING, BIAS, PREJUDICE,BLACK BALLING AND WORSE.

BE COURAGEOUS, RESPECT, NOT COWARDLY BY HATE.

Paid for By Meghan Kelly, Esquire for 38th District

"Women are someone to respect. They are not something to look at, use or do."
VOTE
MEGHAN KELLY
"Women are people, not things."
PAID FOR BY MEGHAN KELLY, ESQUIRE FOR 38th DISTRICT


"Use Words not Weapons"
VOTE
MEGHAN KELLY
"Violence is the Problem not the Solution."
PAID FOR BY MEGHAN KELLY, ESQUIRE FOR 38th DISTRICT

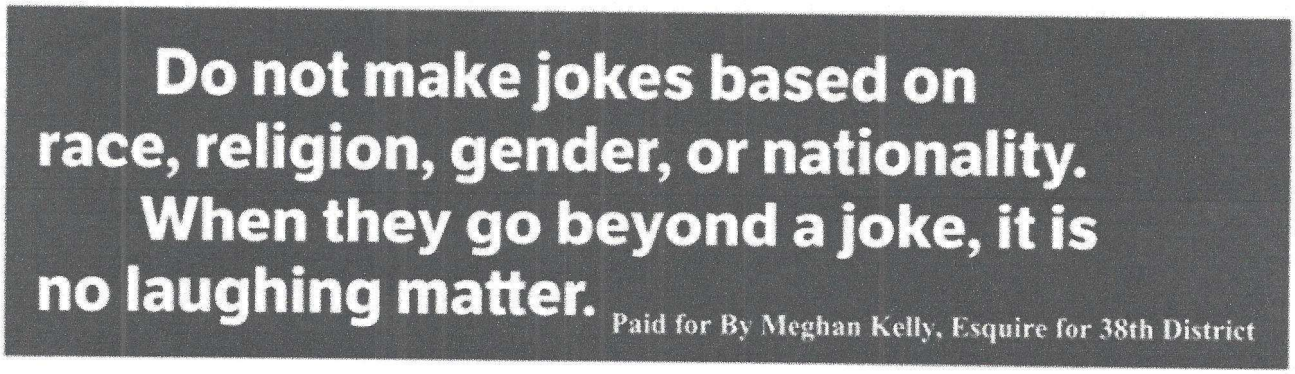

Do not make jokes based on
race, religion, gender, or nationality.
When they go beyond a joke, it is
no laughing matter.
Paid for By Meghan Kelly, Esquire for 38th District

Exhibit I

Coastal Point August 10, 2018

Guest Column

Kelly: Chilling free speech is not cool

By Meghan Kelly, Candidate
Delaware House of Representatives,
38th District

My name is Meghan Kelly. I am an attorney running for the House of Representatives in the 38th District's Tuesday, Nov. 6, 2018, election.

As I candidate for a state position, I have witnessed people in positions of authority misuse their authority to unconstitutionally chill the freedom of political speech. This is no small matter. An attorney can sue people to correct such chilling of 1st Amendment rights, but what will that do? They can take all of their possessions and money. None of that — not all the money in the world — is worth as much as the freedoms we have here in our nation.

Men fought wars for the freedoms we all hold dear. Mere money cannot buy their lives back. Men did not die for money. The American dream is not about finding a job, buying a home, providing for and raising a family. People all over the world aspire for that.

The American dream is much more than merely making money, providing for your family and surviving. What makes the United States of America the dream of so many is Americans' universal respect of other people's freedoms when they step foot on our land.

What makes America great is the people. What makes America great is Americans' universal respect for the freedoms of speech, assembly, religion and association, regardless of race, religion or place of origin.

When people in positions of authority choose not to behave like Americans by respecting the rights of others (emphasis intended), that is when America becomes less great. And yet, I have hope and faith that the people will courageously and kindly confront such behavior with correction, not with more bad behavior.

I am writing about one instance where my freedom of speech was quashed. I attended a celebration for a town. When I arrived beforehand, someone working the event said they knew who I was and talked politics, demeaning my party. I attempted to respond to the discussions, but the mayor and other agents of the Town requested that I didn't.

I told the mayor his request was unconstitutional, but I complied. I was instructed by those with the blanket of authority not to discuss politics at the party. They mentioned the other candidate could not attend.

A couple hours later, I attended the Town's party at the town hall — open to the public, thereby creating a limited public forum. Solicitors of various groups sat with pamphlets, including a church, at the celebration. I did not ask for a table or a place to sit with those handing out materials. I merely desired to respond to political statements and questions.

Yet, I complied with the mayor's request, making it clear that such request was not constitutional.

The mayor's position of authority made his personal requests to refrain from exercising American freedoms more dangerous than a normal citizen.

We all have limits to our freedom of speech, but people in government, and those with authority, have even more limits in exchange for such power, to preserve the freedoms of those they serve. Otherwise, unconstitutional government restraints may inhibit the freedoms of those they serve, by causing fear of persecution.

The constitutional rights and standards differ relating to the type of

See KELLY page A15

Kelly

Continued from page A14

forum where the speech is limited. Is it a private forum, public or limited public forum? Municipalities may use their police power to draft reasonable regulations for the public safety relating to private property. However, private property that is opened up to the public is converted to a limited public forum, where content based speech is not easily limited.

In 1980, the U.S. Supreme Court held that a large shopping store could not limit the freedom of speech, regardless of how disagreeable the speech was to the owner of the grocery store, under the facts of that case. In that case, a private forum was opened up to the public during certain hours, just like many stores are opened to the public. Thus it became a limited public forum where speech is under greater protection than a private forum.

My speech was quashed on public property, opened up to the public for a public event.

The constitutional standards differ not only with regards to the forum, where the freedom of speech may have been infringed upon, but it also differs concerning whether it was restrained by conduct-based restrictions or content-based restrictions.

Conduct-based speech may be limited in a limited public forum by time, place and manner restrictions under a relatively easier standard than the content-based restrictions. Content-neutral restrictions must advance important interests unrelated to the suppression of speech, and must not burden substantially more speech than necessary to further those interests.

In 2010, our Third Circuit ruled it was unconstitutional for a mall to discriminate against noncommercial speech in favor of commercial speech, as this was content-based not content-neutral speech.

Content-based restrictions are presumptively unconstitutional. The government must prove such restriction is necessary to serve a compelling state interest, and is narrowly drawn to achieve that end. Mere open debate concerning political speech does not meet that standard. The freedom to speak freely about politics and other important issues, such as religion, without persecution of the government, is why many people desire to come to America.

There are limits to our freedom of speech, such as false advertising, defamation and obscenity.

The fact Americans must respect (to an extent) the freedoms of others, and in turn others (even mayors), must do the same by honoring such limits makes us all more free.

I keep thinking to myself, men died for this freedom. No amount of money or power is as precious as those men's lives, and the freedoms they bravely fought for. If men are willing to die and kill for this, I should have the courage to confront and correct people in authority so as to honor those men, and to remind the world that they mattered, and to protect what they fought for, not money, but freedom. You can't buy that. It is priceless.

Thank you for honoring our brave by honoring the freedoms they fought for, including the freedom of speech.

Coastal Point July 20, 2018

Guest Column

Representative candidate says health is wealth

By Meghan Kelly, Esq.
Candidate, Delaware House
of Representatives, 38th District

My name is Meghan Kelly, Esq. I am a candidate for the House of Representatives in the Nov. 6 race in the 38th District. I am running, in part, because I have a desire to draft laws to create better health care for Delawareans, and I want to persuade the federal legislators to draft specific legislation to reduce the price of care instead of eliminating care to those who need it most by rendering it unaffordable.

I am uniquely qualified to propose solutions in this area as an attorney who studied the history of medicine at University of Delaware, and health care finance and health care law at Duquesne School of Law School. I even received a small scholarship for healthcare law.

So, I thank you for your kind consideration, as I truly care about serving the people in the community I grew up in, and love and protecting their life and health.

This week, I will write about improving health care concerning the state of Delaware. Next week, I will submit a suggestion to our federal legislators regarding making health care more affordable. Instead of reducing the amount of care, I respectfully urge our federal legislators to reduce the price of care. Only they have the power to do so, I will not.

In Delaware, I specifically want to draft legislation to improve the quality of health care, instead of merely getting massive bad care. Funding is more easily received when health care entities and professionals are researching cutting-edge techniques, which is dangerous for patients since they are still working out the kinks.

Think of the National Institute of the Health (NIH), charities who accept funding from the army and NIH, and private research or health care entities who make money on analysis. So they can use patient's records to sell alleged health care miracles in bulk, based on data. Part of the HIPPA waiver we sign at each doctor's visit allows our information to be used in this scientific research. So, patients may be lawfully used as lab rats.

I want to draft legislation to prevent the abuses we have seen by doctors like Dr. Earl Bradley, who allegedly molested hundreds of children; repeal the involuntary sterilization statute; and make it easier to prevent doctor and health care abuse of patients for a buck...

I want to prevent doctors from prescribing addictive drugs under the facade of benefiting the patient, but in truth to benefit their own pockets, to keep patients coming back for prescriptions for their addiction, not for good health.

I want to stop doctors like the local Delaware doctor who used cutting-edge treatments, hip replacements, on people, including my father. He said everything was fine for years, despite readily available information to the contrary, to cover his own back, instead of serving the patients like my father, the legendary retired teacher, lifeguard and coach Pat Kelly of Indian River High School.

No care is better than bad care. Thus, I desire to create legislation to ensure our health care providers are taking care of the patients, not taking advantage of the patients for profit. Our laws serve money — not people, not patients.

I want to create laws that penalize health care professionals for drugging the elderly at the elderly homes to make them easier to tend, like vegetables. We need to value and respect our elderly, (not keep them in an institution for our convenience). These institutions should

See KELLY page A15

Kelly

Continued from page A14

be developed to serve and respect the elderly, not take advantage of them for a profit.

Now is the time to value human life and health more than money. Now is the time to hold health care professionals accountable for their bad choices to harm instead of heal patients.

I desire to repeal the involuntary Sterilization statute in Delaware under Title 16, Chapter 57 of the Delaware Code. There is too much incentive to sterilize people to use their stem cells for profit and research, instead of alleged need. Besides, the fact is sterilization is barbaric and arguably violates Delawareans' right to life, liberty and pursuit of happiness, despite the United States Supreme Court decision in Buck v Bell, 274 US 200 (1927).

I desire to amend the medical malpractice act. It is very difficult to correct doctors under this act. In Delaware, a patient has two years from the date of the medical provider's misconduct, if a patient is younger than 6, until the patient's sixth birthday. The time may be extended in limited circumstances — for instance, if a doctor left a foreign object in a patient's body.

In addition to the short statute of limitations, in Delaware, you also need to get another health care professional to give an expert opinion concerning the malpractice of the medical provider. This is very tough to get because doctors do not want to give an opinion against a peer when they know they are capable of mistakes or a sloppy job, too.

The requirements of the expert opinion are also hard to meet. So, a lot of lawsuits are kicked out for failure to adhere to the requirements. For instance, if an expert says the doctor's act was a substantial factor in causing the harm, the opinion will get kicked out. In Delaware, the expert must state the "but for" the doctor's conduct the harm would not have occurred.

Overall, if a doctor messes up on you, you most likely will be out of luck. The longer you wait to pursue legal relief, the tougher it will be for the attorney to find an expert required to have a case.

It is important to correct doctors, as the treatment they provide may harm other people for life or kill them. Since it's so difficult to sue, it's hard to prevent further harm by showing how certain treatments make people worse off. That's why we must amend the medical malpractice act in Delaware. We must prevent further patient harm and deaths.

By electing me you will be electing a candidate that will fight for your life and health. You are priceless — more valuable than all the money in the world. By electing me, you will be electing someone who serves people, not greed.

Coastal Point July 27, 2018

Guest Column

Austin was shining light in water-quality fight

By Meghan Kelly, Candidate
Delaware House of Representatives,
38th District

My name is Meghan Kelly, Esquire. I am the Democrat candidate for the House of Representatives in the 38th District's Tuesday, Nov. 6, 2018, election.

My platform includes, but is not limited to, working toward:

- preserving and protecting our environment;
- slowing down the building boom of new homes;
- improving infrastructure to support our communities;
- improving health care; and
- cleaning drinking water.

Last week, I mentioned I would submit a second letter regarding health care. Instead, I am holding off to write about a more important matter this week: A good man has died. It is with great sadness I inform you John Austin passed away on Sunday, July 15, 2018.

On my quest for clean drinking water in Delaware, I met John Austin — a brilliant chemist who worked at the Environmental Protections Agency (EPA) for 33 years, before retiring in the Rehoboth area. I am so grateful he touched my life and the lives of all of Sussex County with his pursuit to care for people in the face of greed. He courageously sought to help clean our drinking water.

John Austin is one of the most brilliant people I've ever met. He talked with me at great length in person, on the phone and via email as I tried to digest his deep understanding of the issues. I am grateful for his love for those beyond his own.

It made me smile to hear him talk about the apple of his eye, his beautiful wife, Marti Austin, who could do kickboxing. He adored her more than any other person on the planet.

The last I spoke with him, he was doing the correct thing, like he always courageously seemed to do during the short time I knew him. He visited a sick relative in another state.

John Austin is a good man. I pray he

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Kelly

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is feeling a fuller type of love with God. I pray God comforts his beautiful wife with his love and gives her faith to continue being a bright light in the darkness, carrying the flame they once carried together, until one day she sees him again and lights up his eyes once more with the mere mention of her name.

I am so sorry for our loss. My prayers, love and gratitude.

John Austin is a light in the darkness, shining bright on evils, to drive the darkness out into the light, to become the light. He brought my attention to potential abuses of industries and waste disposal sites. It is time for all of us to shine a light on this problem, to clean it up, to prevent our neighbors from continuing to die of cancer.

Now is the time to shed light on the water problem. We can look for ways to alleviate it. Legislators, stop hiding in the dark. We see you. We see our drinking water is bad. There is no hiding that.

Thank you, John Austin, for lighting a spark in my heart that has given me hope that we can do something about cleaning our drinking water. You have made a difference in all of our lives. We are forever grateful.

Any improvements relating to cleaning water, protecting our wetlands, preserving our beaches and slowing down home building growth in Delaware should be attributed to John Austin. He gave us the courage to act. Thank you, John Austin. We are honored that you shared part of your life with us. We love you.

Letters

Continued from page A15

in criminal prosecution. While there will always be a need for fraud investigation, I will advocate for fraud prevention and actively participate in training that supports good fiscal operations for the various entities that collect and receive state funds.

My goals are to ensure timely completion of audit mandates; to support the elimination of significant noncompliance, fraud and waste based on clearly defined criteria; to perform follow-up of prior unresolved findings and recommendations; and to provide program evaluation and process recommendations that support government transparency and good government.

On a personal note, I live in Dover with my husband, Jerry, who is retired from 20 years of active-duty service in the Air Force. He currently serves as the union president for the American Federation of Government Employees, Local 1709, at Dover Air Force Base. We have three children and four grandchildren.

In the end, no amount of technology, contracting or delegating that can replace experience, leadership and management specific to the field of state auditing and investigating. As you research the candidates, please consider the need for state auditing qualifications and experience prior to the upcoming elections.

I humbly ask for your vote in the Thursday, Sept. 6, primary.

Kathleen Davies
Candidate for Delaware Auditor of Accounts

Reader offers idea to lessen strife

Editor:

I would like to share with you a "quick fix" to the problem of the political divide engulfing this country, if not the world...

Rewrite the Civil Rights Act of 1964 with the addition of two words: "prohibits discrimination because of race, color, sex, religion, political view or national origin."

Henry R Hensel
Ocean View

Keeley responds to previous letters

Editor:

I am writing in response to a number of letters in the June 29 Coastal Point.

First, Lloyd Elling's seemingly gross misinterpretations of the Second Amendment; the NRA and President Trump's actions are viewed as preposterous positions by many of us that support our rights as citizens.

Second, Valerie Reeves' denounces President Trump's policy on the enforcement of our laws at the border. Even though he's following the same tough policies as President Obama. The very same tough policies that were overlooked by Obama's fawning media. She also mentions "due process," which I believe requires citizenship. Detention of people entering our country illegally, with or without children, is certainly necessary to protect our borders and, in the long run, our country.

Third, Diane Meyer asks for term limits while noting the immigration quagmire currently strangling our Congress. A solution to the immigration quagmire was one of President Trump's main campaign promises, but he has problems with the professional politicians on both sides of the aisle with this issue.

Unfortunately, the quagmire is not limited to immigration. She has a very good point especially when she mentions our own Sen. Tom Carper, who appears to be the definition of a professional politician. Term limits would certainly be a great step toward getting things done in Washington, especially since our representatives in both parties currently seem to spend most of their efforts at getting reelected!

Fourth and last, Henry R. Hensel states that he believes that our political strife will end. I, however, do not see that happening any time soon! We do have the choice between parties where, simply put, one wants smaller government, verses one that believes bigger government is the answer. Our founding fathers feared this type situation, and it seems they were correct!

I do agree with Mr. Hensel's suggestion that we turn off the 24/7 barrage of so-called news thrown at us by the radio, TV and newspapers. But that is easier said than done, and then where would we be?

Thomas M. Keeley III
Ocean View

Candidate discusses title companies' issues

Editor:

My name is Meghan Kelly. I am an

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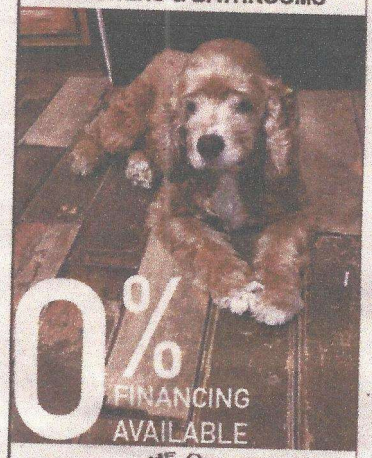
The Lastest from the
Off The Hook Restaurant Group...
TAILCHASERS
EAT
DRINK

Carpets & Renovations by the Ocean
FLOORING & CARPETING
KITCHENS & BATHROOMS


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Letters

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attorney running for the House of Representatives in the 38th District, which includes Frankford, Selbyville, Ocean View, Bethany Beach and parts of Dagsboro.

One of the reasons why I am running is, two years ago, I found a problem that no one cares to fix. I care.

I found a lot of money not getting taxed by the State of Delaware relating to out-of-state real estate title insurance companies. I contacted various people and entities in an attempt to resolve the issue; however, to date, no one has addressed the problem. So, I am stepping up to confront the issue and to correct the problem.

It appears out-of-state title companies have been practicing Delaware law without a license for more than a decade. I talked with other real estate attorneys and discovered this has been a common practice for many years.

The problem arises, real estate attorneys gain work from those same title companies. So, they fear they will lose profit should they confront this misunderstanding.

The out-of-state title companies do not pay income tax in Delaware. So, the State of Delaware is not receiving income tax for this work. In addition, this has caused errors in the chain of title for deeds. So, good title may not be transferred in real estate transactions if errors are not fixed. So, I sought to correct this by discussing this with the real estate section of the Bar.

Justice Holland gave me a call and offered to draft rules, but he retired.

In addition, [state Sen. Gerald] Hocker suggested we fine the title companies for exceeding the scope of their license. I think Mr. Hocker's idea is an excellent one.

I contacted legislators concerning this, but to date this problem has not been alleviated.

Thus, I strongly urge the Delaware Assembly to draft laws to clearly address this problem by giving notice to those out-of-state title companies with a license to sell title insurance the scope of the activities they may receive payment for in the State of Delaware. Should they exceed the scope, unless authorized permitted by law, fine them a specified amount of money.

The clarification will assist title companies in performing their work in accordance with Delaware Supreme Court case law. In addition, this correction will prevent the legislators from stepping on the Delaware Supreme Court's toes by discussing the unauthorized practice of law.

Thank you for your kind consideration. As a future legislator, I hope to participate in this correction, but I am running not only to win — I am running to make a positive difference in the community I grew up in and love.

Thank you for supporting me in serving you.

Meghan Kelly
Dagsboro

Steele weighs in on previous letters

Editor:

This letter is to answer three letters published June 29.

First, to Mr. Ewing: Your comments about President Trump and the crying little girl on the cover of Time magazine is flat-out wrong. That little girl was crying because she was lost for a few minutes from her family and her father found her just after that photo was taken. She was immediately reunited with her mother and father. Let's face it, when will Time magazine or you care to state the facts correctly?

Secondly, what does the Second Amendment have anything to do with illegal immigration? Maybe you are confused and do not know what the Second Amendment is about, basically, the right to bear arms. And that is what the Americans, who live along our southern border, are doing to protect themselves from armed gang members from Mexico plus the drug and human smugglers crossing the border.

You ask the question, "Whose side will you defend?" My answer: Always the Constitution! How about you?

Second, to Mr. Hansel: Thank you!

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Kelly returns to hometown to practice law

By Monica Scott
Staff Reporter

Homegrown lawyer Meghan M. Kelly recently accepted a position in Ocean View, close to her home town of Dagsboro. Kelly will be assisting Steven P. Norman at the Norman Law Firm, formally known as Sussex Title and Escrow, located near Blockbuster and Papa John's.

Kelly is an Indian River High School grad and a graduate of the University of Delaware. Her juris doctorate is from Duquesne School of Law in Pittsburgh, Pa., and she said this week that she is excited to have found a position near her home town.

"I did get a small scholarship from Widener," explained Kelly, who attended Lord Baltimore Elementary and Selbyville Middle schools before IRHS and UD, "but I wanted to get out of the state for a little while before settling down."

After finishing law school and passing the Pennsylvania and Delaware bar exams, Kelly gained expertise working for several firms in the Wilmington area before finding the Norman Law Firm downstate. She has experience representing clients in hearings and mediations, as well as in corporate law, bankruptcy, insurance defense litigation, wills and estates and general litigation. But she has a passion for bankruptcy law so she can help people that really need it, she explained.

She said having a grandfather who was a public defender in Pittsburgh and an uncle who was an attorney, also in Pittsburgh – where several members of her extended family are from – helped her to form the notion of one day studying law.

"They were good role models," she said. "I always thought getting a law degree would empower me to do good and to help people."

She is admitted to the bar in Pennsylvania in the United States District Court of the Eastern District of Pennsylvania, in the District of Columbia in the United States Court of Appeals for the Third Circuit, and in Delaware in the United States District Court for the District of Delaware and the Bankruptcy Court in the State of Delaware. She is a member of the Delaware Bar Association and Phi Alpha Theta.

She is the daughter of Mary and Pat Kelly, who now live in Florida. Pat Kelly was a long-time teacher and basketball coach at Indian River High School before he took a position at Sussex Tech and, finally, made the move to Florida with his wife, who is a pharmacist.

Meghan Kelly's brother and sister, also Indian River High School grads, have both moved westward – to California and Hawaii, respectively – but Meghan says the East Coast is her home. She said it is a dream come true to have found a position in her own community.

"This is my home," she explained. "And I get to serve the people that I love. My family has all moved away, so I consider the community my family. It's a dream to serve the people that I care about in my own community."

Coastal Point • MONICA SCOTT

Meghan M. Kelly has returned to the area to practice law.

Kelly will be available at the Normal Law Firm after July 1. The firm is located at 29 Atlantic Avenue, Suite E, in Ocean View, and also has a Rockville, Md., location. For more information, call (302) 537-3788 or visit www.thenormanlawfirm.com.

DNREC

Continued from page A12

but it is a step in the right direction," Pratt said, "and we do know the vice president fairly well," he added, to laughter from those present.

several other environmental initiatives, such as DNREC's continued negotiations with NRG to shut down Unit 3 at their Indian River Generating Station in Millsboro, which he called "probably one of the greatest pollution sources in the state." He explained that health impacts, "particularly in Millsboro and inland," are being studied and said that he often struggles with the idea

emphasized, saying that clean air and clean water haven't always been enough of a priority.

"It's a little bit of a culture shift that environment and public health be just as important as other public policy," he explained, adding one of his often-expressed views – that economic prosperity and environmental stewardship can happen not in conflict, but

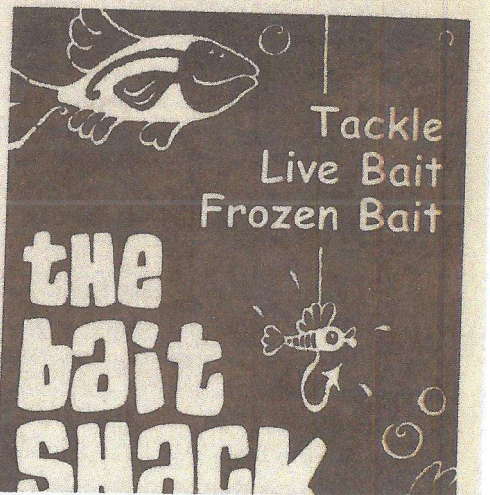

Exhibit J

MEGHAN KELLY, ESQUIRE

34012 Shawnee Drive
Dagsboro, DE 19939

December 10, 2009

The Honorable Peter B. Jones
The Family Court
22 The Circle
Georgetown, DE 19947

Dear Honorable Peter B. Jones,

Thank you for taking time to meet with me 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, Mathew 19: 6; *also see*, NIV., Malachi 2:16 ("I hate divorce"); NIV Genesis 2:20 ("man will … be united to his wife, and they become one flesh"); and, 1 Corinthians 7:10-11, (" A wife must not separate from her husband." "And a husband must not divorce his wife.")

In November, to my horror, I was appointed to a guardianship proceeding. I believe that 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 releived 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

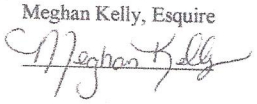

Exhibit K

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 L

IN THE CHANCERY COURT OF THE STATE OF DELAWARE

Meghan Kelly, Plaintiff v. Donald Trump, a.k.a. Donald J. Trump, a.k.a. President Trump a.k.a. President Donald Trump, in his individual capacity, and in his official capacity as President of the United States Defendant.	)	Civil Action No.: 2020-0809

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

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

THE PARTIES

1. Meghan Kelly (also referred herein as, "Meghan," "Plaintiff," "I,") is an adult resident of the state of Delaware, residing at 34012 Shawnee Drive, Dagsboro, DE 19939.

2. Donald Trump, a.k.a. Donald J. Trump, a.k.a. President Trump, a.k.a. President Donald Trump, in his individual capacity and in his capacity as President

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

JURISDICTION

3. This Honorable Court has jurisdiction over Plaintiff's claims pursuant to 10 Del. C. Section 341.

4. This Honorable Court has personal jurisdiction over President Trump pursuant to 10 Del. C. Section 3104 (c)(1). Trump "(t)ransacts ... business or performs ... character of work or service in the State."

5. Trump allegedly transacts businesses by forming entities in this state, by paying the state fees to maintain such entities, and by, or through, transacting businesses or services through such entities, including but not limited to, the business of seeking to form entities and seek the protection of Delaware laws for financial and or limited liability advantages for business gain.

6. According to an article in the Hill, "Donald Trump revealed ... that he has nearly 400 business entities registered in the state of Delaware, a state that has received renewed scrutiny in the wake of the Panama Papers leak as a domestic tax haven."

> "During a campaign rally in Harrington, Delaware, the GOP presidential front-runner said he asked his staff to tell him how many businesses he has registered in the state."

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

7. In the alternative of, or in addition, this Honorable Court has personal jurisdiction pursuant to 10 Del. C. Section 3104 (c)(2), since Trump "Contracts to supply services or things in this State."

8. In the alternative of, or in addition, this Honorable Court has personal jurisdiction pursuant to 10 Del. C. Section 3104 (c)(4), since Trump caused "tortuous injury in the State (to the person of Meghan Kelly) or outside of the State by an act or omission outside the State (because Trump) regularly does or solicits business, engages in any other persistent course of conduct in the State or derives substantial revenue from services, or things used or consumed in the State.

9. Trump alleges he "brings a lot of money" to the state of Delaware through the alleged hundreds of entities he formed in Delaware. Id.

10. In addition, Trump is campaigning in Delaware, performing the business of wooing voters to get elected to the job position of the President of the

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

11. Thus, Trump has significant business ties in Delaware, and acceptance of donations from businesses, or people who reside in Delaware, including but not limited to alleged representatives of Mountaire.

12. Members of the media reported individuals with ties to Mountaire, a chicken plant based in Sussex County, DE, was at one time, President Trump's fifth largest donor in 2016. (Citing, Delmarva Now, The Delaware News Journal, Group accuses Mountaire, a top Trump donor, of poisoning rural Delaware,

By Jessica Bies, June 20, 2019,

https://www.delmarvanow.com/story/news/local/delaware/2019/06/20/group-accuses-mountaire-top-trump-donor-poisoning-rural-delaware/1508519001/)

13. Campaigning, volunteering, fundraising, asking and giving or accepting donations is business, not true charity.

14. Trump seeks donations and volunteers in Delaware.

15. Trump, through his campaign, is campaigning in Delaware.

16. Trump may even pay people to run his campaign, the business of running for elections, by barter or exchange in currency, tempting him to serve

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

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

FACTS

I. BACKGROUND FACTS, SUBSTANTIALLY BURDENING RELIGION BY ETERNAL HARM, LOSS OF ETERNAL LIFE OF LOVED ONES DECEIVED BY THE DEFENDANT

18. Plaintiff, Meghan Kelly, repeats and incorporates by reference all of the above paragraphs and all of the below paragraphs, and the Exhibits and citations, the paragraphs refer to herein as admissible under nonhearsay and hearsay exceptions, including but not necessarily limited to, probative fact, state of mind, belief, present sense impression, periodical exception, excited utterance, admission by party opponent, as though set forth herein in the first instance.

19. This case arises upon President Trump's use of religion for his own vanity, meaning using religion in vain, for his own purpose, religious or otherwise, in violation of not only the Establishment and Free Exercise clauses of the first amendment of the US Constitution applicable to Defendant pursuant to the 5th

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

20. The Defendant committed the alleged conduct mentioned herein while wearing the cloak of government authority and, or bearing the sword that his word, or perceived desire, is a command, and, or, creating the illusion that Defendant supports Christianity, or supports God or God supports Defendant, Defendant's sins, or his policies.

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

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

22. In addition, I believe Trump misleads people I love to hell by creating the illusion his government authority is backed by God, or he supports the God I serve, by conduct discussed herein, thereby causing some people to think my God is not perfect or holy or even real. Since Defendant sins against God and man. Defendant is not perfect. Thus, Defendant is turning potential believers away from salvation from the second death. (See, Leviticus 20:26, God says “be holy because I am holy”); (Also see Matthew 5:48, Jesus commands, “Be perfect as your heavenly father is perfect,” with regards to unconditionally loving people outside of your own, even your enemy.)

23. Americans should worship or not according to the dictates of their conscience without the inherent threat of persecution created by Defendant’s support or suppression of religion.

24. But for Defendant’s conduct there would not be an additional two prong substantial burden and injury to my free exercise of religion causing: 1. Eternal harm, and 2. Chilling of my free exercise of religion by Defendant’s increased threat of government sponsored religious persecution and, or the actual

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

25. Trump causes eternal harm to me.

26. Trump misleads and deceives many to sin, tempting them to reflect the image of Satan by living for self, by doing their own will, without unconditional love.

27. I believe people will be damned to hell but for Defendant's actions and inactions. I believe Defendant will damn people to hell by his misleadership, beyond our lifetimes, by touching humanity with the darkness and ignorance that damns, the sin against the Holy Spirit, unless this Honorable Court stops him through correction, maintaining separation of church and state.

28. An eternal injury suffered by me, is Defendant adversely affects my relationship with God since I believe we, God and I, will not be able to share a fuller type of love with the people the Defendant misleads to hell.

29. Since I love all people, I am harmed by the Defendant's conduct because I believe they will cease to exist. (See Jude 1:12, regarding people as "twice dead"); (See, Revelation 2:11, 20:6, 20:14 and 21:8, regarding the "second death," the final death); (See, Deuteronomy 30:19, 2 Kings 18:32, God says choose

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

30. Thus, I believe I will sadly be prevented from loving them more fully for eternity. Accordingly, Defendant's words, and deeds supporting and suppressing religion by turning people away from salvation via my religion, harms me personally, by substantially burdening my ability to eternally love those Defendant misleads to hell, which is devastating to me.

31. Even if people are "remembered no more," I am still at a loss. I cannot love them, if they are destroyed, perishing in the second death. I believe I will miss out for eternity, even if I may not know it. (Citing, Ezekiel 21:32, ""You will be fuel for the fire, your blood will be shed in your land, you will be remembered no more; for I the LORD have spoken.'"); (Citing, Zechariah 13:2, "On that day, I will banish the names of the idols from the land, and they will be remembered no more," declares the LORD Almighty. "I will remove both the prophets and the spirit of impurity from the land."); (Citing, Job 24:20, "The womb forgets them, the worm feasts on them; the wicked are no longer remembered but are broken like a tree.")

32. God loves them. I believe God created every person because he loves them and for eternal life. (See, Wisdom 2:23-24 further provides "For God formed

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

33. I am also injured because I recognize God’s loss, and my heart aches for my Lord, especially since thousands are dying of Covid19, potentially under the deceit of the Defendant, to be doomed to hell.

34. With Defendant’s acceptance of the cloak of government authority, his rights became more limited under the first amendment, so as not to chill the freedoms of those he serves by publicly supporting one religion over others, even injuring me indirectly by injuring those I love, while suppressing, persecuting and or ignoring the freedom of other religious beliefs or non-beliefs. (See, The Hill, Trump: Jews who vote Democrat show 'lack of knowledge or great disloyalty', by Brett Samuels, 08/20/19 03:38 PM, https://thehill.com/homenews/administration/458135-trump-jews-that-vote-democrat-show-lack-of-knowledge-or-great, Trump said “Jews who vote Democrat show ‘lack of knowledge or great disloyalty, thereby suppressing Jewish people’s faith by persecution I words.); (Also see, Trump calls for discrimination against

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

35. This case is a case of first impression, with little judicial case law to be our guiding light. Therefore, I respectfully ask this Honorable Court to be our light.

36. The lineage of holiday display cases and possibly school teaching cases may be the closest applicable cases this Honorable Court may consider as it guides the nation on upholding the Constitutional freedoms of the people from government persecution, and specifically the freedom to worship or not, according to the dictates of each person's conscience, not the dictates of the President, or government agents, under the inherent threat of harm or persecution, should a person disagree with the government supported religious belief.

37. The United States Constitution protects the rights of the people to worship or not according to the dictates of their conscience, not the dictates of the government.

38. Trump is the President of the United States.

39. Trump accepted the cloak of government power and became bound to the reduced freedoms the Constitution grants to him in the form of limits upon his free exercise of religion, as President of the United States, when he was sworn in as President, in order not to diminish the Constitutional freedoms of those he serves, the people residing in America, regardless of gender, race, religions, age and place of origin.

40. Trump abused and misused his authority as President and violated his oath of office, by creating the appearance of government backing one religion over other religions.

41. In exchange for the cloak of government power, government servants, employees and agents, including President Trump, have reduced freedoms in order not to chill the Constitutional freedoms of those he, and other government agents, serve.

42. In exchange for the cloak of government power, government servants, employees and agents, including President Trump, are bound by oath to uphold the Constitution, including the Constitutional freedoms of those with different beliefs and views.

43. The Constitution is not a license for government agents, such as Trump to persecute people, either socially, economically or violently, nor is it a license for government agents to encourage others to persecute people based on religious beliefs or perceived religious beliefs which differ from government actors, or agents such as Defendant, President Trump.

II. ADDITIONAL LEGAL FACTS ON PLAINTIFF'S RELIGION AND FACTS ON DEFENDANT REFLECTING THE IMAGE OF SATAN BY PLACING SELF FIRST, AND TEACHING OTHERS TO DO THE SAME BY HIS EXAMPLE, MISLEADING THEM TO HELL UNDER THE GUISE OF GODLINESS

44. My personal religious beliefs are in issue. So, I am providing additional facts concerning my religion, and my beliefs.

45. I am a Christian.

46. I believe in God, the Father.

47. I believe in God the son, Jesus Christ.

48. I believe in God the Holy Spirit.

49. I believe that God loves me and all of humanity so much that he reveals himself in three different ways, the Father, the son, Jesus, and the Holy

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

50. I believe we all are empowered to choose to accept or reject God, to accept God in our hearts, or harden our hearts to God's love and salvation from the final death through God's teaching us the way of love leading to eternal life.

51. I find guidance in Jesus, the Word made flesh.

52. I find guidance in the Holy Spirit.

53. I find guidance in God, the father.

54. I find guidance in the Bible.

55. Pursuant to the Bible, Jesus says, "The greatest among you is your servant." (Citing, Matthew 23:11). Accordingly, living to serve self is not great.

56. In fact, I believe the root of corruption in both business and government is serving those who serve you, thereby serving yourself, instead of the people you are supposed to serve. (Also see, Matthew 20:26 and Mark 10:43, Jesus says, '"whoever wants to become great among you must be your servant"'); (Also see, Luke 22:26, Jesus teaches, '"But you shall not be like them. … (T)he one who leads like the one who serves.")

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

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

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

59. I believe people sin against God when they merely serve their own children and families, and those who serve or affect them, instead of all the people they are appointed to serve in their position of life.

60. Jesus said even evil people care for their children. (See, Matthew 7:9-12, “Which of you, if your son asks for bread, will give him a stone? Or if he asks for a fish, will give him a snake? If you, then, though you are evil, know how to give good gifts to your children...")

61. I believe Defendant places himself first, reflecting the image of the evil one.

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

63. Defendant appointed his daughter, Ivanka Trump, and son in law, Jared Kushner, for government positions with the White House, creating the appearance of serving family first which I believe misleads people to hell by believing Trump's evil example is good or Godly. (See, The Hill, Ivanka Trump will have an official White House position, By Olivia Beavers, 03/29/17 04:57 PM EDT, https://thehill.com/homenews/administration/326400-ivanka-trump-will-have-an-official-white-house-position, relating to appointing Ivanka to a government position, and noting the appointment of Jared Kushner, the Defendant's son in law.).

64. I believe we are commanded to love others as ourselves, not love our own families more than others, by exploiting our position at the expense of those we are charged in order to serve, to instead serve our own family in positions of global influence where there is the possibility of trading of favors, at Americans' expense.

65. I believe Defendant sins against God and man by his partiality towards his own family or those who serve his interests, at the expense of those he is charged to serve, thereby misleading others to hell by teaching them to love others less than they love their own.

66. Jesus said even those without God love those who love them; and greet those who greet them. (See, Luke 6:32-35, "if you love those who love you, what credit is that to you? Even sinners love those who love them. And if you do good to those who are good to you, what credit is that to you? Even sinners do that. But love your enemies, do good to them, and lend to them, expecting nothing in return. Then your reward will be great, and you will be sons of the Most High; for He is kind to the ungrateful and wicked"); (See also, Romans 12:14); (See Matthew 5:44-45, "But I tell you, love your enemies and pray for those who persecute you, that you may be sons of your Father in heaven."); (Matthew 5:46-47, "If you love those who love you, what reward will you get?... And if you greet only your people, what are you doing more than others? Do not even the pagans do that?")

67. I believe God calls us to love God foremost and to love others, even those outside of our own, even our enemies, as ourselves. (See, Matthew 22:36-40, The greatest command in the bible is to love God. Subordinately, love others as yourself. All commands are weighted on these.)

68. I believe leaders who serve themselves and those who serve them are not good leaders. They are misleaders and deceivers, not public servants. They mislead and deceive those they purport to serve, to instead exploit them, to serve themselves, by placing self first. I believe Servants of Self are Servants of Satan.

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

69. I believe Defendant serves himself foremost, and those who serve him at the expense of those he is charged to serve.

70. I believe Christians are commanded to place God first by loving God and living for God foremost, and subordinately, Christians are commanded to love others as ourselves, not less than ourselves, not loving ourselves more than others.

71. I believe we live or die for God. Citing, Romans 14:8.

72. I believe those who live and die for self or for mere people instead of God do not go to heaven.

73. I believe Jesus was not kidding when he said “you who love mother and father more than me are not worthy of me.” “You who love son and daughter more than me are not worthy of me are not worthy of me.” (Citing, Matthew 10:37).

74. I believe Jesus was not kidding when he said unless your “righteousness exceeds that of the scribes you will” not go to heaven. (Matthew 5:20.)

75. I believe our righteousness exceeds that of the scribes by our trust in God through his Word, accessible through the Father, son and Holy Spirit.

76. I believe the Bible teaches Abraham believed what God said. His belief was attributed to righteousness. (Citing, Genesis 15:6.)

77. Abraham listened to God to the point he was willing to sacrifice his own son. (Citing, Hebrews 11:17).

78. I believe this righteousness was attributed to Lot when he listened to God's word through messengers, the angels. He did not even turn around when his wife turned into a pile of salt. (See, Genesis 19:26).

79. In the Parable of the ten virgins in Matthew 25: 1-13 Jesus tells a story of ten virgins traveling to a marriage feast. All ten virgins had lamp oil. Five ran out, and asked those who had oil to give them some. Those with oil responded rightly by telling those without, no, go buy your own or we will not have enough ourselves. They did not even say sorry. Those who bought the lamp oil did not get back in time and were locked out of the marriage feast, meaning they went to hell.

80. I believe Jesus teaches us by this parable that: yes, we love others, and yes, we love ourselves, but we love God more, and live for God foremost, not for self or others. Id.

81. Trump's campaign includes the Slogan "America First."

77. Trump says "as the President of the United states I will always put America First." (Citing, The Hill Trump: I will always put America first, By Max Greenwood, - 09/19/17 10:33, https://thehill.com/homenews/administration/351320-trump-i-will-always-put-america-first).

82. I believe Trump's America first policy, teaches people to learn to place themselves first, like the devil in Isaiah Chapter 14, thereby teaching them to be children of the devil, instead of children of God, damning them to hell for evil thinking or evil doing.

83. I believe Trump teaches folks not to place God first, under the guise of Godliness, by failing to teach those he serves to care about others, regardless of race, religion or place of origin, as they care for themselves.

84. I believe President Trump's focus on putting self first, by teaching Americans to put America first, misleads and deceives people to reflect the image of Satan, by learning to love money and merriment, profit and pleasure more than other people.

85. Instead of loving one another, people wrongly learn to love money to the extent that they are willing to harm and destroy human life, and eternal life to serve their fleeting fancies for funding and temporary desires.

86. I believe President Trump's winning at all costs, even at the cost of cheating, violating greater laws, of justice, mercy and faithfulness (See Matthew, 23:23), makes us all lose, modeling the reflection of the image of Satan called the "lawless one" by his disregard of laws that teach us to care about other people. (Citing, 2 Thessalonians 2:8, also see Psalm 101:3); (I define evil as absence of love because "God is love." Citing, 1 John 4:16, People without God in their hearts have an emptiness they attempt to fill with fleeting fancies, fleeting feelings, fleeting funding or other idols in place of God's love.); (See Exhibit 8, including articles of impeachment I proposed to impeach Trump for violating certain laws. These are evidence of my belief in Defendant's lawlessness.)

87. I believe President Trump teaches the image of Satan, the "lawless one," as good, by teaching everyone for themselves, lawlessness, under the facade of greatness or business, but in truth greed, without love or concern for outsiders or those beyond their own, misleading those he serves to harm and hell. (Citing, 2 Thessalonians 2:8-9).

88. It makes me sad because I believe Defendant President Trump violates the First Amendment and God's laws by using God's name for his own vanity, meaning his own purpose in place of God's purpose, to serve power and profit under the guise of God thereby misleading people to harm and hell.

89. Sadly, I believe people go to hell for their confusion. Satan, the lower case" god of this world," confuses to kill eternally. (Citing, 2 Corinthians 4:4); (Also see 2 Corinthians, Chapter 4 to confirm by reading the entire chapter.)

90. I believe the prophets in the Old testament, John the Baptist, Jesus and the apostles all bravely and courageously confronted leaders who did evil, by serving themselves instead of those they were charged with serving.

91. In Ezekiel Chapter 34:1-10, God scolds leaders, called shepherds, who take advantage of the sheep, meaning the people they are charged to care for, to serve themselves instead of caring for them. "Woe to you shepherd of Israel who only take care of yourselves! Should not shepherds take care of the flock? You eat the curds, clothe yourself with wool and slaughter the choice animals, but you do not take care of the flock...." Id. (Also see, Jeremiah 23:1, and Zechariah 11:17); (Also see, Jeremiah 50:6, "My people have been lost sheep; their shepherds have led them astray and caused them to roam on the mountains. They wandered over mountain and hill and forgot their own resting place."); (Isaiah 53:6, "All we like

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

92. I believe President Trump sins against God and man by harming others to serve self.

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

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

94. I believe President Trump chooses not to use his free will, which is his brain, his mind, to choose to think, to care, to love others as himself.

95. I believe President Trump loves others outside of his own less than he loves himself. (See, On Russian bounties, what did Trump know and when did he know it?, MSNBC, By Steve Benen, June 30, 2020, 8:00 AM EDT https://www.msnbc.com/rachel-maddow-show/russian-bounties-what-did-trump-know-when-did-he-know-n1232506, Defendant President appeared to be willing to sell the souls of troops to serve himself, or the in the alternative, it appeared the Defendant did not care enough about the American troops with bounties on their heads to speak up on their behalf.)

96. The Holy Spirit, via God, via my conscience, teaching me to care, to love, is leading me to do the same as the prophets, to correct the President, in hopes to heal not only the victims of the harm he causes in this life and to prevent eternal harm in the next, but to heal his ugly heart with God's truth in love, not deception. God loves other people too, even your enemy, people of other political

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

III. FACTS, THE HOLY SPIRIT, DISCERNING A GLIMPSE OF GOD AND MAN'S HEARTS, JUDGING CORRECTLY THROUGH THE HOLY SPIRIT, AND ADDITIONAL LEGAL FACTS ON CAUSATION AND FAITH

97. My religious beliefs are genuine.

98. The Holy Spirit led me to file complaints against Justice Kavanaugh to uphold the integrity of the courts from the appearance of impropriety. (See, Exhibit 1, letters confirming Meghan Kelly filed ODC complaints); (Amos 5:15, "Hate evil, love good; maintain justice in the courts. Perhaps the LORD God Almighty will have mercy on the remnant of Joseph."); (Amos 5:12, "There are those who oppress the innocent and take bribes and deprive the poor of justice in the courts."); (Zechariah 8:16, "Speak the truth to each other, and render true and sound judgment in your courts").

99. After all, I believe, "justice, mercy and faithfulness" are more important commands than laws relating to mere money per Jesus Christ. (Citing, Matthew 23:23).

100. I believe justice is done by correcting leaders like Defendant who mislead some of those they serve to harm and hell. (See, Matthew 23:15, Jesus scolded leaders telling them they were making their converts “twice as much a child of hell as (they) are.”)

101. The Holy spirit led me to file a lawsuit against the Democrats in the state of Delaware in order not to compromise my belief in Jesus’s teachings to run for office. (See, Exhibit 2, Court stamped Complaint relating to Chancery Court Case Number 2020-0517).

102. My faith in the Holy Spirit is genuine. I confronted the Delaware Supreme Court when they violated my religious rights to affirm instead of swear into the Delaware Bar. (See Exhibit 3).

103. I twice rejected appointments to family law matters as violating my religious beliefs (See Exhibit 4).

104. I confronted the Courts in Delaware per the attached letter concerning impartiality and bias. (See Exhibit 5); (Also see, Leviticus 19:15 "You must not pervert justice; you must not show partiality to the poor or favoritism to the rich; you are to judge your neighbor fairly"); (see, Exodus 23:6, "You shall not deny justice to the poor in their lawsuits."); (see, Deuteronomy 16:19, "Do not deny justice or show partiality"); (also see, Deuteronomy 1:17, "Show no partiality in

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

105. I even shared my view on what using the name of God in vain means when I proposed a suggestion to Senator Tom Carper of Delaware. (See, Exhibit 6). I believe it means using the name of God, or religion or scripture for man's purpose instead of a true religious purpose.

106. The Holy Spirit is revealed to me because I am born again per Jesus Christ's teachings in John Chapter 3. Per John 3:3-8, Jesus said;

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

107. I believe Jesus.

108. I do not know all things, but through the Holy Spirit I gain some understanding of truth, and of God's will and design.

109. Through the Father, Son and the Holy Spirit, God is accessible to me, and to all of humanity should they not harden their hearts. (See, Matthew 28:1,

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

110. Through the Holy Spirit we are able to know God.

111. I know God.

112. I have accepted the Holy Spirit into my heart.

113. The Word of God, also known as the Holy Spirit, is also revealed to us through other people, born again, including the people mentioned in the Bible, and the writers of the Bible who accepted God, the Spirit of Truth, in their hearts by laying down their will to understand and to do God's will by their love.

114. I believe we are able to know God better through the Holy Spirit revealed through the writers and people in the Bible by reading or listening to the Bible.

115. I believe they accepted the Holy Spirit in their hearts, like I did. For example, (See, Daniel 13:45 "God stirred up the Holy Spirit of a young boy named Daniel."); (See, Genesis 41:38 ‘So Pharaoh asked them, "Can we find anyone like this man, one in whom is the spirit of God?"’); (See, Exodus 31:3 and Exodus 35:31, “and I have filled him with the Spirit of God, with wisdom, with

understanding, with knowledge and with all kinds of skills"); (See, Numbers 11:17, "I will come down and speak with you there, and I will take some of the power of the Spirit that is on you and put it on them."); (See, Numbers, 11:25, "Then the LORD came down in the cloud and spoke with him, and he took some of the power of the Spirit that was on him and put it on the seventy elders. When the Spirit rested on them, they prophesied--but did not do so again.); (See, Deuteronomy 34:9, The Holy Spirit is also called the "spirit of Wisdom,"); (See, Judges 3:10, The Holy Spirit is also called the "spirit of the Lord" The holy spirit works the same in the Old testament too.); (Also see, Romans 8:14, "those who are led by the Spirit of God are children of God."); (Also see, Psalm 51:12, "Restore to me the joy of Your salvation And sustain me with a willing spirit."); (See, Wisdom 1:4-6, "Because into a soul that plots evil wisdom does not enter, nor does she dwell in a body under debt of sin. For the holy spirit of discipline flees deceit and withdraws from senseless counsels and is rebuked when unrighteousness occurs. For wisdom is a kindly spirit, yet she does not acquit blasphemous lips; Because God is the witness of the inmost self and the sure observer of the heart and the listener to the tongue"); (See the entire book of wisdom too. The Wisdom described in this book is another name for the Holy Spirit); (See, Matthew 1:18, "This is how the birth of Jesus the Messiah came about: His mother Mary was pledged to be married to Joseph, but before they came

together, she was found to be pregnant through the Holy Spirit.”); (See, James 1:5 “If any of you lacks wisdom, you should ask God, who gives generously to all without finding fault, and it will be given to you.” Wisdom meaning the Holy Spirit, the Word that guides our steps with a light on the narrow way.); (Also see, Luke 11:13 "If you then, being evil, know how to give good gifts to your children, how much more will your heavenly Father give the Holy Spirit to those who ask Him?" If we ask God to be the Lord of our life, if we ask God into our hearts and lay down our will, our desires, for God’s will, which is eternal life through love, truth, justice, mercy and faithfulness, he will not reject us.); (See, Matthew 12:32 "And whoever speaks a Word against the Son of Man will be forgiven; but whoever speaks against the holy Spirit will not be forgiven, either in this age or in the age to come."); (See, Mark 13:11, “Whenever you are arrested and brought to trial, do not worry beforehand about what to say. Just say whatever is given you at the time, for it is not you speaking, but the Holy Spirit.”); (Mark 12:36, “David himself, speaking by the Holy Spirit, declared: "'The LORD said to my LORD: "Sit at my right hand until I put your enemies under your feet."'); (See also, Mark 3:29, “but whoever blasphemes against the Holy Spirit will never be forgiven; they are guilty of an eternal sin.” This means hardening your heart to loving God and others as yourself, even those who inconvenience others you. I believe this means not accepting God in your heart and not reflecting love, God’s image.); (Matthew

3:11, John the Baptist said, “I baptize you with[a] water for repentance. But after me comes one who is more powerful than I, whose sandals I am not worthy to carry. He will baptize you with[b] the Holy Spirit and fire.”); (John 14:26, “But the Advocate, the Holy Spirit, whom the Father will send in my name, will teach you all things and will remind you of everything I have said to you.”); (John 16:13, “But when he, the Spirit of truth, comes, he will guide you into all the truth. He will not speak on his own; he will speak only what he hears, and he will tell you what is yet to come.”); (John 14:17, “the Spirit of truth. The world cannot accept him, because it neither sees him nor knows him. But you know him, for he lives with you and will be in you.”); (Ephesians 1:13, “And you also were included in Christ when you heard the message of truth, the gospel of your salvation. When you believed, you were marked in him with a seal, the promised Holy Spirit.” This seal can be broken should we sin against the Holy Spirit without repentance and reconciliation with God by love. It is possible to choose to turn away from God like King Solomon who wrote two books in the Bible did. I hope he repented, but do not know.); (See, 2 Peter 2:21 “It would have been better for them not to have known the way of righteousness, than to have known it and then to turn their backs on the sacred command that was passed on to them.” We most definitely can lose the way to salvation. Just because God knows everything at once does not eliminate our freedom of choice.); (See, Hebrews 3:14, “We have come to share in

Christ, if indeed we hold our original conviction firmly to the very end."); (See, also, Matthew 24:13, "but the one who stands firm to the end will be saved."); (1 John 4:6, "We are from God, and whoever knows God listens to us; but whoever is not from God does not listen to us. This is how we recognize the Spirit of truth and the spirit of falsehood."); (And see, John Chapter 3, Regarding being born again, being born of flesh in human life and of spirit receiving eternal life the same as Moses and Daniel did in the Old Testament.).

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

Romans, 9:6-8 “It is not as though God’s word had failed. For not all who are descended from Israel are Israel. Nor because they are his descendants are they all Abraham’s children. On the contrary, ‘It is through Isaac that your offspring will be reckoned.’ In other words, it is not the children by physical descent who are God’s children, but it is the children of the promise who are regarded as Abraham’s offspring.” It is not by bloodline but I believe by faith, the same faith as those examples in Hebrews Chapter 11, the same faith Abraham manifested.); (See also, Romans 4:3, and Galatians 3:6, Abraham believed God was not kidding and that was attributed to him as righteousness.); (Also see, Romans 2:15 With regards to those without God or religion or other religions, their conscience will defend them or condemn them on judgment day.); (Also see, Galatians 3:28 "There is neither Jew nor Gentile, neither slave nor free, nor is there male and female, for you are all one in Christ Jesus.); (See,1 John 4:8. The laws taught us we are loved and to love for "God is love." We have the free will to choose to reflect the image of God by our love or the image of the devil by our absence of love, replaced by our lusts, our own will, including but not limited to our own desires, living for self, putting self or family first, or people pleasing or living for something else in place of God, in place of love, such as not desiring to rock the boat, to avoid conflict.); (See also, 1 John 4:16 "God is love"); (See, Matthew 10:34-37, Jesus Citing, Micah 7:6, with regards to rocking the boat. ‘“Do not suppose that I have

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

117. Jesus proclaims: "By this everyone will know you are my disciples, if you love one another." (John 13:35.)

118. That love is how we choose to reflect God’s image instead of the image of the evil one. (See, Genesis 1:26-27, regarding creating man in the image of God.).

119. I believe sin means absence of love in our thinking or doing.

120. I believe even if we confuse serving the lusts or sinful desires of others as love, sin is still evil, and may damn people to hell without a cleaning of our hearts through repentance.

121. Jesus gave us the new Command to help us to better understand the narrow way, to elaborate on his command "love your neighbor as yourself." (Citing, Matthew 22:39); (See, Leviticus 19:16-18, Jesus cites an old command, but clarifies by teaching a neighbor is all of humanity, not merely fellow Israelites); (See, Luke 10:29- 37, I believe Jesus explains a neighbor in this parable was someone outside of their own by their love, in response to the question of who is my neighbor, meaning all people by our love.)

122. Jesus said I give you a new command. "Love one another," meaning every person, even your enemies, even your business competitors, even out of staters, like folks from Pennsylvania. (Citing, John 13:34).

123. It takes the choice to use your free will, which is your brain, your mind, to think, to seek truth, to care, to know God, to love God foremost and to love one another subordinately. (See, Matthew 22:37-40 regarding the greatest commandment, love God and the second greatest commandment love your neighbor as yourself, not less than yourself.)

124. We clearly learn we have a choice in Sirach 15:11-17 which provides:

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

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

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

126. We love God, in part, by seeking to understand God's heart. Admittedly we know only partially. (See, 1 Corinthians 13:12, "For now we see only a reflection as in a mirror; then we shall see face to face. Now I know in part; then I shall know fully even as I am fully known.")

127. Jesus teaches we know man's heart by his words. (See, Matthew 12:34-37, Jesus stated, "'You brood of vipers, how can you who are evil say anything good? For the mouth speaks what the heart is full of. A good man brings good things up in him, and an evil man brings evil things out of the evil stored up in him. I tell you everyone will give an account for every careless word they have spoken. For by your words you will be acquitted, and by your words you will be condemned.'"); (See also, Matthew 15:18, "But the things that come out of a

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

128. Accordingly, we know God, by God's Words accessible through the father, son and the holy spirt, including the Bible and the Word made Flesh, Jesus Christ.

129. I believe the Holy spirit through the Word of God, the Bible, teaches we gain a glimpse of God's heart by his Word, through the Holy Spirit within those who wrote or are written about in the Bible.

130. That is why King David was called a man after God's own heart because he sought to gain a glimpse of God's will, God's heart's desires, by studying his Word, revealed through his laws in the Bible. (See, Acts 13:22, "'I have found David son of Jesse, a man after my own heart; he will do everything I want him to do.'"); (See, including but not limited to, Psalm 119:20, Psalm 119:30, Psalm 119:91, Psalm 10:5, Psalm 119:43, Psalm 119:175 David talks about seeking to know and live God's laws in the Book of Psalms.).

131. 1 Corinthians 2:15 provides, "He who is spiritual (a person with the Holy Spirit) judges all things, but such a person is judged by no one."

132. Additionally, in John 7:24, Jesus says, '"Stop judging by mere appearances, but instead judge correctly."' I think this means through the lens of the Holy spirit, by how God teaches us to think, to examine people's hearts.

133. I believe Jesus is disappointed in people for merely judging physical things correctly, but not judging spiritual things. (See, Matthew 16:3 where God scolds religious leaders for misunderstanding.)

134. The Holy Spirit helps us to see things how they actually are.

135. I believe the bible teaches many people are evil, not good, choosing to reflect the image of Satan instead of God because they are misled by men like Defendant President Trump.

136. Children are born evil like we all are, and children are most in danger of hell should they die without the opportunity to be born again per Jesus in John chapter 3. (See, Ezekiel 9:4-6, I believe these verses teach children will be damned to the second death on judgment day too. Besides Jesus says no one can go to heaven unless they are born again in John Chapter 3. Since children are afforded fewer opportunities to be born again, they are most likely to be damned to the final death which makes me sad.)

137. Matthew 18:6, Jesus says, '"It would be better for them to be thrown into the sea with a millstone tied around their neck than to cause one of these little ones to stumble," meaning misleading children off of the narrow path to heaven onto the broad path to hell. (Also see, Luke 17:2, and Mark 9:42. For companion citations); (Matthew 7:13-14, "Enter through the narrow gate. For wide is the gate and broad is the way that leads to destruction (meaning hell, the final death), and many enter through it. But small is the gate and narrow the way that leads to (eternal) life, and only a few find it." The way is narrow, uncompromising full of integrity, not false assurance and false comfort.)

138. It is a great sin to mislead and deceive people to serve sins to be damned to hell.

139. I am concerned about everyone's eternal lives, especially the little children as they watch Defendant Trump misbehave, or their elder's support of Defendant and so indirectly support his misbehavior under the guise of good or God. I believe, but for Defendant, little children, as well as adults, are misled to hell too.

140. I believe more people will go to hell because they are deceived by the Defendant, unless the veil of deception is somehow lifted by this Honorable Court. (See Matthew 27:51, I think the veil being torn at the death of Jesus symbolizing

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

141. I believe Defendant Trump will mislead people to hell, beyond his or my lifetime, unless this Honorable Court corrects Defendant Trump.

142. I believe future federal government agents, such as the President, will mislead people to hell because of Defendant Trump's bad example, beyond my life time, if they are permitted to use religion for their own vanity, regardless of which religion, thereby inherently suppressing certain religions, and supporting others to support their personal purposes under the guise of religion, while acting under the cloak of government authority.

143. The President's public support for God is causing de facto government sponsored private religious persecution.

144. I believe Christians should obey the greatest command to love God by living for God and subordinately to love one another. Love does not encourage harm in this life and eternal life for mere material convenience. (See, Romans 13:10).

145. I believe our purpose is bigger than anyone in this world or anything in this world. We were meant to live forever, to feel a fuller type of love with God and one another. Yet, we all, individually, choose eternal life or the final death. (See, Deuteronomy 30:19, "I have set before you life and death, blessings and curses."); (Also see, Jeremiah 21:8, I am setting before you the way of life and the way of death."); (Deuteronomy 30:15, See, I set before you today life and prosperity, death and destruction.); (Psalm 56:13, For you have delivered me from death and my feet from stumbling, that I may walk before God in the light of life. God's Word saves us from hell); (Psalm 107:20, He sent out his word and healed them; he rescued them from the grave. God's Word via the Holy Spirit, and the Word made Flesh, Jesus Christ); (Psalm 119:105, "Your word is a lamp for my feet, a light on my path." We have a choice to seek the Word while it may be found, and the way to eternal life or to ignore or reject it, to our own doom.)

146. Sadly, I believe scripture teaches many will perish in the second death. Few find eternal life since they are misled by leaders like Defendant who lead them into temptation.

147. We are saved by the love of God and his love is showing us the way of salvation via loving God and the new command loving one another. (See, John 13:34 '"A new command I give you: Love one another. As I have loved you, so you must love one another.'").

148. I believe showing us the way to escape death is pretty loving of God.

149. I believe many people confuse people pleasing as love. Many confuse lusts as love, and they perish for their misunderstanding.

150. I believe the Defendant is encouraging confusion and veiling the truth that can save people from their sins through deception. (See, 2 Corinthians 3:14-18, "But their minds were made dull, for to this day the same veil remains when the old covenant is read. It has not been removed, because only in Christ is it taken away. Even to this day when Moses is read, a veil covers their hearts. But whenever anyone turns to the Lord, the veil is taken away. Now the Lord is the Spirit, and where the Spirit of the Lord is, there is freedom. And we all, who with unveiled faces contemplate the Lord's glory, are being transformed into his image with ever-increasing glory, which comes from the Lord, who is the Spirit.")

151. Hundreds of people are dying of Covid19 every day. It is better to tell people sins will kill you. It is better for people to turn away from sins, which is absence of love, and be saved from the second death, than to encourage folks to dismiss the sins that hurt others and themselves eternally, despite gaining gold, and glory here, thereby encouraging folks to remain in sin, as Defendant models by dismissing sins by ignoring his own wrong doing and the wrong doing of those who serve Defendant's interests.

152. I love people and do not want them to perish in hell.

153. Nevertheless, I believe many will perish in hell on judgment day, despite loudly claiming God, should their feet not be guided back on the narrow way by the Holy spirit revealed by others who accepted it and hopefully to them, before it is too late. (see, Matthew 7:13-14, Most of humanity does not have eternal life.); (See, Luke 13:23-28, Many people claiming to be Christian will be damned to hell, despite trying to go to heaven.); (Isaiah 10:22 22, "Though your people be like the sand by the sea, Israel, only a remnant will return. Destruction has been decreed, overwhelming and righteous." Most of Israel's descendants will be destroyed. It is not by bloodline per Romans Chapter 9 that people are Israel, it is righteousness attributed to faith.); (See, Isaiah 10:21, Romans 11:5, Romans 9:27, 2 Kings 19:31, Isaiah 37:32, Micah 7:18, Jeremiah 23:3, Zechariah 8:6, Throughout the bible only a mere remnant will be saved, which breaks my heart, driving me to fearlessly act in hopes to save them.); (Matthew 7:22- 23, "Many will say to Me on that day, 'Lord, Lord, did we not prophesy in Your name, and in Your name drive out demons and perform many miracles?' Then I will tell them plainly, 'I never knew you; depart from Me, you workers of lawlessness!" Many try and do not go to heaven.)

154. I believe people do make a difference. Hence, I believe we serve God by exposing sins and by correcting wrongdoers in Court in hopes to save folks'

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

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

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

156. I believe God, the Holy Spirit revealed to us through other people and through the Bible too.

III. CHILDREN OF THE DEVIL v. CHILDREN OF GOD, THE MARK OF THE BEAST, THE WHORE, THE DAMNED V THE MARK OF LOVE, OF GOD

157. I am a child of God. (1 John 4:7, “Dear friends, let us love one another, for love comes from God. Everyone who loves has been born of God and knows God.”); (1 John 3:9, No one who is born of God will continue to sin, because God's seed remains in them; they cannot go on sinning, because they have been born of God.”); (Galatians 4:7, “So you are no longer a slave, but God's child; and since you are his child, God has made you also an heir.”); (Wisdom 2:13-15, “He claims to have knowledge of God, and calls himself a child of the Lord. We see him as a reproof to our way of thinking, the very sight of him weighs our spirits down; for his kind of life is not like other people's, and his ways are quite different.”)

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

159. 1 John 3:10-11 Provides:

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

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

161. Scripture teaches me there are more of the desolate one, meaning those without God, than with God. (See, Isaiah 54:1, ‘"Sing, barren woman, you who never bore a child; burst into song, shout for joy, you who were never in labor; because more are the children of the desolate woman than of her who has a husband," says the LORD.”); (Galatians 4:27, “or it is written: ‘Be glad, barren woman, you who never bore a child; shout for joy and cry aloud, you who were never in labor; because more are the children of the desolate woman than of her who has a husband.’”)

162. I believe scripture teaches children of God will live with “children of the evil one.” (Citing, Matthew Chapter 13.)

163. I am taught by God to judge, or discern children of the devil from children of God. (1 John 2:9, “If anyone claims to be in the light but hates his brother, he is still in the darkness.”); (See, 1 John 2:11, “But whoever hates his brother is in the darkness and walks in the darkness. He does not know where he is going, because the darkness has blinded his eyes.”); (1 John 3:15, “Everyone who hates his brother is a murderer, and you know that eternal life does not reside in a murderer.”)

164. Jesus commands us to “judge correctly,” I believe commanding us to know the “pigs” and “swine,” meaning folks who profess Jesus but trample upon

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

165. "Pigs" and "swine" behave the same as Satan did in Genesis, Chapter 3, and in Matthew, 4:1-11 and in the companion verse Luke 4:1-13, by tempting humanity to reflect the image of the devil under the guise of God, as he harms and destroys those who are misled. Id.

166. I believe Trump's fruits, words and deeds, bear "thorns and thistles" per scripture, encouraging others to do the same under the guise of good or God, creating more fuel "for the fires" of hell. (Citing, Matthew 7:16, "By their fruit you will recognize them. Do people pick grapes from thornbushes, or figs from thistles?"); (See, Ezekiel 21:32, Ezekiel 15:4, Isaiah 9:19, Isaiah 9:5, Habakkuk 2:13, Ezekiel 15:6, Jeremiah 51:58, relating to the fuel for the fires of hell to be burnt up on judgment day.)

167. I believe leaders have the power to mislead people to hell.

168. But for some leaders' words and deeds, I believe many would not go to hell.

169. But for Defendant President Trump's words and deeds, I believe many would not be misled on the way to hell.

170. I believe putting words in God's mouth or distorting the meaning, or accepting, or creating the illusion of a wrong meaning to serve a purpose other than God's will, is using God's name in vain. (See, Ezekiel 13:3, "This is what the Sovereign LORD says: 'What sorrow awaits the false prophets who are following their own imaginations and have seen nothing at all!'"); (Lamentations 2:14, "The visions of your prophets were empty and deceptive; they did not expose your guilt to ward off your captivity. The oracles they saw for you were empty and misleading."); (Jeremiah 23:16, "This is what the LORD of Hosts says: 'Do not listen to the words of the prophets who prophesy to you. They are filling you with false hopes. They speak visions from their own minds, not from the mouth of the LORD.'"); (Jeremiah 28:15, "Then the prophet Jeremiah said to the prophet Hananiah, '"Listen, Hananiah! The LORD did not send you, but you have persuaded this people to trust in a lie."')

171. I believe it is wrong because I learned it from God's teachings about false prophets and the wolves in sheep's or shepherds' clothing that mislead the sheep to slaughter by using God's name, or the name of good, in vain. (See, Matthew 7:15-23, 1 John 4:1, Mark 13:22, Matthew 24:24, Matthew 24:11, Luke 6:26, Ezekiel 34:2).

172. To confirm, I believe people have the power to mislead other people to hell.

173. I believe Defendant is misleading people I love to hell, under the guise of heaven, and those Defendant misleads are misleading others to hell too.

174. I believe Jesus noted the power of people to mislead others to hell when Jesus scolds religious leaders for making their followers twice as worthy of hell, under the guise of Godliness. (See, Matthew 23:15, "Woe to you, teachers of the law and Pharisees, you hypocrites! You travel over land and sea to win a single convert, and when you have succeeded, you make them twice as much a child of hell as you are.").

175. Children of God, know God.

176. I know God more by seeking to understand his Word, through the father son and holy spirit, and the holy spirit revealed to us through the Bible too.

177. Children of the devil have the power to mislead others to hell.

178. I believe Trump is a child of the devil.

179. I believe people are made in the image of God by their ability to love unconditionally since we are taught God is love.

180. 1 John 4:16 provides in part "God is love."

181. I believe God is love.

182. I believe we become saved by being born of God by accepting God, the Holy Spirit, in our hearts, which is love in our hearts to help us realize our strength and power to fearlessly choose to reflect the image of God by loving God foremost and loving others as ourselves.

183. The Devil, and children of the devil, like I believe Donald Trump is, mislead the masses to hell under the guise of heaven, or self gain, by driving out God in their hearts, unconditional love in the hearts of man, replaced with lust and business greed, by barter or exchange.

184. Love is unconditional, not giving to get.

185. Business is conditional, giving to get, not unconditional love.

186. I believe toiling in the soil, business, is one of the punishments for original sin meant to teach humility, not to be glorified teaching the sin of Satan pride thereby misleading many to hell. (See Genesis 3:17-19).

187. Since I love God, and seek to love God by loving others, God and I are at a loss as Defendant misleads folks to the second death.

188. Any of Defendant's alleged religious purposes do not remove his violations of the laws in this case.

189. I believe Defendant reflects a little piece of hell on earth by his absence of love, which is the absence of God.

190. I believe Defendant models misbehavior that encourages folks to become children of the devil, instead of children of God, under the guise of God.

191. I believe the Defendant reflects the image of the devil.

192. I believe but for Defendant's illusion of Godliness, many people would not be misled to the way of hell, should they remain in confusion without repentance.

193. I believe the Defendant reflects the mark of the beast by what he thinks about as if written on his forehead, and by how he lives as if written on his hand. (See, Revelation 13:16-17, "And the second beast required all people small and great, rich and poor, free and slave, to receive a mark on their hand or on their forehead, so that no one could buy or sell unless he had the mark, the name of the beast, or the number of its name." I believe money and material gain is on their forehead by what they think about, and on their hand by how they live, not love for one another, not love for God.); (See, Revelation 14:9-11, '"If anyone worships the beast and its image and receives its mark on their forehead or on their hand, they, too, will drink the wine of God's fury, which has been poured full strength into the cup of his wrath. They will be tormented with burning sulfur in the

presence of the holy angels and of the Lamb. And the smoke of their torment will rise for ever and ever. There will be no rest day or night for those who worship the beast and its image, or for anyone who receives the mark of its name."'); (See, Revelation 16:2, Revelation 13:16 and Revelation 19:20, and); (See, Revelation 20:4 Not everyone chooses the mark of the beast. The number of the beast is 666, representing the amount of gold in Solomon's temple); (See, 1 Kings 10:14 and 2 Chronicles 9:13, "The weight of the gold that Solomon received yearly was 666 talents." This relates to the number of the beast 666, meaning greed, gluttony and self-gain.); (See, Revelation 13:18, "This calls for wisdom. Let the person who has insight calculate the number of the beast, for it is the number of a man. That number is 666." I believe the man is the devil. The devil is called a man in Isaiah Chapter 14.); (See Isaiah 14:16, "Those who see you stare at you, they ponder your fate: '"Is this the man who shook the earth and made kingdoms tremble,'"); (See, 1 John 5:19, "We know that we are children of God, and that the whole world is under the control of the evil one."); (1 John 4:4, "You, dear children, are from God and have overcome them, because the one who is in you is greater than the one who is in the world.").

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

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

195. I believe the prophets also call people prostitutes in Scripture for exchanging their trust in God for something else like money or material things, thereby they work for material gain not spiritual riches, giving their lives, selling their lives, their works, for mere money, instead of God. (See, Matthew 6:19-21, Jesus instructed, ‘"Do not store up for yourselves treasures on earth, where moths and vermin destroy, and where thieves break in and steal. But store up for yourselves treasures in heaven, where moths and vermin do not destroy, and where thieves do not break in and steal. For where your treasure is, there your heart will be also.”’).

196. I base my belief, in part, because the Holy Spirit through a prophet scolds his people for trying to be loved by the world by material gain only to hurt themselves: Ezekiel 16:32-34 provides;

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

197. I believe the mark of the beast is business greed, by barter or exchange, conditionally caring without unconditional love, living for mere rewards and benefits without sacrificial unearned love towards others.

198. Business is not the sin.

199. Business greed is the sin.

200. When people like Defendant love money more than people he uses to get money or material gain, I believe he chooses to reflect a little piece of hell on earth.

201. I believe people can participate in business and love the people they may gain funding from more than the money they receive or potentially may receive.

202. I believe Jesus when he says "You cannot serve God and money." (Citing, Matthew 6:24.)

203. I believe "the love of money is the root of all evil: which while some coveted after, they have erred from the faith, and pierced themselves through with many sorrows." (Citing, 1 Timothy 6:10, King James version.)

204. Defendant glorifies money, business greed, winning for self at the cost of harming or even bankrupting others.

205. I believe Defendant glorifies business, and teachings many to mind their own business without concern for others.

206. I believe people go to hell for merely minding their own business since their minds are not on loving others unconditionally by concern, thought and deed.

207. I believe children of God are known by their love.

208. I believe children of the devil are known by their absence of love. (See, John 13:35, "By this everyone will know that you are my disciple, if you love one another.)

209. Children of God are marked on their forehead and on their hand, by the love of God in their hearts which reflects what they think about, as if written on their forehead, and on their hand by how they live. (See Ezekiel 9: 4, “and said to him, “Go throughout the city of Jerusalem and put a mark on the foreheads of those who grieve and lament over all the detestable things that are done in it.” Those who grieve because of the sins of others were marked of God and not to be destroyed in hell on judgment day); (See, Exodus 13:9, Exodus 13:16, Deuteronomy 6:8, Deuteronomy 11:18, relating to God’s love and guidance which teaches us we are loved and to love, and is to be remembered as if written on our foreheads and on our hand, by how we live.)

210. I believe Trump glorifies the punishments for the original sin, and the fruits of the punishment such as sex and money, loyalty, or martyrdom, teaching pride that damns people to hell instead of receiving edification via humility leading to salvation relating to "toiling in the soil," work, child bearing, marriage and death. (See Genesis Chapter 3 regarding original sin and the punishments for original sin.)

211. I believe Trump is encouraging others to misbehave by glorifying the punishments and the fruits of the punishment of original sin as Godly or good, thereby misleading them to hell.

IV. DEFENDANT EXACERBATES STRAINS AND TENSIONS INSTEAD OF ALLEVIATING THEM ENCOURAGING FOLKS TO GIVE INTO TEMPTATION TO SIN TO THEIR DESTRUCTION IN HELL FOR ABSENCE OF LOVE REPLACED BY FEAR UNDER THE GUISE OF GODLINESS

212. Trump exacerbates tensions relating to sex, place of origin, disease and death, religion, race, and economic strains instead of alleviating them, thereby increasing temptations for people to sin by giving into fear, which drives out love, misleading people to hell under the illusion of Godliness.

213. Per 1 John 4:18, “Love drives out fear”. (Id. “There is no fear in love. But perfect love drives out fear, because fear has to do with punishment. The one who fears is not made perfect in love.”)

214. Accordingly, I believe fear drives out love.

215. Defendant Trump increases fear and anxieties instead of loving those he is charged to care for by alleviating legitimate concerns.

216. The Bible teaches the cowardly do not go to heaven. (See, Revelation 21:8, “But the cowardly, the unbelieving, the vile, the murderers, the sexually immoral, …, the idolaters and all liars--they will be consigned to the fiery lake of burning sulfur. This is the second death.")

217. Fear is sin. The bible teaches us not to be afraid, with the caveat to fear the Lord as he will damn you for harming yourself or others God loves. (See, Deuteronomy 31:6, 1 Chronicles 22:13 and 2 Chronicles 32:7, “Be strong and courageous. Do not be afraid ...”); (See, Luke 12:4-5, “I tell you, My friends, do not be afraid of those who kill the body and after that can do no more. 5But I will show you whom you should fear: Fear the One who, after you have been killed, has authority to throw you into hell. Yes, I tell you, fear Him!”); (See, Psalm 27:1); (See, 1 Samuel 12:14, and Joshua 24:1 “Fear the Lord”).

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

219. I believe Defendant also misleads people to hell by teaching them to exploit others, especially the needy, to serve themselves, their own families or own people’s material gain which is great sin.

A. MISTREATMENT OF WOMEN

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

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

221. Trump's lustful words and deeds mislead people I love to dismiss this sin when Jesus Christ says it is better to tear out your eye balls than to be thrown into hell for wrongfully lusting after women. (Citing Jesus Christ in Matthew 5:27-30).

222. Trump sins against God by demeaning women as things to look at, use, or do instead of people to honor and respect.

223. I believe sex is marriage before God whereby a man becomes a servant of his wife until he dies. A man who does not live to serve her, cheapens

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

224. Jesus teaches leaders are servants. (See, Matthew 23:11 and Luke 22:26.)

225. In Ephesians 5:23, I learn husbands are leaders to their wives.

226. Thereby I believe husbands, as leaders, are servants to their wives. Husbands feed, care for and tend to their wives. Misleaders, teach husbands to enslave wives, instead of teaching husbands to be servants. Misleaders like Defendant teach men to be servants of self.

227. I believe Servants of self are servants of Satan, and servants of sin.

228. Servants of self exploit those they profess to serve, misleading and deceiving them, under the guise of helping them, to instead help themselves instead.

229. I believe Defendant exploits women, demeaning them, to instill pride in self and in other men which thinking I believe damns people to hell.

B. MISTREATMENT OF FOREIGNERS

230. I believe Trump persecutes the foreigner by his policies at the Border, when the Bible teaches us to love foreigners as ourselves. (See Exhibit 7, please refer to the article of impeachment I drafted related to the border).

231. The Bible in Leviticus 19:34 provides, "The foreigner residing among you must be treated as your native-born. Love them as yourself, for you were foreigners in Egypt. I am the LORD your God."

232. The Bible in Exodus 22:21 commands, "You must not exploit or oppress a foreigner resident, for you yourselves were foreigners in Egypt."

233. The Bible in Deuteronomy 10:19 commands, "So you also must love the foreigner, since you yourselves were foreigners in the land of Egypt.".

234. Defendant encourages the people to violate these commands by instilling unconcern, absence of love and bitterness for those who may compete for jobs and resources, instead of loving them, not exploiting them or resenting them for the love of money.

235. "'They can't get jobs, because there are no jobs, because China has our jobs and Mexico has our jobs,' Trump said." (Citing, ABC News, *Donald Trump Sells Chinese Goods Despite Accusing China of Stealing US Jo*bs, *Trump says he's "obligated" to buy Chinese goods while China has U.S. jobs.*, By SUSANNA KIM, June 17, 2015, 2:45 PM, https://abcnews.go.com/Business/donald-trump-sells-chinese-goods-accusing-china-stealing/story?id=31826791).

C. ADDITIONAL ECONOMIC STRAIN

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

237. I believe good leaders alleviate economic strains, instead of ignoring or exploiting them, by at least giving those the leaders serves notice to prepare for foreseeable harm so as to reduce the harmful impact.

238. I believe Trump is increasing temptations to sin by driving out love replaced by fear, leading many people to hell by exacerbating desperate conditions instead of alleviating them, fanning the flames of disease and death, racial tensions, political tensions, economic tensions, religious tensions, and gender based tensions, under the illusion of Godliness.

239. Defendant increases desperate conditions by his failure to care for those he serves, exacerbating harm, and thereby, increasing the temptation for the people he is charged to serve, to sin, by focusing on money, misleading them to hell.

240. I believe defendant exacerbates desperate conditions to exploit the masses he is charged to serve tempting them to serve greed, trust in money, to be damned to hell.

241. Defendant teaches people to serve greed instead of teaching them to care for one another which leads people to hell. (See, Acts 8:20, “Peter answered: ‘May your money perish with you, because you thought you could buy the gift of God with money!”). (People are more valuable than money. God commands us to

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

242. Defendant increases the probability of welfare, social security, Medicare and retirement will be reduced by his policy of ignorance and exploitation by discouraging love for one another, and encouraging business greed, thereby tempting people to love money, seek to trust in and protect money, while driving out their love for others, misleading many people to hell.

243. I believe there is always a way out from sin. (See, 1 Corinthians 10:13, "No temptation has overtaken you except what is common to mankind. And God is faithful; he will not let you be tempted beyond what you can bear. But when you are tempted, he will also provide a way out so that you can endure it.")

244. Should social security be eliminated or reduced, Defendant may choose to persuade Congress to lift the cap on the social security tax, which would increase funding so all earned wages would be taxed. Or in the alternative, Defendant may encourage congress to apply social security taxes upon higher waged earners to encourage businesses to not only pay their employees more to avoid paying more in taxes, but also to increase tax revenue to help fund social security to take care of the elderly.

245. Additionally, Congress has the power to coin money without borrowing it during the duration of the pandemic. Congress has the power to bail out all Americans $2,000.00 a month, with back pay from the inception of the national emergency to alleviate the economic strain to take care of the people instead of exploiting them to serve business greed. It is okay if Americans boost other economies by buying international goods. I believe other people are not our enemies. They merely are people who live somewhere else, people Jesus commands us to love not exploit to serve greed.

246. Instead of alleviating desperate economic strains by implementing policies and encouraging laws that care for the people, the Defendant exacerbates economic strains to serve those who may serve him, thereby serving himself, at the expense of those he is charged to serve.

247. Defendant encourages polluting factory jobs, which I believe will become low paying, back breaking and polluting bad investments, causing not only money losses, but also loss of life, health and permanent destruction to the environment affecting the lives and health of future generations.

248. Under the guise of helping people Defendant merely seeks to exploit them under his policy of job encouragement, to serve himself through bartered favors, at the expense of those he is charged to serve.

249. I believe the United States does not have the laws to protect the environment and people required should more factories be built.

250. I believe the initial salaries for potential factory workers may be higher now, before foreseeably, losing a hundred fold of profits down the line as the global businesses open up and compete and create improvements off the backs of bad investments made to fail here at home, reducing salaries here while leaving the scars of loss of health, life and pollution, while reducing factory workers' salaries, or eliminating jobs by automation or due to loss of profit.

251. Additionally, the suppliers of raw materials such as North Korea and Russia, may tempt businessmen and businesswomen into forming factories by offering low costs for materials, as they may collude in get rich quick business schemes with American businessmen and women to make money off of failing in America too. Once the factories are built and investment and debt is incurred, the suppliers may increase the prices down the line reducing profit and thereby encouraging the temptation for the factory owners to reduce the salaries of their workers.

252. Defendant allegedly seeks to bring manufacturing or factory jobs to the United States.

253. I believe there is no foundation of success for factory jobs, just stress, distress and failure at this time.

254. I believe Defendant tempts people to sell or enslave people's souls in exchange for salaries, to serve business greed, by his jobs rhetoric, only to harm them down the line, by creating jobs where people will be exploited for profit, taken advantage of under the guise of being taken care of. (See, CNN, Trump wants to create 10 million jobs in 10 months. Here's why that might be tricky, By Anneken Tappe, CNN Business, Updated 12:24 PM ET, Fri August 28, 2020https://www.cnn.com/2020/08/28/economy/trump-10-million-jobs/index.html).

255. Those in charge of manufacturing companies or factories may escape personal culpability for the physical and economic harm they may foreseeably cause, including unpaid construction fees, while gaining profit, via resigning, entering the business into bankruptcies, not personal bankruptcies, and by receiving business bail outs, tax breaks or other government incentives.

256. I believe it is wrong when business people make money off of failure, while escaping personal culpability. Yet, I believe this is the foreseeable result of Defendants' economic model.

257. I believe bad business, made to fail business is made more profitable for some big businesses at this time, under the Defendant's administration.

258. The Defendant appears to have made profit despite failed bankrupted businesses, which is evidence that bad business, also known as, made to fail business is often profitable in America, by those who exploit our unjust laws.

259. The Internal revenue allows for businesses, including farmers, if requirements are met, to take deduction for losses against profits for about three years back or three years forward if they spill, kill or destroy food or products under 26 U.S. Code § 1212.

260. During this pandemic, sales for some products around the globe has foreseeably decreased as governments have partially, temporarily closed down certain sectors of the economy around the globe.

261. Thus, many big businesses likely will receive less revenue from products sold, albeit they may have artificially increased stocks by stock buy backs, creating the appearance of an economic boom or stability, while possibly maintaining high salaries or even giving bonuses to those in charge for such manipulated increase in stocks.

262. Many businesses will be foreseeably tempted to enter into Bankruptcy, insulating many salaries and bonuses given to people by businesses and entities, who work in made to fail, made to bankrupt, businesses or entities.

263. Since, profit loss for big businesses is increasingly likely during the pandemic as factories or entities partially shut down, businesses have a decreased incentive to give products or food or products away since the businesses cannot deduct charitable donations against such losses, during a year they made little to no profit under the tax code, unless the Cares act amended this.

264. Thus, many businesses, had an incentive to destroy or throw out products to take advantage of the rule deducting losses against future or past profit, instead of giving to charities.

265. In addition, businesses are more likely eligible for business bailouts or business loans if they declare losses by killing, spilling or destroying food or products by throwing them out.

266. Many Americans may remain hungry as farmers spilled milk literally, with the incentive to gain the tax write off and or eligibility for bailouts or loans.

267. By trashing products and items to gain monetary advantage, business men and ladies increase pollution in wasteful production, for throw away items while also filling up the landfills.

268. The three year forward and back business tax break is a tool to monopolize supply to maximize business profit at the cost of harming people's lives, health and the environment.

269. I believe the Defendant is increasing the risk of an artificial, intentional, manufactured stock market crash that will foreseeably occur down the line by choosing not to discourage made to fail businesses, where even state and local government employee's pensions may be at risk of reduction or loss in Chapter 9 bankruptcies, thereby tempting folks to focus on money instead of God, by exacerbations of desperate conditions, misleading many to hell.

270. I believe the tax break for charitable donations serves Satan and damns people to hell. I believe this tax rule drives out unconditional love from the hearts of men replaced with business greed by barter or exchange. (Citing Matthew 6:1-5, and 26 U.S. Code § 1212).

271. I believe Defendant's is misleading people to give to charities years down the line to take advantage of this unholy rule, the charitable tax deduction rule, thereby misleading them to hell for the praise of men or some other benefit. (26 U.S. Code § 1212).

272. I believe Defendant encourages violations of the 13th amendment, forced servitude by increasing the conditions to foreseeably reduce and, or remove

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

273. I believe pro bono, fundraising, volunteering, organized charity, and even selling girl scout cookies is a great sin that damns people to hell, and those they mislead too, should they not repent of such evil.

274. In Matthew 6, Jesus commands do not give charitable love seen. I believe it is better not to give anything than to give charity recognized. Jesus teaches when you give charitable alms, do not know your left hand from your right hand, meaning do not give out of one hand to get out of the other. By teaching giving to get is charitable love, people wrongly learn business by barter or exchange is love, driving out the love from the hearts of man, replaced with the love of money, the mark of the beast, the mark of the damned as good, business greed. (Citing Matthew 6:1-4); (See, Romans 4:4 "Now to the one who works, wages are not credited as a gift but as an obligation." Love is not business and can not be bought or bartered for.)

275. Like "hypocrites" many who encourage charitable donations, teach giving money is good. (Citing Matthew 6:2). So, if someone has no money to give, they wrongly learn they can not be good. Next thing you know, people are

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

276. Compromising Jesus's words for man's material gain only harms and misleads the people for temporary benefits.

277. It is not worth selling souls for a bowl of soup, or food, or to encourage charitable alms which violate Jesus's teachings, no matter how starving someone is, since it misleads people to eternal death in hell. (See, Genesis 25:29-34, This is the story of Jacob and Esau where Esau sold his birthright for a bowl of soup)

278. I believe we do not live by bread alone but feed our soul with every word of God for eternal life. (Citing, Deuteronomy 8:3, Matthew 4:4, Luke 4:4).

279. I believe those who live on bread alone, meaning money and material things or people they may seek to buy by loyalty or favors, do not have eternal life.

280. Defendant also donated his salary. (USA TODAY, Fact check: President Donald Trump donates his salary, but he still makes money, by Molly Stellino, published July 11, 2020, https://www.usatoday.com/story/news/factcheck/2020/07/11/fact-check-donald-trump-donates-salary-but-he-still-makes-money/5410134002/).

281. I believe the Defendant sins against God and man for donating his salary because it violates Jesus Christ's teachings not do charitable alms recognized.

282. I believe the Defendant misleads people to hell by donating his salary, under the guise of good or Godliness.

283. Defendant models misbehavior, some Americans follow under the guise of good, thereby misleading them to hell by sinful thinking. (Isaiah 9:16 "For the leaders of the people have misled them. They have led them down the path of destruction," meaning hell, the final death); (Matthew 15:14, "Disregard them! They are blind guides. If a blind man leads a blind man, both will fall into a pit." meaning hell); (Matthew 23:16 "Woe to you, blind guides! You say 'If anyone swears by the temple, it means nothing; but if anyone swears by the gold of the temple, he is bound by his oath."); (Micah 3:5 "This is what the Lord says: 'As for the prophets who lead my people astray, who proclaim peace while they chew with their teeth, but declare war against one who puts nothing in their mouths.")

284. As a Christian, I love all people.

285. I believe some people are misled to hell under the guise of heaven by Defendant's leadership.

286. The Defendant has not chosen to scold Americans use of violence toward human life and health, or to discourage the use of violence against people as opposed to property, and so he encourages violence by inciting passion, so the people sin, leading to hell, instead of encouraging truth in love and guidance. ('No Blame?' ABC News finds 54 cases invoking 'Trump' in connection with violence, threats, alleged assaults. President Donald Trump insists he deserves no blame for divisions in America. By, Mike Levine, May 30, 2020, 8:20 AM, https://abcnews.go.com/Politics/blame-abc-news-finds-17-cases-invoking-trump/story?id=58912889&fbclid=IwAR0lxUvVytdnrT2EahtVznEzSudldtMU9SBee_gORxyOLua025FmPoqe_Wo); Washinton Post, The Trump administration said that militarizing the police reduces crime. Is that true?, by Ayse Eldes and Kenneth Lowande, June 1, 2020 at 5:00 a.m. EDT, https://www.washingtonpost.com/politics/2020/02/26/trump-administration-says-that-militarizing-police-reduces-crime-is-that-true/); (See, CBS News, "When the looting starts, the shooting starts": Trump tweet flagged by Twitter for "glorifying violence", MAY 29, 2020 / 1:16 PM / CBS/AP https://www.cbsnews.com/news/trump-minneapolis-protesters-thugs-flagged-twitter/ The president encouraged violence by tweeting when the looting starts the shooting starts).

286. The Defendant failed to admonish neo Nazis, white nationalists or kkk members against the use of violence after people were harmed or killed by their alleged members.

287. I believe my God teaches the use of violence is wrong.

288. I believe might does not make right. Might makes wrong. (See, Wisdom 2: 10-11 regarding how children of the devil think. “Let us oppress they needy just man; let us neither spare the widow, nor revere the old man for his hair has grown white with time. But let our strength by our norm of justice; for weakness proves itself useless.”)

289. Defendant’s policies encourage the destruction of the environment to serve greed through his executive orders encouraging drilling for oil and gas in the United States territories. (See Exhibit 8 attached, please find a document I drafted and sent to federal law makers in hopes to prevent the destruction of our environment triggered by Defendant’s related executive orders, which would in turn cause desperate conditions, tempting folks to sin.)

290. According to worldometer, coal, gas and oil will run out in a calculated number of years. (See, https://www.worldometers.info/).

291. Accordingly, investing in energy that will run out is not a wise monetary investment, nor does it serve the lives and health of the American people or our environment.

292. I believe Defendant's dirty energy policies serve Satan by "kill(ing), steal(ing) and destroy(ing)" lives to serve Defendant's self-gain by barter or exchange, even gaining personal loyalty by those who profit by such dirty energy dealings. (Citing, John 10:10, "The thief comes only to steal and kill and destroy; I have come that they may have life, and have it to the full.")

V. SPECIFIC EXAMPLES WHERE DEFENDANT CREATES THE ILLUSSION OF SUPPORTING CHRISTIANITY, THEREBY SUPPRESSING OTHER DIFFERENT BELIEFS, INCLUDING MY BELIEFS IN CHRISTIANITY THEREBY MISLEADING PEOPLE I LOVE TO HELL, DESTROYING SEPARATION OF CHURCH AND STATE, MAKING US ALL LESS FREE

A. APPOINTMENT OF PERSONAL SPIRITUAL ADVISOR, AND ALLEGED CHRISTIAN LEADERS ADVIZING THE DEFENDANT CREATING THE APPEARANCE OF SUPPORT OF CHRISTIANITY

293. Plaintiff, Meghan Kelly, repeats and incorporates by reference all of the above paragraphs and all of the below paragraphs, and the Exhibits and citations, the paragraphs refer to herein as admissible under nonhearsay and hearsay exceptions, including but not necessarily limited to, probative fact, state of mind, belief, present sense impression, periodical exception, excited utterance, admission by party opponent, as though set forth herein in the first instance.

294. Defendant Trump is misleading people I love to hell by appearing to buy church support, or apparent backing by God or apparent support of God, by bartering favors by allowing influence in his cabinet by certain Christian leaders, and by signing an executive order allegedly making it easier for churches and other religious groups to engage in politics without endangering their tax-exempt status. (See, Trump eases ban on political activity by churches, By Jordan Fabian and Naomi and Jagoda, 05/04/17 11:58 AM EDT, https://thehill.com/homenews/administration/331902-trump-eases-ban-on-political-activity-by churches#:~:text=President%20Trump%20signed%20an%20executive%20order%20Thursday%20making,organizations%20during%20a%20National%20Day%20of%20Prayer%20event.)

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

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

296. Paula White, heads the "White House's Faith and Opportunity Initiative, a successor to previous administrations' faith-based office that coordinates outreach to religious communities." (Citing, Religious News Service, Paula White to head Trump's faith office, by Jack Jenkins and Adelle M. Banks, November 1, 2019, https://religionnews.com/2019/11/01/paula-white-to-head-trumps-faith-office/?utm_source=RNS+Updates&utm_campaign=98de8ad604-EMAIL_CAMPAIGN_2019_01_09_06_29_COPY_02&utm_medium=email&utm_term=0_c5356cb657-98de8ad604-116936653).

297. The following Christian leaders, in their capacity as spiritual advisors, allegedly are members, or were members of the Defendant's advisory board, according to the National Catholic Reporter; Gary Bauer, Mark Burns, Tim Clinton, James Dobson, Jordan Easley, Jerry Falwell Jr., Ronnie Floyd, Jack Graham, Rodney Howard-Browne, Harry Jackson, Robert Jeffress, Richard Land, Greg Laurie, Eric Metaxas, Johnnie Moore, Frank Page, Tony Perkins, Ralph Reed, Tony Suarez, and Paula White. (Citing, National Catholic Reporter, The key

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

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

B. HOLDING UP A BIBLE IN FRONT OF A CHURCH

299. In early June, the Defendant held up a bible as he posed for a photo outside the damaged St. John's Episcopal Church located at Lafayette Square, on the same day government agents tear gassed protestors.

300. This act of holding up a religious symbol, the Word of God misleads many folks I love to believe supporting Trump's misbehavior, also known as sins, such as the use of violence, such as government violent persecution by gassing protestors while exercising their freedom of association and speech, supports God.

301. This act of holding up the bible misleads people I love to believe the Defendant is receiving the backing of God.

302. Trump violated the establishment clause by creating the appearance of supporting a religion, thereby chilling the views of those with diverse views, while encouraging a false belief in Jesus's teachings, and turning others who do not believe in Jesus away from Christianity.

303. The act of holding up the bible misleads people I love to believe Trump's sinful behavior is okay or even cleansed by God when it is not, without repentance.

304. This act misleads people I love to believe sin is ok, when sin leads to the second death, loss of eternal life without repentance. (Luke 13:3, "But unless you repent, you too will all perish," meaning in hell, the second final death); (Luke 13:5, "I tell you, Nay: but, except ye repent, ye shall all likewise perish.")

305. I love all people including my enemies, and those I do not know. So, even if one person is misled by remaining under the deception of Defendant's use of religion for his own vanity, use of the Bible, the Word of God, religion, for his own purpose in place of God under the guise of serving God, I face harm at losing the opportunity to feel a fuller type of love with them on judgment day.

306. Trump appeared to support the religion Christianity by holding up the bible, and other activity discussed herein, creating the communication of state sponsored religion.

307. The Defendant told Fox News, "'I think it was a beautiful picture, … And I'll tell you, I think Christians think it was a beautiful picture.'" (Citing, Fox News, Trump responds to Milley apology for Lafayette Square photo op, By Brooke Singman, published June 12, 2020, phttps://www.foxnews.com/politics/trump-responds-to-milley-apology-for-lafayette-square-photo-op

308. This activity purports to give Defendant's backing to Christianity, and evidences his desire to be backed by Christians based on their religious beliefs.

309. This activity purports to give God's backing to Trump for using the Word of God, the Bible, to be used for Trump's governing purpose, also known as Trump's vanity under the guise or illusion of a religious purpose.

310. Trump misleads people I love to believe serving sin is serving God, by holding up the Bible.

311. Trump misleads people I love into believing serving greed is serving God when Jesus teaches "You cannot serve God and money." (Citing, Matthew 6:24).

312. I believe those who glorify money gained by barter or exchange, business greed as their heart's desire in place of God's will, will be damned to hell should they not repent. (See, Matthew 7:21, "'Not everyone who says to me, 'Lord,

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

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

314. Trump misleads people I love to hell by teaching the punishments for original sin is the reason to live. I believe the punishments are meant to teach humility leading to salvation instead of pride leading to damnation. The punishments are meant for edification by loving guidance even when we are corrected. The punishments and the pursuit of the fruits of the punishments is not the purpose of our lives.

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

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

316. I place my trust in God. (Psalm 118:9 "It is better to take refuge in the LORD than to trust in princes."); (Psalm 91:2 "I will say of the LORD, "He is my refuge and my fortress, my God in whom I trust.")

317. I believe the purpose to live is more glorious than the punishment or the fruits of the punishments for original sin.

318. I believe the purpose of life is to love because we were created because God loves us, and to gain eternal life by such love, to love God foremost, to love self, and love others as self thereby reflecting the image of God because "God is love." (Citing, 1 John 4:16, 1 John 4:8).

319. The purpose of life is not to reflect the image of Satan by living for self, seeking to be loved when we are already loved by God. (1 John 4:19,"We love because he first loved us.")

C. DEFENDANT HYPOCRITICALLY CLAIMS "BIDEN WILL HURT THE BIBLE" AFTER DEFENDANT HELD THE BIBLE UP FOR HIS OWN VANITY EARLIER THIS SUMMER

320. "President Trump … claimed presumptive Democratic presidential nominee Joe Biden, a practicing Catholic, is 'against God' as he levied a stream of attacks on his likely opponent in the November election." Trump said, standing behind a podium with the presidential seal. 'Hurt the Bible. Hurt God. He's against God...'" (Citing, The Hill, Trump claims Biden is 'against God' and will 'hurt the Bible' By Brett Samuels, 08/06/20 02:45 PM EDT, https://thehill.com/homenews/administration/510900-trump-claims-biden-is-against-god).

321. Defendant wrongfully presumes to be the authority on God while acting with government power, wrongfully persecuting his political opponent's religious identity, and indirectly persecuting his opponent's supporters under the inherent, actual threat of government persecution by ridicule or otherwise.

D. TRUMP PERSECUTES PEOPLE WHO EXERCISED THEIR FREEDOM NOT TO WORSHIP, BY DEMEANING THOSE WHO OMITED THE WORD GOD IN THE PLEDGE OF THE ALLEGIANCE

322. "Trump took to Twitter to accuse Democrats of not uttering the word 'God' in the pledge at (the) Democratic National Convention." (Citing, The Hill, Trump targets Democrats over Pledge of Allegiance, By Tal Axelrod, 08/22/20 11:53 AM EDThttps://thehill.com/homenews/administration/513218-trump-targets-democrats-over-pledge-of-allegiance).

323. Trump tweeted "'The Democrats took the word GOD out of the Pledge of Allegiance at the Democrat National Convention. At first I thought they

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

324. Trump Suppressed the free exercise of religion by condemning the omission of the word God in the pledge of the allegiance, thereby creating a chilling effect of persecuting those who believe differently than the government sponsored belief espoused by the Government agent Defendant President Trump.

325. Defendant violated the freedoms of those he serves by persecuting people who worship or not according to the dictates of their conscience, not the dictates of the Defendant by omitting the Word God in the pledge of the allegiance.

326. Defendant may not lawlessly persecute folks for exercising the freedoms Defendant swore an oath to protect. (See *Lee v. Weisman*, 505 U.S. 577 (1992), "It is beyond dispute that, at minimum, Constitution guarantees that government may not coerce anyone to support or participate in religion or its exercise, or otherwise act in way which establishes state religion or religious faith or tends to do so. U.S.C.A. Const.Amends. 1, 14.")

327. Defendant is not a Godhead.

328. Defendant is a mere man.

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

329. In August, 2020, Defendant Trump improperly shared an alleged talk with his personal deity to a large group of Americans at a rally, while acting under the cloak of government authority as President of the United States. (Citing, HuffPost, Trump Claims COVID-19 Is God Testing Him After He Built 'Greatest Economy In History' The president described boasting to God about his economic successes before the coronavirus pandemic., By Carol Kuruvilla, , 08/17/2020 08:19 pm ET Updated Aug 20, 2020, https://www.huffpost.com/entry/trump-coronavirus-god-testing-him-building-economy_n_5f3af4f3c5b670ab17aec416?guccounter=1&guce_referrer=aHR0cHM6Ly93d3cuYmluZy5jb20v&guce_referrer_sig=AQAAAK_pSPCqwjcLq5y_w0V2uiT1mdFxf_h7AMxQDmAMkHuiYBYGtqCpk_JeegXMdUbqyCbSuFixlTI_h0hGHFFMWNzEDXhCtW7yrSRl9O6qsnA_gX9kpvYMQWvyf3er93TgeTKYe52GkwHXK8XJh1rrlwWMAxMVwVxTNuYbzdP98TeG)

330. Trump told supporters "'You know what that is? That's God testing me,' … "He said, 'You know, you did it once.' And I said, 'Did I do a great job, God? I'm the only one that could do it.' (God) said, 'That you shouldn't say, now we're going to have you do it again.'" Id.

331. "Trump said, 'We built the greatest economy in the history of the world, and now I have to do it again,'" Id.

332. Defendant improperly shared his personal alleged discussion with his deity, with his supporters, thereby creating the illusion Defendant is supported by God or has a relationship with the Christian God, thereby supporting his alleged religious belief while suppressing others.

333. Defendant also violated Jesus's teachings concerning prayer.

334. Jesus taught us we should pray in secret, not to be seen like the hypocrites who have their earthly reward. Our father who hears in secret will reward us openly, I believe on judgment day. (Citing, Matthew 6:5-8.)

335. Jesus even modeled how we should pray by going to lonely places to pray, not to gain the praise of man but of God as he leads us concerning his will. (See, Luke 5:16, "But Jesus often withdrew to lonely places and prayed."); (Matthew 14:23, "After He had sent them away, He went up on the mountain by Himself to pray. When evening came, He was there alone"); (Mark 1:35, "Early in the morning, while it was still dark, Jesus got up and slipped out to a solitary place to pray."); (Luke 3:21, "When all the people were being baptized, Jesus was baptized too. And as He was praying, heaven was opened."); (Luke 6:12, "In those

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

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

336. Trump created an illusion that there was a war on Christmas.

337. The President asked,

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

338. Not all people are Christians.

339. It is wrong to force the Defendant's claimed religious belief upon others.

340. The Defendant is not God.

341. I believe God gives us free will, the choice to accept God's love, salvation and eternal life or to reject God's love by choosing the way to the final death.

342. Trump created the illusion that private citizens were not free to say Merry Christmas.

343. Private citizens are free to say Merry Christmas or not according to the dictates of their own conscience, not the required demands of the government or supporters of the government agent, the Defendant.

344. Government leaders, including Defendant, have more limited rights to support religion and holidays in order not to chill the religious freedoms of those Defendant serves because of the inherent threat by the cloak of government authority.

345. By creating the lie that private citizens could no longer say Merry Christmas, Defendant was supporting one religion and suppressing other Americans' freedom to worship or not according to the dictates of their own conscience not the dictates of the Defendant while acting under the cloak of government authority.

346. There was no war on Christmas.

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

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

348. In June 2020, “CBN News political analyst David Brody asked Trump about the claim that God put him "in office for such a time as this."” Citing, Fox News, ‘I hope it’s true’: Trump responds to claim he was chosen by God, By Caleb Parke, June 25, https://www.foxnews.com/politics/trump-god-appointed-christian-interview).

349. Trump responded, ‘"I almost don't even want to think about it," Trump said. "Because you know what, all I'm gonna do is, I hope it's true. All I'm going to do is, I'm going to do my best."’ Id.

350. According to an article on Fox News, University professors say more churchgoers believe Trump is 'anointed by God', By Caleb Parke, May 13, 2020,

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

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

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

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

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

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

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

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

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

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

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

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

IV. GOVERNMENT SPONSORED PRIVATE PERSECUTION, BUYING LOYALTY BY BARTER OR EXCHANGE, CHURCH DONATIONS FOR A LITTLE SOMETHING DOWN THE LINE SUCH AS BAILOUTS, OR POWER TO PERSUDE POLITICIANS, AT THE COST OF TEACHING SOME PREACHERS TO PERSECUTE LIBERALS LIKE ME, SINCE I DO NOT SUPPORT THOSE WHO SUPPORT THEIR POCKETS OR POLITICAL POWER

356. On or about, May 4, 2017, President Trump signed into law Ex. Or. No. 13798, 82 Fed. Reg. 21675. (See, Exhibit 9).

357. The President's Executive order allows churches to donate to political campaigns who align their interest with the President’s interest.

358. I have noticed some preachers teach opposition towards liberals like me, causing economic, social and political persecution based on I believe government sponsored support.

359. I have listened to preachers condemn or put down “liberals” when God loves all people, even liberal democrats like me.

360. People have accused me of not being a Christian when I told them I am a democrat. They have also said “you can not be a democrat and a Christian too.”

361. I am a Christian.

362. I am a Democrat too.

363. I believe strangers learned wrong because Defendant and those he exploits by supporting state sponsored private persecution teach them wrong, misleading them.

364. I believe the unholy union of church and state the Defendant magnifies is purposely made to increase government sponsored private religious persecution towards me and others who do not support Defendant's interest, to serve Defendant's political gain.

365. Regardless of intent, the result of the unholy union of church and state the Defendant creates is in fact generating government sponsored private religious persecution towards me and others.

366. Trump misleads religious people in churches who desire power, worldly influence and money or favors traded more than the true treasure God in the heart's of man.

367. Trump's executive order tempts church leaders to go on the path to hell by seeking to gain the world, by bought or bartered for political influence and power, only to lose their soul. (See, Mark 8:36 "What good is it for someone to gain the whole world, yet forfeit their soul?")

368. Trump's executive order allows religious institutions to buy or barter loyalty with those who align with Defendant's interests, in exchange for something down the line such as bailouts, or power to persuade politicians, at the cost of teaching some preachers and Christians to persecute liberals like me, since I do not support those who serve their pockets or political power. (See, CBS News, *More than 12,000 Catholic churches in the U.S. applied for PPP loans – and 9,000 got them*, By Christina Capatides, MAY 8, 2020 / 12:17 PM, https://www.cbsnews.com/news/catholic-churches-paycheck-protection-program-12000-applied-9000-got/); (Also see, the Hill, *Thousands of Catholic churches received PPP loans: report*, By Lauren Vella - 05/08/20 11:14 AM, https://thehill.com/homenews/news/496781-thousands-of-us-catholic-churches-received-ppp-loans-amid-coronavirus-report).

369. Trump's executive order has had the effect of substantially burdening my religious exercise, and substantially burdens the religious freedoms of others who believe or think differently.

370. Defendant cannot demonstrate "the application of the burden to me;

"(1) is in furtherance of a compelling governmental interest; and

(2) is the least restrictive means of furthering that compelling governmental interest." (Citing, 42 USCS § 2000bb-1 (b)(1)(2)).

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

V. SUBSTANTIALLY BURDENING PLAINTIFF'S FREE EXERERCISE OF RELIGIOUS BELIEF VIA CHILLING HER SPEECH BY CREATING THE ILLUSION PLAINTIFF DOES NOT KNOW GOD BECAUSE SHE DOES NOT SUPPORT THE DEFENDANT

372. Many Americans appear to remain under the unholy deception that political loyalty to Defendant, is loyalty to God, and any dissident to Defendant's policies or misbehavior, by me, or those like me, is an attack to their God.

373. As a result, I personally received persecution sponsored by the Defendant's illusion that Defendant is not only a political governing authority, but also a Godhead too.

374. I do believe in Jesus Christ and I am a Christian, despite the fact others deem me not because I do not support the President's lawless misbehavior.

375. My freedom of religion to share the way to eternal life is substantially burdened by Defendant's government sponsored illusion of government combined with God or religious authority to reign ("illusion").

376. I believe these attacks against my faith and against my political affiliation based on faith are caused by the Defendant's illusion.

377. I recall more than one stranger accusing me of not being a Christian as soon as I criticized the Defendant, chilling my religious belief in sharing God's truth, and thereby, substantially burdening my religious exercise, by preventing me from fully obeying God by spreading the gospel, which includes teaching God's message, about justice, mercy, and love for humanity not exploitation and harm towards humanity to serve greed, even when I do not cite Jesus, God or religion.

378. I recall someone saying they heard I eat babies, in response to my opposition supported with biblical references towards Defendant's policies.

379. This was painful given the historical context. During the rise of Christianity, people feared Christians. I believe they were taught to fear them by those with money, connections or authority, who exploited the people for money, since Christianity teaches love for humanity and against the oppression, exploitation and indifference towards harming other people to serve greed.

380. During the rise of Christianity, people shared false rumors that Christians were baby eaters by twisting the symbolic sharing of bread and wine, "do(ing) this in memory of (Jesus)," which is called communion. (Citing, Luke 22:19, 1 Corinthians 11:24, 1 Corinthians 11:25, relating to "do this in memory of me.")

381. I believe Jesus uses communion to teach us, "we do not live by bread alone, but by every word of God." (Citing, Deuteronomy 8:3, Matthew 4:4, Luke 4:4, "We do not live by bread alone but by every word of God.")

382. I believe Jesus Christ's words nourish our mind, heart and soul, giving eternal life. "We do not live by bread alone, but by every word of God." Id.

383. I believe the word of God gives eternal life by teaching us we are loved and to love.

384. I believe the way of love as God teaches, not as the evil world teaches, replacing love with selfish lusts. (See 1 John 5:19, We know that we are children of God, and that the whole world is under the control of the evil one.")

385. I believe God teaches the way to escape the final death.

386. I remember exiting the conversation after someone called me a baby eater, while I think I may have noted I am a vegetarian, thereby chilling my

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

387. I also remember posting bible quotes to show my disapproval of Defendant President Trump's decisions on federal legislators facebook comments.

388. I remember someone responded "I don't know God" in the comments.

389. Instead of continuing in legal debate concerning just laws and just policies, which I believe is what God teaches may be used to save souls from hell while preventing and healing harm done here, I discontinued from participating in the discussion, thereby substantially burdening my religious practice of living the Word of God too by preventing harm and damnation in hell. (See, 2 Corinthians 3:2-3, "You yourselves are our letter, written on our hearts, known and read by everyone. You show that you are a letter from Christ, the result of our ministry, written not with ink but with the Spirit of the living God, not on tablets of stone but on tablets of human hearts.")

390. I believe God clearly teaches the difference between unjust decrees that lead people to harm and hell and just laws that prevent harm in this life and the next.

391. Unjust decrees teach love of money, encouraging people to harm one another to serve greed, while rewarding the one who gained the unjust gains.

392. Just laws, teach love or concern for humanity. Just laws correct people when they harm, oppress or exploit people to serve business greed.

393. I believe just laws have the power to not only save lives, but eternal lives.

394. Just laws heal victims of inequity while reducing the temptation for potential wrongdoers to sin by loving money, thereby saving people from hell, since Jesus says you cannot serve God and money.

395. Just laws instill hope, never giving up on the parties the Court corrects.

396. Just laws transform wrong doers into right doers.

397. I see some of our Constitutional limits on government as just limits, just laws, including the freedom to worship or not according to the dictates of our conscience, not the dictates of the Government through the Government agent the Defendant acting under the cloak of government authority as President of the United States.

398. Strangers have told me I cannot be a Christian because I am a democrat to my face too, chilling my religious belief in sharing God's truth, substantially burdening my religion by preventing me from fully obeying God by "spreading the gospel." (See, Mark 13:10, Luke 9:2, 2 Corinthians 8:18, Philippians 1:12, 1 Corinthians 9:16-18, Romans 1:1, Philippians 4:15, Galatians 2:2, Ephesians 6:15.)

399. I remember being hurt because I love God, and part of my faith is obeying Jesus by loving others by teaching them the way to escape hell, by teaching them to love others as themselves.

400. If people think I do not believe Jesus, they won't accept God's guidance through me by my pointing to the word, including the lessons and reasons behind God's words.

401. I believe I am commanded by God to spread the word. Yet, my religious exercise has been substantially burdened under the illusion Defendant created that liberals or democrats like me do not support Jesus. I am so sad.

402. I also recall people making jokes that are not funny. My faith is not a joke. I believe Jesus Christ.

403. I remember people telling me I was not a real Christian since I am Catholic too.

404. I am a real Christian.

405. Such comments towards me based on my religious and personal beliefs concerning Defendant has certainly chilled my free exercise of religion in the open.

406. I recall, Will Chandler, who I lovingly call the former king of corporate law's son, the former Chancellor's son, and a friend at the gym, citing "Romans" concerning obeying authority when I criticized Defendant's alleged lawless policies, thereby indicating I was misbehaving by not following God by not supporting Defendant.

407. I think my friend, Will Chandler, was citing to Romans Chapter 13 relating to obeying government authority. My friend did not grasp that not all laws are weighted the same in the bible.

408. Just like the Constitution preempts treaties, executive orders and federal laws which conflict, God's commandments also are preempted by the two greatest commands, Love God foremost and love one another subordinately.

409. Also note, Jesus told Pilate that the ones handing you over are guilty of a greater sin, meaning those who handed Jesus Christ over to the Court for prosecution broke a more important law, than Pilate, the judge. (Citing, John 19:11.)

410. My friend also did not grasp that just because God allows evil, it doesn't mean God willed evil.

411. We all have power to choose to be driven by our evil, loveless, selfish, desires to live for our own, or to choose to lay down our lives by loving God by exercising self control, by considering the impact of our decisions or lack thereof, upon others, even those outside of our own.

412. Just because people, like the devil in Job, have the power to do evil and so do evil, does not mean it is God's will that evil is done.

413. God affords us the power to choose, by using our brain, our mind for good by love, or evil by absence of love. Please note, I believe people go to hell for confusing lusts for love. Not knowing is not okay but is guilt to God for not caring to use your brain, to think, to care, to love.

414. That is why I think Jesus tells us to pray that God's will be done. I know I need guidance by God to understand God's will and humbly praying that we may do his will is nice. (Citing Matthew 10:6, "your kingdom come, your will be done, on earth as it is in heaven.")

415. I also recall my friend Will Chandler indicating sin was all women's fault, a different time at the gym. He said it was all Eve's fault.

416. Will's statement conflicted with scripture and was sadly supported by Defendant's demeaning words and treatment towards women under the cloak of government authority combined in the unlawful union with the cloak of religion, making him a misbehaving perceived Godhead, misguiding people I love to harm and hell.

417. Romans 5:12 provides, "sin entered the world through one man, and death through sin, and in this way death came to all people, because all sinned."

418. Scripture did not blame Eve, per my friend's statement and jokes that were not funny because I know he believes it, and teaches others to believe the same.

419. I believe people go to hell for thinking evil thoughts. (Matthew 5:22, Jesus said, "anyone who is angry with a brother or sister will be subject to judgment.")

420. I believe Defendant is misleading my friend, Will Chandler and his beautiful wife, Leah Chandler to hell, by teaching ugly thinking is Godly, and by failing to correct sinful thinking, by instead encouraging it under the cloak of Godliness and Government authority.

421. My beautiful friend, Leah Chandler, who I lovingly called the lovely law librarian is now Judge Leah Chandler of the J.P. Court, Will Chandler's wife.

422. She is not allowed to talk about religion or politics now since she became a judge.

423. But in private, before she became a judge, she indicated her difficulty in believing in a God who could sacrifice his child or encourage the sacrifice of Abraham's child, Isaac.

424. I also believe her husband's misguided beliefs on Christianity due to Defendant's encouragement and mis-leadership turns her away from salvation through God's love, since Will Chandler does not honor his wife or women by blaming Eve and women for sin.

425. Defendant does not lay down his will, his desires, to do the will of God by his love for others as himself.

426. I believe Defendant models behavior that misleads others to hell as our nation's leader, and as a perceived divine leader.

427. Leah Chandler and Will Chandler also declared their support for the Defendant, at least up until the last time I spoke with them.

428. I believe the Defendant misbehaves and misguides people I love to hell by modeling misbehavior to hell.

429. I believe my loved ones, Leah Chandler and William Chandler will go to hell if they continue to be deceived by the Defendant's encouragement of believing evil is good under the guise of Godliness.

430. I notice other loved ones in the community, I think of as Bible boys gone wild, who are deceived by the Defendant, into glorifying business greed, pride, or violence, while claiming to support Defendant and God, despite the fact I believe my God teaches love of money, pride and violence is wrong.

431. For instance, I notice my former grade school, schoolmate Sheldon Hudson, a government employee, Town Manager of Millsboro, located in Delaware, glorify business greed, Defendant President Donald Trump and God, thereby contributing to the illusion that supporting business greed and President Trump is Godly.

432. I believe my friend, Sheldon Hudson, will go to hell because he is deceived by the Defendant and by those the Defendant deceives into thinking business greed is good and Godly, unless he repents of such evil thinking.

433. I believe this court has the power to be not only a life saver, but an eternal life saver by safeguarding separation of church and state so Americans may worship or not according to the dictates of our conscience, not the dictates of the

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

COUNT 1

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

434. Plaintiff, Meghan Kelly, repeats and incorporates by reference all of the above paragraphs and all of the below paragraphs, and the Exhibits and citations, the paragraphs refer to herein as admissible under nonhearsay and hearsay exceptions, including but not necessarily limited to, probative fact, state of mind, belief, present sense impression, periodical exception, excited utterance, admission by party opponent, as though set forth herein in the first instance.

435. The First Amendment provides in part: "Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof." (emphasis intended)." (U.S. Const. amend. I.)

436. The Defendant, acting in his official capacity as the President of the United States, has established the illusion of government sponsored or government backed religion or religious beliefs, by personally creating the appearance of supporting one perceived religious group through a series of collective behavior,

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

437. The Defendant, acting in his official capacity as the President of the United States, also governs through the illusion of religious authority, in an unholy union where religion is publicly used for Defendant's vanity, meaning Defendant's political and personal purpose in violation of the 1st and 5th Amendments, instead of maintaining separation of church and state.

438. Defendant, acting in his official capacity as the President of the United States openly accepts perceived or projected combined religious and political support from alleged Christians, creating the appearance that Defendant is not only a political leader, but a religious leader as well, in violation of the Establishment Clause applicable to the Defendant via the 5th Amendment.

439. The US Supreme Court held the "Establishment clause, at very least, prohibits government from appearing to take position on questions of religious belief or from making adherence to religion relevant in any way to person's standing in political community." (County of Allegheny v. American Civil

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

440. The Lemons test is not necessarily required under the facts of this Count which applies to laws passed, or government agents executing laws passed which may be unconstitutionally applied or unconstitutional on their face which is distinguished from the present case. (Citing, Lemon v. Kurtzman, 403 U.S. 602, 91 S.Ct. 2105, 29 L.Ed.2d 745.); (Also see Lee v. Weisman, 505 U.S. 577 (1992), where the Supreme Court held, "Reassessment of decision in Lemon v. Kurtzman, which set forth standards for evaluation of establishment clause cases, was not required in order to determine whether "nonsectarian" prayer could be offered at school graduation; "pervasive" degree of government involvement with religious activity in present case, to point of creating state-sponsored and state-directed religious exercise in public school, was sufficient to determine constitutionality without reference to Lemon test. U.S.C.A. Const.Amends. 1, 14.")

441. Defendant as the chief executing authority, as the President of the United States, charged with executing laws, lawlessly acts, without foundation for any of his violations in statutory law, albeit, with the possible exception of Ex. Or. No. 13798 of May 4, 2017, 82 Fed. Reg. 21675, and possibly other executive orders that are not the focus of this cause of action.

442. Instead, Defendant behaves as a law unto himself.

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

COUNT II

FREE EXERCISE CLAUSE DEFENDANT SUBSTANTIALLY BURDENED PLAINTIFF'S FREE EXERCISE OF RELIGION IN VIOLATION OF 42 USC §§ 2000bb — 2000bb-4, and THE 1st AMENDMENT APPLICABLE TO DEFENDANT VIA THE 5TH AMENDMENT

444. Plaintiff, Meghan Kelly, repeats and incorporates by reference all of the above paragraphs and all of the below paragraphs, and the Exhibits and citations, the paragraphs refer to herein as admissible under nonhearsay and hearsay exceptions, including but not necessarily limited to, probative fact, state of mind, belief, present sense impression, periodical exception, excited utterance, admission by party opponent, as though set forth herein in the first instance.

445. Many Americans appear to remain under the unholy deception that political loyalty to Defendant, is loyalty to God, and any dissident to Defendant's policies or misbehavior, by me, or those like me, is an attack to their God.

446. I personally face persecution sponsored by the Defendant's illusion that Defendant is not only a political governing authority, but also a Godhead too, for exercising my free exercise of religion.

447. I also receive eternal harm because I believe those deceived by the Defendant's illusion of religious governing authority will not receive eternal life in heaven.

448. Every day, the Defendant exploits and encourages the illusion of religious governing authority by supporting one perceived religious belief, or suppressing different religious beliefs, my freedom to exercise my faith is substantially burdened by threat of persecution by private citizens who believe supporting Defendant supports God.

449. Every day, the Defendant exploits and encourages the illusion of religious governing authority by supporting one perceived religious belief or suppressing different religious beliefs, my freedom to exercise my faith is substantially burdened by threat of persecution by private citizens who believe supporting my God and my religion is evil since the Defendant's support of the Bible and God makes it appear Christians misbehave like the Defendant.

450. My free exercise of religion by seeking to feel a fuller type of love in heaven with those the Defendant misleads and deceives to damnation is substantially burdened by Defendant's excessive entanglement of religion with government in violation of the 1st Amendment applicable to the Defendant via the 5th Amendment and in violation of 42 USC §§ 2000bb — 2000bb-4.

451. My free exercise of religion to spread the word without government sponsored private bought or bartered for private persecution is substantially burdened and chilled.

452. The Defendant sells deception, lies, as truth, I believe misleading many to harm and hell, as they accept the illusion in place of truth.

453. Infringement of First Amendment rights are generally not compensable by money damages and are, therefore considered irreparable, as freedoms.

454. The harm noted herein, such as the suppression of my freedom to worship or not according to the dictates of my conscience without government sponsored persecution is certainly irreparable.

455. Given the fundamental rights at issue here, and the requirement that the Defendant must prove his violations are "in furtherance of a compelling governmental interest; and the least restrictive means of furthering that compelling governmental interest," somehow more important than Plaintiff's freedom to freely exercise her religion without government sponsored persecution, I have a high likelihood of success on the merits of my claim. 42 USCS § 2000bb-1(b)(1)(2).

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

COUNT III

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

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

458. Defendant passed executive order 13798 of May 4, 2017, 82 Fed. Reg. 21675 (herein also referred to "executive order"), allowing religious entities to donate to political campaigns without losing their tax free status.

459. Defendant's executive order allows religious groups to buy favors or loyalty through donations to those in power or those seeking government power.

460. Buying power or bartering for power by granting churches the ability to donate to politicians and political groups, with money or donations parishioners gave churches or religious entities, to seek the churches' self gain, material gain,

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

461. The cost of permitting payments via donations or support to politicians by religious organizations via the executive order is suppressing my Constitutionally protected freedom to worship or not according to the dictates of my conscience, not the dictates of government backed religious organizations, under threat of government sponsored private persecution or actual government persecution.

462. The cost of selling religious organizations power and influence through the executive order is essentially allowing the Defendant to sell what is not his, the freedoms of Americans from enslavement to the governing class's religious dictates under the threat of government backed persecution.

463. Churches and religious entities who donate to politicians or political groups, reasonably perceive the politicians or political groups owe the entities a benefit, such as loyalty to certain ideas.

464. The executive order creates a bought or bartered for religious interest in religious organizations supporting politicians.

465. As a result, some members of religious groups have taught parishioners to persecute those who do not align with the religious group's political interests, as not a genuine Christian.

466. The executive order creates a bought or bartered for political interest in political organizations supporting religious groups.

467. Churches and religious entities who donate are tempted to be biased and loyal to those they support because they reasonably perceive such politicians or political groups as owing the religious entities a benefit, such as loyalty to certain ideas.

468. As a result of this inherent bias or loyalty of religious organizations to serve those who serve them thereby serving themselves, (which I believe reflects the image of Satan), members of religious groups have taught parishioners to persecute those who do not align with the religious group's political interests, distinguished from religious interests, as not a genuine Christian.

469. I have faced increased government sponsored private persecution as a liberal Christian as a result of the implementation of the executive order.

470. My free exercise has been in effect substantially burdened by the application of the executive order.

471. What constitutes an "establishment of religion" is often governed under the three-part test set forth by the U.S. Supreme Court in Lemon v. Kurtzman, 403 U.S. 602 (1971). Under the "Lemon" test, government can assist religion only if (1) the primary purpose of the assistance is secular, (2) the assistance must neither promote nor inhibit religion, and (3) there is no excessive entanglement between church and state.

472. Here, the primary purpose of the executive order is not free speech, but bought or bartered for religious political speech used to influence elections via campaign donations or support.

473. The alleged secular speech cannot be divided from the unholy union tempting religious groups to seek their own power and profit in place of a true religious purpose, in exchange for donating or supporting the candidates who have the power to grant them their desires.

474. The executive order is using religion and religious groups for politician’s vanity, meaning political purpose, creating an unnatural religious loyalty to party and people within a party by the religious groups who barter or buy loyalty, through donations or support.

475. The executive order has the impact of promoting religions which align with political beliefs and inhibiting religions who do not align with such political beliefs.

476. The executive order encourages and exacerbates excessive entanglement between church and state.

477. I believe the executive order not only violates the establishment clause of the first amendment applicable to Defendant via the 5th and 42 USC §§ 2000bb — 2000bb-4, but it also tempts Christians and churches to sin against God by using God's name in vain, for man's purpose in place of God's will, misleading many to harm and hell.

478. Defendant has promoted a religion, a type of Christianity, that I believe does not align with God's teachings.

479. Defendant has facilitated bail outs to religious entities or churches with business bail out money, which creates an unnatural religious, whored loyalty to Defendant in exchange for the hope of future donations to Defendant, or members of the Defendant's party, the Republican party with the expectation that churches are taken care of with profit and power which is wrong because it compromises politician's focus on caring for the people they are charged to serve,

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

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

PRAYER FOR RELIEF

WHEREFORE, Meghan Kelly respectfully requests that this Honorable Court:

1. Enter an Order permanently enjoining and restraining the Defendant from forcing religious views or sponsoring religion, while employed as the President of the United States, so as not to substantially burden Plaintiff's free exercise of religion.

2. Enter an Order permanently enjoining and restraining the Defendant, the President of the United States, from persecuting those with diverse religious beliefs, based on such perceived religious beliefs, while acting as the President of the United States.

3. Enter an Order the Defendant shall award Plaintiff costs to the extent authorized by law or Court rule, and other such relief as the Court deems proper and just, if applicable.

4. Grant any injunctive or other relief that this Court deems just, equitable, and proper.

Dated: _____

PRO SE

/s/Meghan Kelly
Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
Bar Number 4968
(Word Count)

Exhibit M

(yes I messed up on the caption inadvertantly)

IN THE CHANCERY COURT OF THE STATE OF DELAWARE, SUSSEX COUNTY

Meghan Kelly	Civil Action No.:
Plaintiff,	
v.	
The Democratic Chair, Erik Raser-Schramm, a.k.a. Erik Schramm Individually, and in his capacity as The Chairman of the Democratic Party for the State of Delaware, Anthony Albence, individually, and in his capacity as The Election Commissioner of the State of Delaware Department of Elections, Kathleen Jennings, individually, and in her capacity as Attorney General of the State of Delaware, the Delaware Department of Elections, Sussex County Department of Elections, Kent County Department of Elections, New Castle County Department of Elections, and The Democratic Party of the State of Delaware, a.k.a. The Delaware State Committee, a.k.a. The State Executive Committee, a.k.a. The Democratic Party State Executive Committee, a.k.a. The Executive Committee of The Democratic party	
Defendants.	

PLAINTIFF'S CASE FOR CHRIST,
PLAINTIFF'S COMPLAINT AGAINST DEFENDANTS FOR THEIR VIOLATION OF THE EQUAL PROTECTIONS CLAUSE, IN THIS CLASS OF ONE, UNDER THE 1ST AMENDMENT APPLICABLE TO THE DEFENDANTS VIA THE 14TH AMENDMENT, FOR DEFENDANTS UNLAWFUL APPLICATION OF 15 DEL.C. § 3103, CONDITIONING PLAINTIFF'S RIGHT TO RUN TO OFFICE,
ON THE EMILINATATION OF OTHER
FUNDAMENTAL RIGHTS, AS APPLIED TO PLAINTIFF

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

THE PARTIES

1. Meghan Kelly (also referred herein as, "Meghan," "Plaintiff," "I," or "me," or "my" or "myself" also "she" and "her") is an adult resident of the state of Delaware, residing at 34012 Shawnee Drive, Dagsboro, DE 19939.

2. Defendant Erik Raser-Schramm, in his individual capacity, and in his official capacity as Chairman of the Democratic Party a.k.a. Democratic Chair ("Party Chair" and collectively, "Defendants") is a Delaware resident. The Party Chair may be served at the Democratic headquarters, a.k.a. his place of business, at, The Democratic Party of the State of Delaware, 9 E. Commons Blvd., Suite 2, New Castle, DE 19720. He may be served at C/O, The Democratic Party of the State of Delaware, 9 E. Commons Blvd., Suite 2, New Castle, DE 19720.

3. Defendant Election Commissioner of the State, Anthony Albence, (Individually “Commissioner” and collectively, “Defendants”), in his personal capacity and in his capacity as Election Commissioner, is a resident of the state of Delaware, whose place of business is at 905 S. Governors Ave Suite 170 Dover DE 19904. He may be served at 905 S. Governors Ave Suite 170, Dover DE 19904.

4. Defendant Kathleen Jennings, (Individually “AG,” and collectively “Defendants”), in her personal capacity and in her capacity as the Attorney General for the State of Delaware, whose place of business is located at Carvel State Building 820 N.

French St., Wilmington, DE 19801. She may be served at Building 820 N. French St., Wilmington, DE 19801.

5. Defendant Delaware Department of Elections (Collectively, "Defendants"), has an address of 905 S. Governors Ave Suite 170 Dover DE 19904.

6. Defendant Sussex County Department of Elections (Collectively, the "Defendants"), has an address of 119 N Race St, Georgetown, DE 19947.

7. Defendant Kent County Department of Elections (Collectively, "the Defendants"), has an address of 905 S. Governors Ave Suite 170 Dover DE 19904.

8. Defendant New Castle County Department of Elections (Collectively, the Defendants"), has an address of 820 N French St Ste 400, Wilmington, DE 19801.

9. Defendant Democratic Party of the State of Delaware, a.k.a. the Delaware State Committee, a.k.a. the State Executive Committee, a.k.a. the Democratic Party State Executive, Committee, a.k.a. the Executive Committee of the Democratic Party, (the "Party" and the "Committee" and collectively, the "Defendants"), The Delaware Democratic Party located at 9 E. Commons Blvd., Suite 2, New Castle, DE 19720.

JURISDICTION

10. This Honorable Court has jurisdiction over Plaintiff's claims pursuant to *10 Del. C. Section 341*.

11. This Honorable Court has personal jurisdiction over Defendants because Defendants are Delaware residents.

12. Defendants regularly conduct government business in this state and claims against Defendants arise from Defendants' government business transactions in the state of Delaware.

FACTS

I. PROCEDURAL AND LEGAL FACTS

13. This case arises upon the Defendants' unconstitutional condition precedent requiring Meghan Kelly to violate her religious beliefs, her belief in Jesus Christ's teachings, by conforming with the filing fee and or signature requirements pursuant to *15 Del.C. § 3103 (a)(1)(c),(d),* in order to be placed on the ballot as a democratic candidate for the U.S. House of representative seat in the state of Delaware for the upcoming election, in violation of Meghan Kelly's first Amendment Rights, applicable to the Defendants pursuant to the Fourteenth Amendment under the Equal Protections Clause of the Constitution, in this class of one, as applied to Meghan, including her right(s) of free exercise of religion, speech, association, and right to run for office without disobeying Jesus, thereby compromising her faith and in doing so, essentially selling her soul to Satan to gain the world. (See Exhibit 1, *15 Del. C. § 3103*)

14. The Constitution preempts conflicting state and local laws and regulations.

15. The Defendants must overcome strict scrutiny to defeat Meghan Kelly's claims, in this class of one, under the Equal Protections Clause Applicable to Defendants under the Fourteenth Amendment.

16. The Equal Protections applies where a law treats a person or class of persons differently from others. An Equal Protections claim, may be brought with as few members as one. (See, *Village of Willowbrook v. Grace,* 528 US 562 (2000)).

17. Where a law limits fundamental rights, strict scrutiny will be applied, and the law, or other government action, will be upheld only if it is necessary to promote a compelling or overriding interest.

18. All fundamental rights including the rights I seek to uphold here, including but not necessarily limited to, the right to run for office related to the right to vote, according to the dictates of my own conscience, not the dictates of the government, or agents acting with under the cloak of government authority or power, and the freedom to worship or not according to the dictates of my own conscience, not the dictates of the government or agents acting with under the cloak of government authority or power, the freedom to speak or not to speak according to the dictates of my own conscience, not the dictates of the government or agents acting with under the cloak of government authority or power, and the freedom to associate or not, according to the dictates of my own conscience, not the dictates of the government or agents acting with under the cloak of government authority or power are at issue.

19. The Party's and the Party Chair's conduct is so entangled with the government's function, to be considered government conduct.

20. The Party and Party Chair must be considered as agents of the government, acting with under the cloak of government authority or power.

21. With the cloak of government power, the Constitution, and our laws derived from the Constitution, limit the freedoms of those in government, or acting under the cloak of government authority, such as the Party and the Party Chair, in order not to chill the freedoms of those they serve. The Constitution in this manner makes the common man more powerful than those in positions of government authority.

22. So, I understand, once I am in office I will have fewer freedoms to speak about my belief in Jesus Christ than I do now in order not to chill the freedoms of those I hope to serve. I am just not willing to disobey Jesus to gain an election seat.

23. The Party 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."). (See, Exhibit 2).

24. The Honorable Delaware 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)"). (See, Exhibit 3).

25. The Party Chair and the Party has chosen not to exercise their authority to grant such waiver as mandated under the Constitution, in utter disregard to Meghan Kelly's religious waiver request, thereby essentially persecuting her based on her faith in Jesus Christ.

26. Similarly, the other Defendants, including but not limited to the Commissioner and the Delaware Department of Elections also refuse to comply with the Constitution by waiving the filing fee and signature requirements by entering her filing form as complete, thereby essentially persecution Meghan Kelly based on her free exercise of religion.

27. The Honorable Third Circuit Court, in *Belitskus v. Pizzingrilli*, 343 F.3d 632 (3d Cir. 2003) held, "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."). (See, Exhibit 4).

28. "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 only reasonable, nondiscriminatory restrictions upon the First and Fourteenth Amendment rights of voters, 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)." This case is distinguished since the sole issue is based on Meghan Kelly's free exercise of her religious beliefs, which also affects her free exercise of speech, association and rights associated with her candidacy for office in this case. Yet, this Court's analysis of the "capable of repetition, yet evading review" doctrine applies to the case at hand). *Id.*

29. On or about October 28, 2019, Meghan Kelly sent the State Chair, a representative of the Democratic party, Jesse Chaderon ("Jesse"), the Party through the State Chair and Jesse, the Delaware Department of Elections an email through a representative of the Delaware Department of Elections, Kenneth A. McDowell

(hereinafter referred to as "Bo," in his capacity as an agent of the Delaware Department of Elections, and not in his personal capacity), and additional people not relevant to this case, my request for a waiver from signature and or filing fee requirements, so as not to violate my religion, freedom of speech, and freedom of association, in order to be placed for on a ballot for the upcoming election for the US House of Representatives, via an email containing 4 attachments, including a letter to the Honorable Democratic Chair Erik Raser-Schramm, officially making this request. (See, Exhibit 5, the Email and the attachments thereto including, Exhibit 5, A, the Letter and attachments to the Honorable Party Chair, Exhibit 5, B, (*excluding the attachments to the letters in 5A and 5B and attaching the same as Exhibits 21-29 herein to conserve paper and removing the old exhibit pages and removing the old exhibit pages *), the US Supreme Court letter and attachments, Exhibit 5, C, The US Supreme Court Response, Exhibit 5, D, the Attorney Grievance Commission of Maryland's determination relating to Justice Kavanaugh).

30. On October 28, 2019, Bo kindly responded back to my Email to confirm, I was no longer seeking to run for President of the United States. (See, Exhibit 6, Bo's email, Exhibit 6, A, Emails to Defendant Delaware Department of Elections relating to Plaintiff running for President, Exhibit 6, B, an Email to Jesse and the Party and the Party Chair through Jesse relating to running for President.).

31. I emailed Bo, the ACLU, Jesse, and people unrelated to this case, to inform them to please withdraw my previous request for a waiver of signature and fee requirements to run for President of the United States. (See, Exhibit 7)

32. On or about October 29, 2019, Jesse kindly replied to my email stating he "Just wanted to acknowledge receipt of your email. I will get back to you once I've had the chance to discuss this with the State Party Executive team" (See, Exhibit 8).

33. On or about October 29, 2019, Bo kindly took time to talk with me on the phone, as he has so often generously has done throughout the last few years. He kindly indicated the Party Chair must grant me a waiver.

34. I sent Bo the attached email to confirm my understanding that I must hold off until a determination is made by the Party Chair. (See, Exhibit 8).

35. I followed up on or about Nov 18, 2019, with an email to Jesse and the Party, and the Party Chair to check on the status of the Democratic Chair and Committee's decision. (Exhibit 9).

36. Jesse requested clarification. I provided clarification concerning my waiver in response to Jesse, the Party, and the Chair on or about November 22, 2019. (Exhibit 9).

37. On or about January 28, 2020, I sent an email to Jesse and the Party Chair, Bo, and unrelated parties requesting that they "Please provide a response!" (Exhibit 10)

38. I received an official response in the mail, dated February 3, 2020, from the Party through the Party Chair, stating:

> "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." (Exhibit 11)

39. On or about February 11, 2020, I sent the Delaware Department of Elections, via Bo, the Party's determination via email, and again sought a waiver of both the filing and or signature requirements from the Delaware Department of Elections,' in light of the fact such requirements violated my faith in Jesus Christ's teachings. (Exhibit 11, Exhibit 12).

40. On or about February 13, 2020, I followed up, and sent Emails to the Defendants, where I tried to explain, in another way, how collecting signatures violates my faith. (Exhibit 13).

41. On or about February 15, 2020, I completed the filing form, and signed it before a notary. (Exhibit 14).

42. On or about February 16, 2020, I sent the filing form via email to the Party, the Party Chair, Jesse, Bo, the Commissioner, via email. (Exhibit 14, Exhibit 15).

43. On or about February 17, 2010, I called the Commissioner to confirm receipt and to request a waiver of both signature and filing fee requirements so as not to violate my faith in Jesus Christ. The Commissioner denied my request for a waiver. (Exhibit 16, a follow up Email confirming the conversation where the Honorable Commissioner confirmed receipt).

44. I attempted to persuade them via emails, and calls, to help them understand how the filing requirements violate my faith. (Exhibit 17, includes a variety of emails).

45. I also attempted to show the Defendants how well suited I am for the Democratic House of Representative seat by sending them various emails reflecting some of my efforts in proposing changes in the federal law and on garnering support to

impeach on the 4 full separate articles of impeachment I drafted and a 5th one I started to draft. (See, Exhibit 18).

46. I am not ashamed of pleading with the Defendants to grant me a waiver. So, I do not have to disobey Jesus. (See, the Parable of the judge who lacked compassion. (See, Luke 18:1-8); (Also see, the funny parable of the man who kept bothering his neighbor in the middle of the night, until his neighbor gave him bread. Luke 11:5-13); (Also see, Luke 11:9, Matthew 21:22, Matthew 7:7 and James 4:3,).

47. On or about February 23, 2020, I sent a number of emails to the Defendants where I demanded the Delaware Department of Elections, and the County Department of Elections and the Commissioner register my filing form as filed, as of the date received or in the alternative before the filing deadline, without the condition precedent that I disobey Jesus Christ by conforming to the signature or filing fee requirements. (Exhibit 19).

48. I have not received a response to my demand.

49. I think the Department of Elections blocked my number. I attempted to call Bo, Kent County Department of Elections, Sussex County Department of Elections, and New Castle County Department of Elections. Unfortunately, it appears I have been blocked, as the "Your call cannot be completed at this time. Please try again later..."

50. Sadly, I failed to persuade the Defendants to register my form as filed.

51. So, I filed the Complaint in this matter, in an effort, *inter alias*, to secure the inclusion of Meghan Kelly's name as a democratic candidate for the United States House of Representatives seat for the State of Delaware for the upcoming election.

52. Pursuant to 15 Del.C. § 3101, "(1) Notification of candidacy shall be on or before 12:00 noon of the second Tuesday in July." (See, Exhibit 20).

53. That leaves very little time to respond to the pleadings.

54. That leaves very little time for me to provide notice to the public to gain their vote via non-compromising means such as newspaper articles, Facebook, and walk and talks.

55. I seek to run as a Democrat for the US House of Representative's seat in the state of Delaware.

56. I will likely face competition in the primary by Delaware's current democratic representative, in the U.S. House of Representatives, should this Honorable Court kindly grant me relief.

57. The Defendants refused to accept my filing form as registered, entered, filed and/or complete so as to assure me that I will be placed on the ballot for the upcoming election.

58. On or about October 28, 2019, I submitted the email, and attachments, including the letter to the Honorable Chair Erik Raser-Schram (hereinafter "Initial Waiver Request" or (IWR)," letter to the US Supreme Court, Court stamped Receipt, and ODC response from the Attorney Grievance Commission of Maryland relating to Justice Kavanaugh. (See, Exhibit 5, the Email and the attachments thereto including, Exhibit 5, A, the Letter and attachments to the Honorable Party Chair, Exhibit 5, B, (*excluding the attachments to the letters in Exhibits 5A and 5B and attaching the same as Exhibits 21-29 herein to conserve paper*), the US Supreme Court letter and attachments, Exhibit 5,

C, The US Supreme Court Response, Exhibit 5, D, the Attorney Grievance Commission of Maryland's determination relating to Justice Kavanaugh).

59. In the Initial Waiver Request, I noted "(A) caveat (relating to donations), I would be willing to accept donations from the democrat(ic) party as they cannot buy me or influence me since I am already a Democrat." (Id.).

60. I have since realized that donations from the democrat party also violate Jesus Christ's teachings and lead to corruption, as I communicated to Defendants. (See Exhibit 17, included communication along with other emails).

61. I attempted to explain how both filing fee and signature requirements violate my faith in Jesus Christ as I pleaded with the Defendants to grant a waiver, so as not to violate my freedom of speech, religion and right to run for office, by conditioning such rights on eliminating another Constitutionally protected right, as applied to me.

62. I should not have to be forced to sell my soul to Satan as a condition precedent, to run as a candidate in an election.

63. I should not be forced to disobey Jesus in order for an opportunity to gain an election seat.

64. The Defendants violate my freedom to worship or not according to the dictates of my conscience, not the dictates of the government's convenience, or the dictates of the convenience, profit and the power of a few who prefer to buy or barter candidates to serve their own personal agenda at the expense of the voters, the people they are charged to care for either by law, or by proclamation of the Party.

65. The Defendants violate my *freedom*, by such unconstitutional condition precedent as applied to me.

66. I define f*reedom* as *free will* to choose: to think or ignore, to care or harden your heart to, to love or not. I choose to think, care, love God, accessible through Jesus, God, the father, and the Holy Spirit, not by mere words alone, but by faithfully doing his will, even if I am the only one.

I. PLAINTIFF'S RELIGIOUS BELIEF

67. Meghan Kelly repeats and incorporates by reference all of the above paragraphs and all of the below paragraphs, and the Exhibits the paragraphs refer to therein as admissible under nonhearsay and hearsay exceptions, including but not necessarily limited to, probative fact, state of mind, belief, admission by party opponent, as though set forth herein in the first instance.

68. My personal religious beliefs are in issue. So, I am providing additional facts concerning these relevant issues

69. I am a Christian, and I find guidance in the Bible.

70. 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.

71. 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.

72. I believe living for self, and your own family, your own community and for those who affect, serve and benefit you, thereby living for self, without regard to others reflects the image of Satan. (Please see, Isaiah 14:13-14, Satan wanted to live for himself. He wanted to be his own God. Satan did not want to lay down his love for God, by in part loving others as himself, even outsiders, even the least of these. (Also see,

Ezekiel 16;49, People were damned to hell for their unconcern "they did not help the poor and needy."); (Also see Matthew 13:18-19 "the worries of this life, the deceitfulness of wealth and the desires for other things come and choke the word, making it unfruitful," meaning those people will be burnt up in hell.); (Further see, Luke 17:26-34 where Jesus also gave us examples of people merely caring for their own family and their own needs, working, buying and selling, eating and drinking, marrying and given into marriage before they were destroyed to be damned to hell for giving into tempting distractions of making money and making merry, and, or the anxieties of life while failing to understand the true purpose of life and eternal life, loving God and loving others as yourself, not exploiting others, outsiders to serve your greed); (Also see, Matthew 7:21 "Only those who do the will of God, go to heaven.); (Also see, Matthew 16:24, Luke 9:23, Matthew 10:38, and Mark 8:34, regarding true followers must stop doing what they desire to do, and do what God desires instead. Loving others even if it is painful.)

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

74. I believe people sin against God when they merely serve their own children and families, and those who serve or affect them, instead of all the people they are appointed to serve in their position of life.

75. 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...").

76. 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?").

77. 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.).

78. I believe leaders who serve themselves and those who serve them are not good leaders. They are misleaders and deceivers, not public servants. They mislead and deceive those they purport to serve, to instead exploit them, to serve themselves by placing self first. Servants of Self are Servants of Satan. They not only harm those they are charged to care for in this life, they also mislead and deceive others to become Servants of Self, Servants of Satan too, thereby leading many to hell too.

79. I believe President Trump's focus on putting self first misleads and deceives people to reflect the image of Satan by learning to love money and merriment, profit and pleasure more than other people.

80. Instead of loving one another, people wrongly learn to love money to the extent that they are willing to harm and destroy human life, and eternal life to serve their fleeting fancies for funding and temporary desires.

81. I believe President Trump's winning at all costs, even at the cost of cheating, violating greater laws, of justice, mercy and faithfulness (See Matthew 23:23), makes us all lose, modeling the reflection of the image of Satan called the "lawless one" by his disregard of laws that teach us to care about other people. (Citing, 2 Thessalonians 2:8, also see Psalm 101:3); (I define evil as absence of love because "God is love." 1 John 4:16, People without God in their hearts have an emptiness they attempt to fill with fleeting fancies, fleeting feelings, fleeting funding or other idols in place of God's love).

82. I believe some Republicans in office teach the image of Satan, the lawless one, as good by teaching everyone for themselves under the facade of responsibility, without love or concern for outsiders or those beyond their own, misleading those they serve to harm and hell. (Citing, 2 Thessalonians 2:8).

83. It makes me sad because I believe some Republicans in office violate the First Amendment and God's laws by using God's name for their own vanity, meaning their own purpose in place of God's purpose, to serve power and profit under the guise of God thereby misleading people to harm and hell.

84. Sadly, I believe people go to hell for their confusion. Satan, the lower case god of this world, confuses to kill eternally. Pull 2 Corinthians, Chapter 4 to confirm.

85. So, I seek to draft laws to alleviate confusion as to what is good and evil, to correct not to condemn, to prevent harm in this life and eternal life.

86. I also seek to be in a position to impeach President Trump since it is likely he will win by cheating, election hacks.

87. 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.

88. The Holy Spirit, via God, via my conscience, teaching me to care, to love, is leading me to do the same as the prophets, to correct the President by seeking a position that will allow me to impeach him, in hopes to heal not only the victims of the harm he causes, but to heal his ugly heart with God's truth in love, not deception. God loves other people too, even your enemy, people of other political affiliations, races, religions, and places of origin, even if they do not know God, even if they have not accepted God's love. President Trump sins against God and man by harming others to serve self. (Daniel 13:45 "God stirred up the Holy Spirit of a young boy named Daniel."); (See, Genesis 41:38, Exodus 31:3, Numbers 11:17, Numbers 11:25); See, Deuteronomy 34:9, "The holy spirit is also called the "spirit of Wisdom,"); (See, Judges 3:10 The Holy Spirit is also called the "**spirit of the Lord**" The holy spirit works the same in the Old testament too. It is the same God.); (Also see, Romans 8:14 "**those who are led by the Spirit of God are children of God**.,"(emphasis intended)); (Also see, Psalm 51:13, Wisdom 1:5, See the entire book of wisdom too, See, Matthew 1:18); (See, Matthew 12:32 "And whoever speaks a Word against the Son of Man will be forgiven; but **whoever speaks against the holy Spirit will not be forgiven, either in this age or**

in the age to come." (emphasis intended)); (See, Matthew 28:19 "Go therefore and make disciples of all nations, baptizing them in the name of the Father, and of the Son, and of the **Holy Spirit**."); (See, Mark 13:11, Mark 12:36, Mark 3:29, Matthew 3:11, John 14:26, John 16:13, John 14:17, Ephesians 1:13, 1 John 4:6); (And see, John Chapter 3, Regarding being born again, being born of flesh in human life and of **spirit** receiving eternal life the same as Moses and Daniel did in the Old Testament.).

89. In Ezekiel Chapter 34:1-10, God scolds leaders, shepherds 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. (Also see, Jeremiah 23:1, and Zechariah 11:17).

90. My religious beliefs prevent me from gathering money or signatures in adherence to the requirements under 15 Del.C. § 3103.

91. Even if I had the money to pay my religious beliefs prevent me from paying the filing fee.

92. Payment of the filing fee violates my freedom not to speak and freedom not to encourage conduct, payment and use of money that I believe leads myself and other people to harm and hell. I believe it is wrong.

93. I believe paying the filing fee is a sin against God.

94. I will not collect donations or signatures 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.

95. 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."). (Also See, See, Luke 19:45-48, Malachi 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.)

96. 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."

97. 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.

98. I was correct when I wrote to the Party Chair, "I do not believe the Democratic party 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." in the October 28 letter. (Exhibit 5, B).

99. By their failure to grant me a waiver, thereby persecuting based on my religion, this powerful group of a few, the Party, indicated they do not respect or support my freedom of religion.

100. With regards to two issues that the powerful few support since it supports their pockets, 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.

101. 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. (Also see, Ezekiel Chapter 9 Children can choose a way of life leading to hell too).

102. 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.

103. 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, or 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.

104. 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.

105. The other example is Judas Iscariot. In Matthew 27:1-10, Judas said sorry, confessed his sin, gave the 30 shekels 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.

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

107. 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.

108. I believe Jesus was not kidding when he said you who love mother and father more than me are not worthy of me. You who love son and daughter more than me are not worthy of me are not worthy of me. (Citing, Matthew 10:37).

109. 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. I believe our righteousness exceeds that of the scribes by our trust in God.

110. The Bible teaches, 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.

111. I believe this righteousness was attributed to Lot when he listened to God's word through messengers, the angels. He did not even turn around when his wife turned into a pile of salt. (See, Genesis 19:26).

112. In the Parable of the ten virgins in Matthew 25: 1-13 Jesus tells a story of ten virgins traveling to a marriage feast. All ten virgins had lamp oil. Five ran out, and asked those who had oil to give them some. Those with oil responded rightly by telling those without, no, go buy your own or we will not have enough ourselves. They did not even say sorry. Those who bought the lamp oil did not get back in time and were locked out of the marriage feast, meaning they went to hell.

113. I believe Jesus teaches us by this parable that: yes, we love others, and yes, we love ourselves, but we love God more, and live for God foremost not for self or others. Id.

114. Thus, we should obey the greatest command to love God by living for God and subordinately to love one another. Love does not encourage harm in this life and eternal life for mere material convenience. (See, Romans 13:10).

115. 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.

116. 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 the 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, Jeremiah Chapter 31, Nehemiah 7:5, Ezekiel 36:26 relating to God's law or God written in our heart.)

117. 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.

118. My beliefs are genuine.

119. I ran for local office and espoused the same beliefs on collecting donations and fundraising. (Please see Exhibits, 21, 22, 23, 24, 25).

120. 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, 26).

121. I twice rejected appointments to family law matters as violating my religious beliefs (See Exhibits 27, 28).

122. I confronted the Courts in Delaware per the attached letter concerning impartiality and bias. (See Exhibit 29); (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.").

123. 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 30). I believe it means using the name of God, or religion or scripture for man's purpose instead of a true religious purpose.

124. I believe it would be wrong to pay the filing fee and/or to collect signatures or donations from anyone even the Party or the Democratic groups, 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 money or benefits such as signatures. We are not supposed to buy or barter for via collecting signatures or pay for party or people's favor, loyalty or support for

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

125. Paying the filing fee and/or accepting signatures or donations from individuals or groups, even democratic groups, 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. The paying of the filing fee allows the Party to use the fee to buy the support of candidates or for candidates. That violates the bibles teachings on impartiality.

126. I believe it is wrong (a sin against God) for the Party to pay a team to support their interest or candidates.

127. I believe it is wrong (a sin against God) for the Party to donate to candidates, as it is likely to lead to buying of favors and influence in violation of my faith in God.

128. The filing fee is used to buy votes, by buying support. That is wrong. Votes should not be bought.

129. I believe it is wrong for candidates to teach people wrong by teaching the voters they earn support with money.

130. I seek 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.

131. I believe the vote is the only non-corrupt, impartial means to show support or lack thereof.

132. No one knows how anyone votes, accept them and their God unless they disclose it.

133. Thus, the right to vote, and to run for office without conditioning such right on eliminating another fundamental right, must be protected.

134. 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.

135. With the acceptance of the cloak of government authority, I understand my rights will be more limited in order to uphold the rights of those I hope to serve.

136. 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.

137. Americans should worship or not according to the dictates of their own conscience, not the dictates of the government.

138. I will treat everyone with respect regardless of religion, race, gender or place of origin. I am not scared to love outside of my own. I am commanded to.

139. Since, I do not wish to violate the Bible's teachings on impartiality, I respectfully, request Defendants filing fees and/or signature requirements be waived under 15 Del.C. § 3103.

III. POLITICAL PAST, A GLIMPSE OF CORRUPTION, BARTERING & BUYING CANDIDATES, SERVING POWER AND PROFIT INSTEAD OF PEOPLE

140. I am a registered democrat.

141. I previously ran for office in 2018 for the State House of Representatives Seat for the 38th District as a Democrat.

142. I paid the filing fee during that time, and accepted donations from Democrats during that time. (See Exhibit, 31).

143. Due to religious reasons, in 2018, I only accepted donations from the formal Democratic groups.

144. In 2018, people told me we would get our filing fees back because that was the custom.

145. In 2018, no one running in Sussex received their filing fee back per the County Democrats.

146. In an Email attached hereto as Exhibit 32, dated September 18, 2018, I responded to Jane Hovington's determination and or the Sussex County Democrat's determination that no Sussex County Candidates would receive their filing fee back:

> "Hi Dolce, Thank you for stepping up to help us. I am not accepting donations from anyone, but the Democratic party groups for religious

reasons. I am a Christian. I do not want to violate Matthew 6 and support the false praise of President Trump for his alleged charitable works.

People in Sussex support him, though his conduct is not praise worthy. He is misleading so many people I love.

We should lay a foundation for success not only for this election, but for future elections. I'm disappointed the Democratic Party for the state has not helped me either. I grew up in Sussex. I was raised here. The reason why so many do not support our party is because they do not believe we support them. My neighbors lament that the democrats only care about upper Delaware, not lower Delaware. We have more people running on the democratic ticket this year than other years. If Sussex Democrats are merely concerned with the federal and Presidential elections, that actually may confirm the false beliefs of my neighbors and hurt the democrats down the line.

Democrats care about everyone, we are the party of inclusion. We care about the North, upper Delaware, and the South, lower Delaware, and everything in between.

Please help me, help you bring the blue back. Please help the other candidates too.

Thank you,

Meg" (See, Exhibit 32)

147. The County Democrats indicated they would support the national and federal elections not the county seats. They would not return the filing fees back like they allegedly did in prior years.

148. In addition, the 38th District kindly helped me by a donation. (See, Exhibit 33).

149. Yet, the 38th District misstated the amount the group was allowed to contribute to be a lower amount than the $3,000.00, allowed limit per candidate.

150. I sent the 38th District members an email to correct the miscommunication of the amount candidates were allowed to receive was $3,000.00 from democratic groups not a lesser amount. (See Exhibit 34)

151. I believe the fact the County Democrats did not support local candidates and the misstated lower fee of campaign limits evidences both the County Democrats and the 38th District Democrats were compromised into serving those who serve them,

supporting those who support their pockets, or personal interests, not who will do what is right.

152. This is an example of why I believe the filing fees, and donations contribute to the corruption in politics, while also violating Jesus Christ's teachings. The fees and donations teach people to reflect the image of Satan, serving those who serve them thereby serving themselves, instead of seeking to do what is right, not self serving.

153. Please note, the emails relating to the 2018 examples, was before I became wiser. more educated and learned the corruption relating to paying filing fees was a wrong. It is a sin.

154. Sadly, I learned that Democrats try to buy different democrats too, thereby compromising their integrity and their eternal souls.

155. Thankfully, I believe there is no condemnation in Christ, so long as I turn away from the sin of paying the filing fee and accepting volunteers or checks from the Democratic Groups too, and turn towards God's will.

156. I have since 2018, realized that paying the filing fee would violate Jesus Christ's teachings, and be a sin against God.

157. I have since 2018, realized that accepting volunteers, and donations, even volunteering signatures from the Democratic organization or others violate Jesus Christ's teachings too.

158. During 2018, I told the members of the 38th Democrats I would not take donations or give donations from individuals.

159. Many participants in the 38th District appeared to be involved in other groups and entities that asked for donations. Yet, I would not buy votes by giving money

to those who purport to support me thereby sinning against God by supporting myself. Nor, would I accept money or volunteers from such group thereby allowing myself to be bought, or to become biased, or compromised by the desire to serve myself at the expense of those I hoped to be charged with serving.

160. I am priceless, not a price tag.

161. People are priceless not price tags, to be bought or bartered for with filing fees, donations, signatures, and such thereby compromising their integrity to do what is right instead of what is self serving.

162. Such groups have narrow interests, not necessarily focused on serving people outside of their own with additional and different interests, yet important too.

163. Thus, when members of groups, such as the Party, give donations to candidates, they compromise the candidates' ability to serve those they are charged to serve with the temptation to serve those who serve their seat instead.

164. I faced disdain and persecution related to my religious beliefs because of the unusual manner I campaigned back in 2018.

165. One of the head Democrats demeaned me in front of everyone at a meeting, Dr. Mohammad Akhter. (See, Exhibit 35, Also see Exhibit 38, regarding information relating to conflict with major campaign contributors to both parties, the healthcare industry, and the apparent agenda that Dr. Mohammad Akhter purported to support).

166. Even more insultingly, I discovered most of the people at the meetings did not read my campaign material or the few articles I drafted in the local paper, the Coastal Point

167. I believe some of the powerful democratic members only cared about what they could personally get out of me, and not anything beyond that, including how well I could serve. (Reflecting the image of Satan. (See, Isaiah 14:13-14.); (Cf, Matthew 23:11 "The greatest among you is your servant." Servants of self are not great. They mislead and deceive those they purport to serve to serve themselves instead. Good leaders teach those they serve to be great too, by teaching them to serve one another not exploit and harm one another to serve greed.).

168. In 2018, I was invited to a meeting by official members of a Democratic group, where I thought the Democrats of the 38th District were offering their support, financial and otherwise because they said they were going to help me out. Instead, to my horror, they asked me not to run for the 38th House District Seat after I expended my time, effort and own personal funds on material. (Exhibit 35).

169. The powerful few democrats who chose to be involved in party picking in the 38th District thought they could buy my seat by offering to return my filing fee, and offering an alternative to run for another office, such as the Recorder of Deeds, with a waiver of filing fees.

170. They were wrong to think I was running to gain power. I ran because I wanted to make a positive difference in the lives of those I had hoped to serve via drafting and amending laws to serve people and to protect them from exploitation by those who serve greed. Mere power is not what I seek,

171. I contacted Jane Hovington, a big whig in the Sussex Democratic Party, concerning her lack of support or knowledge of my legislative agenda. (Exhibit 36, concerning emails and the attachments thereto, relating to our communications).

172. To my horror, many of those within the party did not educate themselves about local candidates, including myself. It seemed like a mere job that some were paid to care about, and their concern did not go beyond their paid support.

173. At one instance at the Democratic headquarters, I tried to calm down a member (herein referred to as "the Member") of the Democrats after she called Robert Arlett ugly words.

174. I said we should adhere to Michelle Obama's saying "When they go low. We go high."

175. The Member responded by pointing her finger at the door of the headquarters for me to get out, while indicating she had more experience and I knew nothing because of my youth.

176. I left the Democratic headquarters.

177. I forget the Member's exact words, but I communicated with Jane Hovington ("Jane"), who observed this event concerning this event.

178. Instead of comforting me after such harsh remarks, Jane instead sympathized and thus encouraged the misbehavior based on the Member's fleeting feelings, instead of encouraging the Member to control her feelings (instead of allowing them to control her), and to respect others, including me, regardless of age and apparent experience in politics.

179. I forget what the exact words the Member said, but I followed up with the attached email to Jane Hovington in addition to contacting her by phone, from a number I no longer have.

180. I sent Jane the scripture regarding let no one demean you because of your youth, with a picture of the attendees at the meeting where the event occurred. The lady sitting next to me, wearing the Carper shirt, was the lady who forced me to leave. I do not know her name, but it is notable I saw her picture is on a sign on Route 26 near Hockers, advertising the health industry. This is the industry I desire to draft laws to prevent the massive killing and bad care I have learned about throughout history, and via recent history, by inter alias its contribution to the addiction crisis and the alleged molestation of babies by Dr. Bradley in Delaware. (Exhibit 37).

181. Jane openly professes her faith in Christianity. So, I did not fear offending her by citing the Bible.

182. I also sent the attached emails to Jane concerning her, and thus the Democrats, lack of support for my campaign. (Exhibit 36).

183. On the day of the election, I visited all of the voting stations in the 38th District in lower Delaware.

184. To my horror, most of the voting stations only handed out the attached anti corruption handout, not the handout with my platform. So, the stations did not allow voters to read about the good I hoped to do. Instead, they merely were able to read my anticorruption hand outs that cited the Bible and the fact I would not participate in fundraising events due to my belief in Jesus Christ's teachings. So, it made me look unusual and possibly weird or offensive to those who do not believe the same on the most important day, election day. (See, Exhibits 21 and 22).

185 In fact my anticorruption handout did upset someone early on.

186. Prior to the election in 2018, I received free training in Dover where someone looked at my material and scolded me. She was offended by my quote from Jesus Christ on the anticorruption brochure relating to the fact I was not going to attend fundraising events. She said she was going to support me, but was no longer supporting me because of the quote. She was so angry at me. (See, Exhibit 21).

187. Sadly, I amended my brochures to change the word temple into "places of worship" or something similar, since she was Jewish. I did not desire to offend her. I merely desired to obey Jesus Christ by not participating in fundraising.

188. The anticorruption handout originally included, in part:

> "I was thinking about doing fundraising at restaurants, but 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 the 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 **temple**; they love to be greeted with the respect in the marketplaces..." Matthew 23:5-7. "(emphasis intended).

189. I changed the handout to replace "temple" with"[places of worship]" in a revised handout providing, in part:

> "I was thinking about doing fundraising at restaurants, but 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 the 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 the respect in the marketplaces..." Matthew 23:5-7. " (See Exhibit 21, emphasis intended).

190. I felt sad for changing Jesus Christ's words based on the discomfort it caused others, and one lady specifically.

191. On election day in 2018, as I visited each of the voting stations in the 38th District in Delaware, I also saw the boards I created for each of the stations were knocked

down. So, people could not read the newspaper articles or brochures I placed on the boards.

192. I lost the election in 2018. I had little support from the Democrats. Though some offered to hand out papers for one day, but required my mother and I to perform their job of handing out all the Democrats papers to certain listed locations. So, they used me for their personal agenda instead of supporting me, which reflects the corruption in politics. (See Exhibit 44, a picture of one of the people offering to hand out my material with my mother, only in exchange that I hand out other Democrats stuff, thereby reflecting the corruption in politics (while violating the Bible's teachings), by doing what is self serving, not what is right.)

193. Jesus, in Matthew 6 teaches “Do not give your (charitable) alms seen. Do not be like the hypocrites." When you give charitable love "do not know your left hand from your right hand," meaning do not give out of one hand to get out of the other. Giving to get something in return, such as asking folks to volunteer signatures or donations or to door knock, in exchange for something, such as supporting their personal desires instead of what is best for the people, not only compromising the integrity of the candidates running for office, it also misleads and deceives people to harm and hell, under the guise of good.

194. Jesus teaches do not charity give seen period. I believe people are damned to hell because of the deception volunteering, including volunteering signatures, volunteering donations, fundraisers, girl scout cookie sales, car washes, alleged charitable races, school pizza drives, donations to organized groups or organized charities, go fund me pages and the like wrongly teaches people.

195. It is no small sin. Teaching giving to get, is unconditional charitable love, wrongly drives out the love from the hearts of man, the God from the hearts of man because "God is Love", and replaces it with the love of money, or the desire to serve self, instead of unconditionally loving and respecting others, without requiring they earn it.

196. This evil done under the guise of charitable good teaches people wrong. The Bible teaches people go to hell because they learn wrong, and do not unlearn deception as truth. People go to hell because of their hard-hearted ignorance, misunderstanding, and for not knowing truth. Not knowing is not innocence. It is evidence of guilt, not caring to know, caring to love. Even children may be damned to hell on judgment day. To confirm, pull Ezekiel Chapter 9. (See, Isaiah 44:18 regarding "stupidity and ignorance" that damns); (Also see, Ephesians 4:18, Romans 1:21); Also see, Matthew 13 the Parable of the Sower, only those who understood were fruitful, not to be burnt up, meaning damned to hell for eternity); (See Isaiah 9:16, "For the leaders of the people mislead them, and those they guided are led astray.").

197. People wrongly learn giving money seen, or volunteering seen, or volunteering signatures is good, and somehow contributes to good, even though I believe it contributes to corruption, and thus contributes to evil. People praise those who volunteer signatures, volunteer time, and donations as good, as making a difference.

198. Meanwhile, I think giving charity or volunteering signatures or otherwise seen or conditionally is evil. I believe the vote is the only noncorrupt, uncompromised form of voicing support.

199. Poor people may not have the resources to volunteer such as vehicles or gas money. Poor people may not have the money to donate. So, people who are misled

into thinking giving seen is good wrongly learn to think poor people cannot be good because they do not contribute or give seen.

200. The next thing you know, people are condemning the poor they hypocritically profess to be helping by charity, by evil thoughts and words, calling them names or thinking they are bad, lazy deadbeats and the like.

201. By giving charity seen, I believe people sin against God and man and mislead people to harm and hell by teaching the world business is charitable love.

202. There is no sin in mere business.

203. The sin includes misleading, wrongly teaching people by example, by the example Defendants require I adhere to under 15 Del.C. § 3103, that business is love and thereby replacing the unconditional love in the hearts of men with the love of money or the desire to be served instead of to serve.

204. Since, Jesus teaches you cannot serve God and money, I believe such deception misleads people to hell. It is not okay.

205. Paying the filing fee would be a sin against God by such bad example.

206. I believe the filing fee money will be used in activity I believe misleads and deceives others to hell. I do not want to encourage conduct that communicates something evil is ok thereby harming those I seek to serve.

207. The freedom of speech, includes my freedom not to speak by communicating what I believe is a satanic, eternal life-threatening message by paying the filing fee or asking people to volunteer donations or signatures only to compromise their eternal souls.

208. I believe the filing fee may also be used to pay people, prostituting them to support whoever they are paid to support, by door knocking, calling people, and other tasks, all I see as paid corruption, in violation of my religious beliefs. (Reflecting the image of Satan under the guise of good.). Far worse, the money may be used to help pay for other candidates' materials and campaigns, in a sense, buying the candidates loyalty to serve those who support or fund the candidates' campaigns instead of serving those they are charged to serve. Teaching the candidates to I believe reflect the image of the devil misleading them to hell should they not repent.

209. I contacted all 541 members of the Federal Congress by various diverse means in an attempt to garner support for impeachment. (Exhibit 40).

210. I personally drafted 4 drafts of articles of impeachment to impeach President Trump on. (See Exhibit 18).

211. I started a 5th Article of impeachment. (See Exhibit 18).

212. I sent the articles to most of the House Judiciary Committee. (See Exhibit 40, This Exhibit includes additional Emails to the Judiciary Committee).

213. I also emailed, and mailed them out to a few other members, including but not limited to Representative Rochester, Senator Coons, and Senator Carper.

214. I hand delivered copies of the articles to Representative Rochester's office in Sussex County as well.

215. I even faxed various members of congress the articles too.

216. I spent hours calling members of congress about impeachment.

217. I also called members of congress to confirm whether they received a post cards I sent to all 541 members.

218. Many of the staffers had no idea what I was talking about.

219. Both Senator Coons and Representative Lisa Rochester responded to my communications indicating it was not the appropriate time to impeach. (See, Exhibit 41).

220. I learned the leaders, or shall I say those I believe to be misleaders in congress, wasted people's time, which is more precious than gold, by encouraging people to merely feel like they were contributing or making a difference by investing hard work, and effort to contact those in office.

221. I discovered many congressmen and congresswomen focused on looking good, making people feel good without actually doing good, which I believe is no good.

222. So, I will not waste people's time by encouraging people to contact me when I know I will be working hard. So, I will not have time to read their hard work, should I hold a public seat.

223. I contacted President Obama more than once and received boilerplate responses. If you look at the attached Exhibit 42, you will see the same letter sent to me twice. In one letter President Obama called my Linda by mistake. So, I think they send letters out without actually reading what voters send in. I hope others do not waste time contacting representatives like I did. (See, Exhibit 42).

224. I believe many leaders in congress teach people to praise evil as good, by praising what serves their seat by serving those who donate and volunteer for them, instead of what is right. That is wrong. I do not want to be like them. I choose to be who I am, "not conformed to the world, but transformed by the renewing of my mind." (Citing Romans 12:2).

225. I remember reading about someone in the paper who was involved in the chicken business, who donated 1.8 million to cancer center, when he **may** have caused the pollution creating the cancer by his involvement in certain tasks in the chicken industry, thereby profiting two wrong doers, overcharging health care providers who at times conceal and kill, instead of heal, and people who profit off of the life threatening pollution they cause by such marketing, bought good will, and trading and or buying favors or bartering for political loyalty. (emphasis intended).

226. I believe such charity as the donation to a cancer center I read about in the paper, violates Matthew 6 and misleads people to harm and hell.

227. Throughout American history, I believe politicians and charities such as the Rockefellers have served Satan and have caused harm and eternal damnation to many under the guise of good.

228. I keep myself separate. Scripture says "Be holy because (God) is holy. Jesus says be perfect like your heavenly father is perfect. That means do not sin just because everyone else does. Evil is still evil, even when the masses are misled into believing evil is good. (See, Leviticus 20:26, Leviticus 11:44, Leviticus 19:2, Leviticus 21:8, 1 Peter 1:16, relating to be Holy because I (God) am Holy, See, Matthew 5:48 Jesus commands "Be perfect, therefore, as your heavenly father is perfect." Also see, 2 Corinthians 6:17 "separate yourself from them" meaning do not sin like they do.).

229. I think some Delaware democrats and republicans in office may be bought with donations or support by those who profit off of wrong doing, poisons or poisoning, like hospitals who profit off of sick people, polluting chicken plants, polluting farms, polluting factories and Artesian who profit off of dirty water, while committing Matthew

6 violations, creating conduct that I believe not only harms people, but damns them to hell.

230. I believe it is satanic when people only will help you if you compromise your soul, instead of doing what is right, because it is right, or when they only seek what is self serving and sell whatever that is to the masses under the facade of right.

231. I am repulsed when leaders sometimes plead ignorance when foreseeable harm results. Yet, ignorance is not innocence. Leaders often ignore the foreseeable harm. They choose not to care, or far worse pretend not to know when they do because they exploit economic, social and political strains for their own gain instead of alleviating strains to care for the people they are charged to serve.

232. I do not believe the same way as others. I do not think the same way. I should not be persecuted for my diverse religious beliefs.

233. I experienced persecution from people from Republicans too, including my opponent Ron Gray during the burying of the hatchet parade per the attached email. Representative Ron Gray and his three companions were so mean to me that I started to get teary eyed. I jumped out of the very slow-moving convertible during the parade. Honorable Senator Coons Secret Services men, Officer Hughes, and Senator Steve Smyk kindly rescued me that sad day. (Exhibit 43).

234. I sent Jane an Email concerning the above referenced mistreatment during the 2018 parade. I sent her pictures of Ron Gray and I smiling before I entered the vehicle and it became ugly, pictures of Steve Smyk without me, a picture of me in Ron Gray's vehicle, and a picture of me in Steve Smyk's vehicle. (Exhibit 43).

235. Even though I am a democrat, Senator Smyk showed me great kindness and showed the world true leadership by loving those outside of his own, as did the heroic Officer Hughes who is respectful to all people, and Senator Coons' secret service men, including Shawn.

236. Doing the right thing takes courage because many people often want what is self serving immediately, not what is right.

237. I believe we are commanded to be the light of the world because we know God. Others do not know God. So, we are to shed light on other people's feet to prevent harm here and damnation into eternity. God loves other people too.

238. I believe the entire command summed up is to love God and love one another. Yet I think people confuse praising sin, flattery, encouraging fleeting feelings or fancies or providing false assurance or saying "do what you want," instead of saying do what is right, as love. Hurting yourself or others is not good because God loves you and loves others too even non-Christians. So, it is a sin against God. See, Matthew 22:36-40, Also see, John 13:34, John 15:17.

239. Yet people want to do what they want to do, without love for God, others or at times even themselves, thus reflecting the "lawless one" Satan, leading to harm and hell. (Citing, 2 Thessalonians 2:8).

240. Scripture teaches me to "Have nothing to do with the fruitless deeds of darkness, but rather expose them. It is shameful even to mention what the disobedient do in secret. But everything exposed to light becomes visible and everything illuminated becomes clean." Citing Ephesians 5. I believe this means that the darkness is transformed into light, saving by transformation the wrongdoers into right-doers thereby saving their

souls by such painful correction. I believe we are called to guide those in darkness to love people, not material things, money or merriment to the extent they hurt precious people God loves to gain the world.

241. I am not willing to exchange my soul to gain the world or a place on the ballot by teaching darkness is light by collecting donations or signatures or paying the filing fees, and that light is darkness by choosing not to love God enough not to make my personal case for Jesus Christ. (See, Matthew 16:26. Jesus says "For what profit is it to a man if he gains the whole world, and loses his soul? Or what will a man give in exchange for his soul?"), (Also 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.")

242. I believe leaders should care about other people more than serving their seats or winning an election. (Matthew 23:11).

243. When leaders care about winning and serving themselves more than the people they purport to serve, they mislead those they serve to reflect this same image, the image of Satan too, misleading them to harm and hell.

IV. PLAINTIFF'S FUTURE INTENT

244. I also intend to run as a Democrat in future races, beyond 2020.

245. I have a desire to run for office in order to draft just laws to serve God.

246. Jesus Christ indicated "justice, mercy and faithfulness" are greater, more important, commands than rules relating to mere material things or money. (Matthew 23:23).

247. Throughout scripture in the Bible and by the grace of God through the Holy Spirit, I learned the difference between unjust decrees and just laws.

248. Unjust laws teach people to love money, profit and pleasure to the extent people are willing to harm, and exploit others to serve greed. 249. This not only causes economic harm, and potential harm to human life and health, it also causes eternal harm. " You cannot serve money and God." (Luke 19:45). Those who serve greed go to hell.

250. Unjust leaders teach people to focus on money and merriment, fleeting feelings, fleeting fancies and fleeting funding. They teach people to reflect the image of Satan by living for self and for those who affect them, thereby living for self like Satan, without reflecting love, (the image of God because "God is Love"), to others outside of their own or God (because God loves other people too). Per Isaiah 14-13-14, Satan wanted to be his own God.

251. I believe people who live for self and their own families and their own people without love for others or God because God loves others too are sadly children of the devil, not yet adopted by the God that loves them and seeks to save these confused kids from the misbehaving dad, the devil, who seeks to harm them, others and damn them to hell. (See Matthew 13:38 regarding "children of the evil one"); (See, John 8:44 and 1John 3:10 Regarding "children of the devil"); (See, Ephesians 2:2 regarding "obeying the devil"); See, Romans 8:15 and 8:23, Ephesians 1:5, Galatians 4:5, relating to adoption from the bad dad that damns).

252. Unjust leaders teach people to reflect the image of Satan, called the "lawless one" by wrongly teaching everyone is for themselves, their own, without laws teaching people to care about (love) others. (Citing, 2 Thessalonians 2:8).

253. Just laws teach people to care about one another by correcting folks in court when they harm others to serve greed.

254. Laws are a tool judges and lawyers may use for good or evil, for justice or injustice, for love of humanity or for the love of money, a.k.a. greed.

255. I think of judges like Judge Clark, of the Court of Common Pleas, as super heroes, eternal life savers, because he corrects people and never condemns them. Like a loving father I heard him scold a defendant saying " I know you can make better choices. I am disappointed. You know better." Judge Clark encourages faith, not despair, hope, not discouragement, building up with correction, not tearing down with condemnation. He saves lives and eternal lives and reflects what I think a super hero is.

256. I hope to draft laws to correct wrong doers in hopes to transform them into right doers, and to also heal victims of the wrongdoers misdeeds.

257. I desired to run for office back in 2018, because no legislator would fix the problems I presented to them, with the solutions I presented.

258. I was not able to unharden the legislators' hearts to get them to care outside of themselves.

259. Specifically, I discovered misbehavior relating to out of state title companies who practiced law without a license, costing Delaware a lot of untaxed revenue and allegedly causing mistakes in the chain of title in real estate transfers, per other lawyers too.

260. I contacted various legislators for help on this issue.

261. Only one law maker seemed to be interested in helping me.

262. Sadly, he seemed to be interested in me personally. When I said no thank you regarding a personal relationship, he stopped helping me. (See Exhibit 45).

263 I made it clear my request for legislative help was only a professional interest for a specific purpose, not a personal relationship.

264. I drafted an Article in the Coastal Point shedding light on this problem and offering a solution in the July 6, 2018 issue of the Coastal Point, called *Candidate discusses title companies' issues* . (See, Exhibit 46).

265. To date, no one has fixed the misbehavior relating to the out of state title companies practicing law without a license, thereby costing Delaware additional revenue that could be used to help the schools instead of increasing taxes and thereby forcing more Delawareans into foreclosure.

266. On an aside, I also contacted every single School District in this state and the General Assembly with a proposal to save the schools without increasing taxes. (See, Exhibit 47).

267. Only Senator Steve Smyk kindly responded with support for my proposal to save the schools. I was so touched by his compassion for the schools, especially since he is a Republican, and I am a Democrat. Note, this was before the parade where this Senator allowed me to ride in his vehicle instead of Representative Ron Gray's.

268. My belief in serving God by seeking justice, seeking what is right, unconditionally, even if it does not help me, admittedly makes me different from other politicians. I am not easily manipulated by money, power or fear.

269. I have a fire in my belly to drive out darkness with light, injustice with justice, hate with love, ignorance with truth, and death with life.

270. That fire will not die should someone else gain the seat in 2020.

271. So, I seek a waiver from the Defendants in future elections as applied to me too.

272. I have never met anyone else who believes the same as I. So, I doubt anyone else will reject, money, volunteers, or signatures. Thus, I am seeking a waiver from Defendants, for a future election, limited to me, as a class of one, under the Equal Protections Clause, as well.

COUNT I DEFENDANTS VIOLATE THE EQUAL PROTECTIONS CLAUSE AS APPLIED TO MEGHAN KELLY'S
FREEDOM OF RELIGION

273. Meghan Kelly repeats and incorporates by reference all the above paragraphs and all the below paragraphs, as though set forth herein in the first instance.

274. The Fourteenth Amendment prohibits states from depriving any person of life, liberty, or property without due process and **equal protections of the law**. (emphasis intended).

275. Any state law that conflicts with the Constitution under the equal protections clause, as applied, is preempted, unenforceable and unlawful to so apply.

276. Defendants deprive me of **equal protections of the law** by the unconstitutional condition precedent as applied to me, in this class of one, by requiring that I condition my right to the free exercise of my religion or the surrender of my right to seek office. (emphasis intended).

277. The application of the filing fee and or signature requirements clearly under15 Del.C. § 3103, violate my unique religious beliefs in this class of one.

278. The Defendants refuse to remove, waive, or exempt me from the requirements under 15 Del.C. § 3103 that conflict with my religion, thereby essentially punishing me for my belief in Jesus Christ by denying the benefit of the ability to run for office without violating my religion.

279. Defendants unlawfully discriminate against me by persecuting me based on my religious beliefs in Jesus Christ by requiring I disobey Jesus Christ to qualify to run for office as a Democrat in the US House of Representatives in the upcoming election.

280. Defendants unconscionably require I sell my soul to Satan by disobeying Jesus for the opportunity to gain a seat in the US House of Representatives by mandating adherence to 15 Del.C. § 3103.

281. I communicated my religious beliefs to Defendants.

282. Yet they refuse to comply with the equal protections clause by their stiff necked enforcement of 15 Del.C. § 3103, as applied to me.

283. My life, liberty and pursuit of happiness is protected under the constitution.

284. Life, liberty and pursuit of happiness are more precious than money and is afforded greater protection under our Constitution than mere money.

285. The Liberty interest to worship or not is according to the dictates of my own conscience, not the dictates of Defendants' convenience, profit and power or the dictates of the Party's convenience, profit and power, as they exercise activities that are so

traditionally the exclusive prerogative of the state that they constitute state action even undertaken by a private individual or individual. Running an election for public office has been found to be such an exclusive public function. (See, Terry v Adams, 345 US 461, County political group whose candidate almost runs unopposed in primary and general election cannot discriminate.).

286. Defendants require I adhere to the dictates of their convenience, profit and power, rather than uphold my fundamental rights from Defendants' abuse and persecution of me based on my different religious belief by essentially preventing me from the ability to run for office because of my belief in Jesus Christ.

287. The Constitution limits Defendants' conduct and application of laws, to prevent such abuse. It does not give them a license to abuse or persecute.

288. The First Amendment provides "Congress shall make no law respecting an establishment of religion, or **prohibiting the free exercise thereof**." (emphasis intended).

288. Defendants are punishing me, on the basis of my religious beliefs by denying benefits to, and, or imposing burdens upon me in order to be placed on the Democratic ballot in the state of Delaware, in violation of the free exercise clause, as applied to me, in this class of one.

289. Defendants violate my First Amendment right to the free exercise of my religion, applicable to Defendants by the Fourteenth Amendment, in that Defendants condition my right to the free exercise of my religion or the surrender of her right to seek office, by unlawful application of 15 Del.C. § 3103.

290. Defendants unlawfully discriminate against me based on my religious beliefs in Jesus Christ by requiring I disobey Jesus Christ to qualify to run for office as a Democrat in the US House of Representatives in the upcoming election.

COUNT II DEFENDANTS VIOLATE THE EQUAL PROTECTIONS CLAUSE AS APPLIED TO MEGHAN KELLY'S FREEDOM OF SPEECH

291. Meghan Kelly repeats and incorporates by reference all the above paragraphs and all of the below paragraphs, as though set forth herein in the first instance.

292. Defendants' forced payment of filing fee and/or signature collection requirement(s) pursuant to 15 Del.C. § 3103, is requiring forced speech repugnant to my belief in Jesus Christ.

293. Such forced speech requires I disobey Jesus.

294. Freedom of speech includes freedom not to speak. (See, West Virginia State Board of Education v Barnette, 319 U.S. 624 (1943), The government cannot require people to salute the flag or display other measures with which they disagree.); (Also see, Wooley v Maynard, 430 US 705 (1977), A motorist could not be punished for blocking a portion of his license plate that conflicted with his beliefs.); (Also see, Tinker v Des Moines Independent Community School District, 393 U.S. 503 (1969), This extends to symbolic acts such as wearing arm bands to protest the war. Students could not be forced to remove their bracelets to essentially feign support for something they opposed.).

295. The Defendants by requiring I compromise Jesus Christ's teachings, in order to adhere to a mere regulatory measure, 15 Del.C. § 3103, thereby require I

communicate a message I believe leads those I hope to serve to harm and hell, or relinquish my right to run for office, violate my freedom of speech.

296. The Filing fee is not benefiting me and I believe it harms those I hope to serve. (Distinguish from cases where the government may require a fee for a program that benefits the person such as Board of Regents University of Wisconsin v Southworth, 529 U.S. 217 (2000).).

297. The Defendant requires I pay a fee for the purpose of the fee, in part, to subsidize speech that I finds offensive, in violation of my freedom of speech applicable to the Defendants under the First and Fourteenth Amendments.

298. None of the filing fee, Defendants require to be paid to the Party, benefits me personally.

299. In fact, I believe the filing fee will be used by Defendants to fund speech to harm me and others by misleading those I seek to serve to harm and hell by buying candidates to serve the few personal desires of a few powerful members Democrats, the Party. I believe that any and all such spending teaches people to violate Jesus Christ's teachings under the facade of good.

300. Defendants deprive me of **equal protections of the law** by an unconstitutional condition precedent as applied to me, in this class of one, which requires that I condition my right to the free speech or the surrender of my right to seek office.

COUNT III DEFENDANTS VIOLATE THE EQUAL PROTECTIONS CLAUSE AS APPLIED TO MEGHAN KELLY'S
FREEDOM OF ASSOCIATION

301. Meghan Kelly repeats and incorporates by reference all the above paragraphs, and all of the below paragraphs, as though set forth herein in the first instance.

302. Defendants violate my First Amendment right to the free exercise of my affiliation, and/or right to run for office made applicable to the states by the Fourteenth Amendment, in that Defendants condition my right to the free exercise of her religion or the surrender of her right to seek office with the blessing of the Party and Party Chair, by unlawful application of 15 Del.C. § 3103

303. I am a Democrat, in part, because they support and safeguard for laws that teach respect for all people regardless of religion, gender, age, race, origin or place of origin.

304. The Defendants, the Party and the Party Chair violate what the Democrats stand for by their refusal to grant me a waiver, exempting me from the filing fee and or signature requirements, under 15 Del.C. § 3103, although the Party and Party Chair are empowered to do so, and in this case required to so as not to violate my belief in Jesus Christ under the equal protections clause.

305. The Defendants have no compelling interests in requiring the signature requirement or filing fee be paid under the statute, other than their corrupt use of the money to serve their own power and profit.

306. The Democratic party is the party of inclusion and diversity, where the members respect the diverse views of others.

307. The Party and the Party Chair's determination does not reflect the beliefs of all Democrats, including my own.

308. I should not be forced to conform my speech to the dictates of a few, the Party, and the Party Chair, to associate as a Democrat, in order to be placed on the ballot, by supporting speech I find offensive.

309. Defendants deprive me of equal protections of the law by an unconstitutional condition precedent as applied to me, in this class of one, which requires that I condition my right to the freedom to associate as a democrat by complying with the Party's and the Party Chairs requirements under 15 Del.C. § 3103, or the surrender of my right to seek office.

310. In addition to or in the alternative of, Defendants deprive me of the equal protections of law, in that Defendants by enforcement of 15 Del.C. § 3103, conditioned my right to seek office to conform to the bartered, bought, biased profit and power of the few powerful Democrats in the Party, instead of respecting the diversity of those within the Democratic party, by in this case, respecting my diverse beliefs as a loyal lifelong Democrat, to the party, not the few people in power in this party or their ever changing positions.

COUNT IV DEFENDANTS VIOLATE THE EQUAL PROTECTIONS CLAUSE AS APPLIED TO MEGHAN KELLY'S
FREEDOM TO RUN FOR OFFICE

310. Meghan Kelly repeats and incorporates by reference all the above paragraphs and all of the below paragraphs, as though set forth herein in the first instance.

311. By refusing to place Meghan Kelly on the Democratic ballot for the US House of Representatives, without conditioning such right by eliminating one of her other fundamental rights, the citizens will be denied a choice. That injury is irreparable.

312. While, the Supreme Court has found that the interest of running an efficient election supports a requirement that candidates obtain a reasonable number of signatures to get on the ballot, that does not take into account the fact gathering signatures violates my personal belief in Jesus Christ, so as to violate my freedom of religion under the First and 14th Amendments, as applied to me. Norman v Reed, 502 US 279 (1992).

313. The vote is the only non-corrupt form to show support for candidates running for office, and must be protected in general, and specifically in this case from the corruption relating to bartering for signatures or buying of support to gain the mere opportunity to serve the public in office.

314. Defendants violate my First Amendment rights, applicable to Defendants, by the Fourteenth Amendment, in that Defendants condition my right to right to seek office, on the surrender of my free exercise of my religion, speech, and or affiliation., with no least restrictive alternatives as applied to me.

315. Meghan Kelly, a person, a class of a person of one, of a different unique religious belief should not be forced to choose between the exercise of my Constitutionally protected rights or the relinquishment of the right to run for office without violating such fundamental rights protected under the Constitution.

316. The right to vote, and to run for office without conditioning such right on eliminating another fundamental right, must be protected, against Defendants unlawful application as applied to me.

317. The Defendants and the state have less of an interest in governing party activities than in governing elections in general. See, Eu v San Francisco County Democratic Committee, 489 US 214 (1989).

318. The Defendants do not have a compelling reason to enforce 15 Del.C. § 3103, against me, in this class of one, so as to violate my freedom of religion, association, religion, and related rights.

319. The Defendants do not leave alternative choices less burdensome to my freedom religion, association, religion, and related rights.

320. Defendants enforcement of 15 Del.C. § 3103 against Meghan Kelly is not necessary for an important or compelling interest.

PRAYER FOR RELIEF

WHEREFORE, Meghan Kelly respectfully requests that this Honorable Court:

1. Enter an Order of to exempt Plaintiff of future ballot requirements under 15 Del.C. § 3103, so as not to violate Plaintiff's religious beliefs;

2. Enter an Order requiring Defendants to place Meghan Kelly's name on the Democratic Ballot for the U.S. House of Representatives for the upcoming 2020 primary for the State of Delaware, and if applicable, the general election;

3. Enter an Order requiring Defendants shall, at their earliest convenience add Meghan Kelly to the absentee ballots for the U.S. House of Representatives for the State of Delaware, and, if applicable, shall mail such revised absentee ballots to all persons previously provided absentee ballots, is granted in this matter.

4. Enter an Order awarding Plaintiff costs, to the extent authorized by law or Court rule, and other such relief as the Court deems proper and just, if applicable.

Dated: _____

Exhibit N

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

The Clerk's Office
The United States Supreme Court
1 First Street, NE
Washington, DC 20543

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

April 3, 2019

Dear Honorable Supreme Court Justice Samuel Anthony Alito Jr.:

I am considering running for the President of the United States. Unfortunately, in order to successfully run, I would have to violate my religious beliefs. Thus, per both Karen's and with Madeline's kind encouragement from this Honorable Court's Clerk's Office, I am writing to respectfully seek a writ of mandamus waiving each state's signature and fee requirements to allow me to be on each state's ballot without violating my religious beliefs.

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, all the American people.

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

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 can not serve God and money.”). 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 by 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. [1]

[1] 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 humself. 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, Judhas said sorry, confessed his sin, gave the 30 sheckles 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, everbody 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 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 rightousness 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. 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

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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 affect.

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 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.

Thank you for your time and consideration.

Very truly,

/s/Meghan M. Kelly
Meghan Kelly, Esquire

DE Bar Number 4968

Exhibit O

A-4

IN THE SUPREME COURT OF THE STATE OF DELAWARE

Meghan Kelly, Plaintiff Below, Appellant, v. Donald Trump, a.k.a. Donald J. Trump, a.k.a. President Trump a.k.a. President Donald Trump, in his official capacity as President of the United States Defendant Below, Appellant,	)	No. 119, 2021

APPELLANT'S MOTION FOR THE DELAWARE SUPREME COURT TO REIN IN ITS ARMS THROUGH ITS AGENTS FROM UNLAWFULLY PRESSURING APPELLANT TO FORGO OR IMPEDE HER CASE TO PROTECT HER FREE EXERCISE OF RELIGION. BY RELIEF IT DEEMS JUST

1. I, Meghan Kelly, pro se appellant, having been granted in forma pauperis relief, move this honorable Delaware Supreme Court, unopposed, to reign in its arms through its agents unlawfully pressuring appellant to forgo or impede her case to protect her free exercise of religion, by relief it deems just. I suggest private guidance.

2. My faith in God may appear crazy to others. Nevertheless, I have the freedom to believe by the dictates of my conscience, no matter what the

government through its agents believes. *Cantwell v. State of Connecticut*, 310 U.S. 296, 60 S. Ct. 900, 84 L. Ed. 1213 (1940). I am allowed to think differently instead of being conditioned to worship as the state's forced will of materialism, pursuit of money, and unholy charity that damns people to hell per Jesus, such as fundraising or organized charity. Jesus teaches people "have their reward," meaning they have no reward, no eternal life from God. Matthew 6:1. Organized charity, fundraising, pro bono, and volunteering is no small sin. It is not true charity, but damns people to hell by teaching business greed is love. *See Matthew* 6:1-5. Also *see*, *State ex rel. Tate v. Cubbage*, 210 A.2d 555, 557, 1965 Del. Super. LEXIS 67, *1, 58 Del. 430, 433, ("It is no business of courts to say that what is a religious practice or activity for one group is not religion under the protection of the First Amendment. Nor is it in the competence of courts under our constitutional scheme to approve, disapprove, classify, regulate, or in any manner control sermons delivered at religious meetings."); *See, Africa v. Pennsylvania*, 662 F.2d 1025, 1025, 1981 U.S. App. LEXIS 16448, *1, (3d Cir.), *cert. denied*, 456 U.S. 908, 72 L. Ed. 2d 165, 102 S. Ct. 1756 ("It is inappropriate for a reviewing court to attempt to assess the truth or falsity of an announced article of faith. Judges are not oracles of theological verity, and the founders did not intend for them to be declarants of religious orthodoxy. However, while the truth of a belief is not open to question, there remains the significant question whether it is

truly held. Without some sort of required showing of sincerity on the part of the individual or organization seeking judicial protection of its beliefs, the U.S. Const. amend. I would become a limitless excuse for avoiding all unwanted legal obligations."); *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 682, 134 S. Ct. 2751, 2759, 189 L. Ed. 2d 675, 680, 2014 U.S. LEXIS 4505, *1. ("Courts have no business addressing whether sincerely held religious beliefs asserted in a RFRA case are reasonable."); *Employment Div., Dept. of Human Resources of Ore. v. Smith*, 494 U. S. 872, 887, 110 S. Ct. 1595, 108 L. Ed. 2d 876 (1990). ("Repeatedly and in many different contexts, we have warned that courts must not presume to determine the place of a particular belief in a religion or the plausibility of a religious claim."); *Presbyterian Church in U. S. v. Mary Elizabeth Blue Hull Memorial Presbyterian Church*, 393 U. S. 440, 450, 89 S. Ct. 601, 21 L. Ed. 2d 658 (1969) (holding that "the First Amendment forbids civil courts from" interpreting "particular church doctrines" and determining "the importance of those doctrines to the religion."); *Ben-Levi v. Brown*, 136 S. Ct. 930, 934, 194 L. Ed. 2d 231, 235-236, 2016 U.S. LEXIS 991, *10-12. See, *Holt v. Hobbs*, 574 U.S. 352, 352, 135 S. Ct. 853, 856, 190 L. Ed. 2d 747, 747, 2015 U.S. LEXIS 626, *1, 83 U.S.L.W. 4065, 93 A.L.R. Fed. 2d 777, 25.

3. I write to alert this Honorable Court concerning actions by state government agents taken to apparently impede and obstruct my access to the

Courts in this proceeding. I object to such interference, and reserve these issues for appeal, mentioned in part in Exhibit 55, attached hereto, and mentioned below, incorporated herein as if part of this letter, and in my brief, below. Dckt 60 at 63-64.

4. The First Amendment prohibits state officials, employees and agents from retaliating against claimants, such as myself, for exercising their right of access to the courts.

5. "Retaliation by public officials against exercise of First Amendment rights is itself violation of the First Amendment." *U.S.C.A. Const. Amend.* 1. *Zilich v. Longo*, 34 F.3d 359 (6th Cir. 1994).

6. A representative of the Chancery Court staff misled me into almost missing my deadline to file a notice of Exception. See, Docket 54, December 1, 2020 letter, regarding Due Process concerns, also contained in Docket 90, combined with Docket 36, attached to the notice as Exhibit F- Exhibit 55.

7. The representatives at the Chancery Court demeaned me apparently based on poverty, association or religious beliefs. See, Id.

8. I asked the Master for her help. She kindly helped me. Dckt 55, 58.

9. In addition, the ODC impermissibly interfered with this case by contacting Judge Clark, per Judge Clark's admission.

10. In mid-April, Judge Clark appeared to threaten me at BJs, a store, located in Millsboro, Delaware, as if I was on trial for standing up for my faith in Jesus, solely based on my exercise of seeking relief in court based upon alleviating the government sponsored burden government-religion has caused on my free exercise of religion in the action below.

11. The ODC and Judge Clark clearly violated or encouraged the violation of the judicial Code of Conduct, by seeking to use their government power to obstruct my case, showing partiality to the Defendant, the President of the United States.

12. "Supreme Court's two-step *Saucier* analysis governs whether a government official is entitled to qualified immunity, considering: (1) whether the facts alleged by the plaintiff show the violation of a constitutional right, and (2) whether the right at issue was clearly established at the time of the alleged misconduct." *Werkheiser v. Pocono Twp.*, 780 F.3d 172 (3d Cir. 2015).

13. Judge Clark knew or should have known that seeking to use his cloak of government authority, as a respected, fair judge, to chill or condemn or interfere with my ability to bring this case without government retaliation or pressure violates the Delaware judicial Code of conduct. See, *The Delaware Judges Code of Judicial Conduct,* Canon 1, "A judge should uphold the integrity and independence of the judiciary," Canon 2, "A judge should avoid impropriety and

the appearance of impropriety in all activities," Canon 3. "A judge should perform the duties of the office impartially and diligently," Canon 7, "A judge should refrain from political activity inappropriate to the judge's judicial office."

14. My right to a fair, unobstructed trial to alleviate a substantial burden upon my free exercise of religion is a constitutional right.

15. "Congress, the Executive, and the Judiciary all have a duty to support and defend the Constitution." *Salazar v. Buono*, 559 U.S. 700, 130 S. Ct. 1803, 176 L. Ed. 2d 634 (2010)

16. "There is no 'de minimis' defense to a First Amendment violation." Doe v. Indian River Sch. Dist., 653 F.3d 256, 259, 2011 U.S. App. LEXIS 16121.

17. "The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury." Mullin v. Sussex County, 861 F. Supp. 2d 411, 415, 2012 U.S. Dist. LEXIS 67571, *1

18. I will likely continue to suffer government threats by the state if the Court does not help me by upholding the Constitutional limits from state overreach.

19. I am standing up for my personal freedom to worship Jesus according to the dictates of my conscience, even if no one else shares the same beliefs, without government persecution.

20. I am permitted to believe differently than the government through its agents, even if what Jesus teaches seems foolish to the world. 1 *Corinthians* 1:18, 2:14-16.

21. "Government official's conduct violates "clearly established" law, so that the official is not entitled to qualified immunity, when, at the time of the challenged conduct, the contours of a right are sufficiently clear that every reasonable official would have understood that what he is doing violates that right." Id.

22. I do not wish to have any disciplinary action against any of the government representatives for misconduct. I desire fair access to the courts, without government persecution based on my exercise of redressing a grievance to alleviate the burden upon my free exercise of religion from Government sponsored religious persecution directly caused by government establishment of government-religion and government-religious views.

23. I object to disparate treatment based on religious affiliation on due process, first amendment and equal protection grounds. I object under RFRA too. See, *Tanzin v. Tanvir*, 141 S. Ct. 486, 208 L. Ed. 2d 295 (2020). The Supreme Court in dicta explained RFRA applied to state and local employees and agents, not merely federal officials.

24. I received additional pressure by the arms of this Honorable Delaware Supreme Court on May 24, 2021. I received an E-mail offering alleged help from an arm of the Court, the Delaware Lawyers Assistance Program ("DE-LAP"), from Carol P. Waldhauser, Executive Director, copying a mental health professional, relating to a past request for a waiver of attorney filing fees. Attached hereto as an Exhibit.

25. It was not help to pay the fee. I paid the fee long ago, though I did not receive a response from this Honorable Supreme Court, per my request back in January 2021 or secondary request in February 2021. I certainly hope this Honorable Court did not instigate the abuse by its arms. If so, please desist.

26. DE-LAP was looking after its own interests, which conflicts from mine.

27. I am a Christian. I believe people go to hell for trusting in what psychologists, mental health professionals, psychiatrists and behavioral theorists teach, which often is focused on being happy or productive materially instead of being holy. The organization premises its existence on mental health theories which I believe harm people. I believe such theories teach patients to seek to fulfill their own material desires instead of doing what is right, thereby teaching people to reflect a little piece of hell on earth, the image of Satan by living for self, conditionally caring based on relationship, reward and avoidance of harm with no

sacrificial unconditional love or God in them, teaching a lie that damns. See Isaiah 14 to understand how Satan wanted to be his own God, as high as God, to place self-first. I believe their thinking misleads patients to hell, especially BJ Skinner's theories, which most teachers, including myself learned.

28. These mental health professionals focus on misleading people to feel good, not be good, which is not good. I believe it is evil, misleading those they exploit for a paycheck to harm and hell.

29. Carol P. Waldhauser created the appearance of a threat by inaction by requiring a response within ten days.

30. While I believe artificial entities without hearts such as the ODC and DE-LAP, per se behave based on the mark of beast, absence of love, survival, for reward and avoidance of harm, serving greed by exploiting need, not doing good by their love of humanity, but seeking to control, eliminating free will by forcing the entities' will, its interest by threat of punishment, this Court has the power to reign in beasts, aka artificial entities without hearts, organizations, LLCs, corporations and such, with restraint in the form of the rule of law, which teaches love of humanity, not exploitation to serve the beasts' interests, the love for profit and praise at the cost of inhibiting freedom in the form of free will, freedom of

conscience by forced will under the threat of government sponsored persecution by funding such entities or otherwise.[1]

31. I have the freedom to chase after God instead of chasing after money at this time in my life.

32. I have the freedom to pursue my religion by justice in the courts, to protect my freedom to worship by the dictates of my free will, not the forced will, not the dictates of the state through its agents to worship money, which I believe leads to damnation.

33. I believe business greed is the mark of the beast. Jesus teaches you cannot serve God and money. Matthew 6:24. 1 Timothy 6:10, I stand by God.

---

[1] I did not know how bad the world was until I ran office. I think artificial entities without hearts, charities, organizations, not for profits and businesses through alternative entities ("beasts") tempt world leaders through donations, signatures or support in elections, essentially controlling the leaders to mislead by serving the leaders' self-interest by serving the beasts at the expense of the people. The entities who appear to control the world through world leaders arguably likely have contacts in Delaware. I have been writing US Attorney General Garland concerning ideas how he may persuade this Court to save the world in other cases, including one to alleviate an economic crash using laws like 18 USC section 666, considering bailouts, grants and tax breaks as bribes, especially concerning the big payouts in 2020. The courts can tame beasts without hearts with the rule of law, since Judges are not beasts or mere puppets of power or mere robots. Judges are powerful because they may choose to reflect the image of God by love for humanity, sacrificing potential profit for people, making many people richer in love and materially, instead of the few. Entities without hearts who seek to get as much as they can for as little as they can will devour humanity, if humanity does not tame it. The heartless entities will seek to control people, if the courts do not take control of them, forcing people to reflect the image of Satan by behaving like heartless beasts too. I hope the Delaware courts will be our world's hero should an economic crash occur too, saving lives and eternal lives.

34. I am in danger, a different type the bodily harm I will discuss in my brief, albeit I have been visibly shaken up clenching my teeth, and have cried concerning the state attacks related to this motion too.

35. Justice in the courts is a command by God. Amos 5:15. "Justice, mercy and faithfulness are greater commands" superseding concerns relating to costs and convenience. Citing Matthew 23:23.

36. Courts should sacrifice potential profit to serve people, not sacrifice people for the love of profit through entities' unjust gains.

37. Please instruct your arms to stop bothering me or other relief this Honorable Court deems just, and to allow me to pursue my case without government threats.

38. I respectfully request the Court guide its arms through relief it deems just. I suggest correction through loving instruction, guidance to prevent additional government interference in this action. Please help.

39. On an aside, I am crying as I type this since I am reliving the wounds of the past where an arm of the Supreme Court economically persecuted me to protect those with shared interests.

40. While I took the Delaware Bar my ceiling at the dorm caved in with a leak and destroyed my bar materials, I paid thousands of dollars for. I complained to the supreme court. As a result, an arm of the court, the Board of Bar Examiners

punished me and threatened me and made a complaint against me because I asked for help.

41. Where you see smoke, you think fire. I joined RLF on a contract for about $135,000 a year. I did not get my contract renewed as the law firm participated in my bar admission.

42. Prior to that in law school, I had rats in my apartment the last semester and during bar exams. I complained.

43. Duquesne, a Christian Law School responded by blaming me and hiking up my rent.

44. The press helped me by putting me on TV and the newspaper, but no actual relief resulted, only harm. I was freaked out and emotionally exhausted. There was a bunch of baby rats trying to climb up my bed as I tried to get sleep. I was horrified. I did not pass the bar the first time. I got super high scores the second time and allegedly high scores in Delaware passing on the first try. I should not be ashamed. I am disappointed in the cold heartedness by the officials of a Christian law school.

45. While I was in law school, my brother was also in an accident. I sought permission to travel and take off time to delay my first bar exam, to see my brother, to make sure he would live.

46. Duquesne said yes. But a day or two before the exam I found a note in my box. They changed their mind. They tried to call me. I did not have a phone. I do not buy things I cannot afford. I go without as incurring debt is against my religious beliefs.

47. I took the exam in Civil Procedure, and received my worst grade, and hated civil procedure ever since as a reminder of the cold heartedness of the Christian university.

48. The fact I have a heart to fight heartless beasts, including charities, not for profits, businesses and churches, does not make me weak. It makes me human with the power to reflect the image of God by love, stronger than heartless beasts who seek cold hard cash for survival.

49. My cousin, Peter Conaboy ("PJ"), also was murdered while I was in law school. So, this is all very painful to relive, and to be reminded of by the May 24, 2021 letter.

50. His mother, my Aunt Jackie Conaboy is in the hospital now. She is doing poorly. She may not make it in this life or the next. At PJ's funeral the priest said "hurry it up. I have a luncheon" as people shared stories about PJ. I scolded the priest as I left. "What would Jesus say." My aunt Jackie remembered that. Ever since then, she has not gone to church, and she turned to wine not God for comfort. I do not think she will go to heaven, if she does not turn towards God

for comfort. I pray, but recognize prayers are not enough at times since people have free choice. She may die soon. God's plan is the same for all. I discern whether people are lost or saved, whether they do man's plan or God's. She is not okay.

51. I learned early to turn to God for comfort, not to turn to any imperfect person or thing in this world for my comfort. I am not like the world. I am sad for the world, as I seek to heal it with love, through justice in the courts, shedding light on evil, not celebrating evil as good.

52. While scars remain well beyond our fleeting lives, harming future generations, and relived by new attacks such as the May 24, 2021 attack, this Court can prevent future harm to me by government actors misbehaving by seeking their own power and profit in this case, right here, right now, before it is too late, and additional harm is incurred, lasting beyond the fleeting lives of the perpetrators who act on self-interest, not love.

May 25, 2021

Respectfully Submitted,

/s/ Meghan Kelly
Meghan Kelly
34012 Shawnee Drive
Dagsboro, DE 19939
pro se, as a party, not an
attorney advocate
meghankellyesq@yahoo.com

EXHIBITS THERETO

EXHIBIT

55

December 1, 2020

Court of Chancery Courthouse
34 The Circle
Georgetown, DE 19947

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

Due Process concerns

Dear Honorable Master Patricia W. Griffin:

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

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

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

I sensed this when I when I felt mistreated by your staff around October 12, and October 13, and went home crying for days. See Exhibit A, emails, admissible under the present sense exception.

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

I am without the insulation or protection of counsel. I am the party. The staff may more freely scold and criticize attorneys without display of improper partiality towards a party.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Respectfully Submitted,

Meghan Kelly, Esquire
Pro Se
34012 Shawnee Drive
Dagsboro, DE 19939
(Word Count 993)

Exhibit A

Re: Thursday afternoon/Meg/3 Original summons/

meghankellyesq@.../Inbox

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

Oct 14 at 9:20 AM

Hi Arline,

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

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

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

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

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

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

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

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

Thank you.

Love,
Meg

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

Hello Meg,
Please come on THURSDAY before 11:00 a.m.

-----Original Message-----
From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Tuesday, October 13, 2020 6:46 PM
To: Kruger, Katrina (Courts) <Katrina.Kruger@delaware.gov>; Kruger, Katrina (Courts) <Katrina.Kruger@delaware.gov>
Cc: Simmons, Arline (Courts) <Arline.Simmons@delaware.gov>
Subject: Thursday afternoon/Meg

Hi Katrina and Arline,

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

Thank you,
Meg

RE: Monday Meg Kelly

meghankellyesq@.../Inbox

Simmons, Arline (Courts) <arline.simmons@delaware.gov> Oct 14 at 3:52 PM
To: 'Meg Kelly' <meghankellyesq@yahoo.com>, Kruger, Katrina (Courts) <katrina.kruger@delaware.gov>

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

-----Original Message-----
From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Wednesday, October 14, 2020 3:41 PM
To: Simmons, Arline (Courts) <Arline.Simmons@delaware.gov>; Kruger, Katrina (Courts) <Katrina.Kruger@delaware.gov>; Kruger, Katrina (Courts) <Katrina.Kruger@delaware.gov>
Cc: Meg Kelly <meghankellyesq@yahoo.com>
Subject: Monday Meg Kelly

Hello,

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

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

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

Thank you.
Meg

Meg/Sorry Katrina/Meg is not an attorney advocate in this case meghankellyesq@.../Sent

Meg Kelly <meghankellyesq@yahoo.com> Oct 15 at 12:20 PM
To: katrina.kruger@delaware.gov, katrina.kruger@delaware.gov
Cc: Simmons Arline (Courts) <arline.simmons@delaware.gov>,
Meg Kelly <meghankellyesq@yahoo.com>

Hello,

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

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

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

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

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

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

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

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

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

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

Thank you. Have a good weekend.

Kind regards,
Meg
Meg

Exhibit B

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

From: Meg Kelly (meghankellyesq@yahoo.com)

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

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

Hi Katrina,

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

Thank you,
Meg

----- Forwarded Message -----
From: Meg Kelly <meghankellyesq@yahoo.com>
To: Kruger, Katrina (Courts) <katrina.kruger@delaware.gov>; Simmons, Arline (Courts) <arline.simmons@delaware.gov>; McKinnon, Brenda (Courts) <brenda.mckinnon@delaware.gov>; Boyer, Sheila (Courts) <sheila.boyer@delaware.gov>
Cc: Bauer, Cecelia (Courts) <cecelia.bauer@delaware.gov>; Meg Kelly <meghankellyesq@yahoo.com>
Sent: Monday, November 30, 2020, 01:14:02 PM EST
Subject: Re: Meg v Trump Case 2020-0809 -PWG/letter Requesting permission to exceed the Rule 171(f) word limit

Hi Katrina and Sheila,

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

Thank you for your suggestion, and understanding.

Have a good day.

Very truly,
Meg

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

Thank you, Katrina –

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

Sheila

Sheila L. Boyer

Judicial Case Management Supervisor

Register in Chancery Wilmington

500 N. King Street, Suite 11600

Wilmington, DE 19801

302-255-0552

From: Kruger, Katrina (Courts) <Katrina.Kruger@delaware.gov>
Sent: Monday, November 30, 2020 12:48 PM
To: Meg Kelly <meghankellyesq@yahoo.com>; Simmons, Arline (Courts) <Arline.Simmons@delaware.gov>; McKinnon, Brenda (Courts) <Brenda.McKinnon@delaware.gov>; Boyer, Sheila (Courts) <Sheila.Boyer@delaware.gov>
Cc: Bauer, Cecelia (Courts) <Cecelia.Bauer@delaware.gov>
Subject: RE: Meg v Trump Case 2020-0809 -PWG/letter Requesting permission to exceed the Rule 171(f) word limit

Hi Meg,

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

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

Thanks,

Katrina

From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Monday, November 30, 2020 12:15 PM
To: Simmons, Arline (Courts) <Arline.Simmons@delaware.gov>; Kruger, Katrina (Courts)

<Katrina.Kruger@delaware.gov>
Subject: Meg v Trump Case 2020-0809 -PWG/letter Requesting permission to exceed the Rule 171(f) word limit

Good morning,

I hope you are safe and well.

I wanted to give you a head's up. On Friday, I mailed the attached letter requesting permission to exceed the Chancery Court Rule 171(f) Rule word limit for briefs and the related certificate of service to Defendant Barr.

Could you please confirm receipt, once it is docketed?

I see in under Rule 171(c) that I merely have to drop off the brief to the Court, and the Court will mail it to the upper DE Vice Chancellor. This is weird for me. I am learning it is unusual for you too. I really appreciate your time and assistance even more. Thank you.

I actually mailed the letter and the certificate of receipt to the upper Delaware Court and your court too. So, you may not have to mail what I sent if he confirms receipt or dockets it first. Sorry for mailing it to both courts.

Thank you. Have a great day.

Very truly,

Meg

October 19, 2020

Court of Chancery Courthouse
34 The Circle
Georgetown, DE 19947

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

Dear Honorable Master Griffin:

Thank you for taking the case.

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

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

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

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

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

Although I am cognizant of the pro Trump atmosphere in this county, I have faith in the fair impartial rule of law by this Honorable Court.

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

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

This is the corporate capital of the globe.

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

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

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

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

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

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

Creating jobs is not a gift.

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

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

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

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

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

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

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

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

I am grateful for the opportunity to be heard.

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

Thank you,

Meghan Kelly
Pro Se
34012 Shawnee Drive
Dagsboro, DE 19939
(Words 1000)

SOLACE and LAC

From: Carol Waldhauser (cwaldhauser@de-lap.org)

To: meghankellyesq@yahoo.com

Cc: emkiesel@aol.com

Date: Monday, May 24, 2021, 11:58 AM EDT

Meghan:

Please find attached a self-explanatory letter.

Please contact us within the next 10 days regarding it.

Thank you.

Carol

Carol P. Waldhauser, Executive Director

The Delaware Lawyers Assistance Program

(DE-LAP)

405 N. King Street, Suite 100B

Wilmington, DE 19801

(302) 777-0124

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cwaldhauser@de-lap.org

www.de-lap.org

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

-Carol P. Waldhauser, Executive Director

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Lawyers Assistance Program

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MAY 24, 2021

CONFIDENTIAL

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

Dear Meghan:

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

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

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

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

Very truly yours,

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

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

Electronically forwarded with encls: meghankellyesq@yahoo.com

A-5

IN THE SUPREME COURT OF THE STATE OF DELAWARE

Meghan Kelly, Plaintiff Below, Appellant, v. Donald Trump, a.k.a. Donald J. Trump, a.k.a. President Trump a.k.a. President Donald Trump, in his official capacity as President of the United States Defendant Below, Appellant,	)	No. 119, 2021

APPELLANT'S MOTION FOR THE DELAWARE SUPREME COURT TO REQUIRE THE RECUSAL OF THE HONORABLE CHIEF JUSTICE COLLINS J. SEITZ, JUNIOR IN THIS MATTER

1. I, Meghan Kelly, pro se appellant, unopposed, having been granted in forma pauperis relief, move this honorable Delaware Supreme Court, unopposed, move to recuse the Honorable Chief Justice Collins J. Seitz, Junior ("Chief Justice Seitz") from participating in review of my case, requiring delegation to the other honorable Justices.

2. On about May 25, 2021, I sent the honorable Court *Appellant's (unopposed) Motion to guide or reign in the arms of the Delaware Supreme Court,*

or for other relief this Court deems just, (the "motion"), incorporated herein as if included in the first instance. I suggested private guidance. Motion at 1, 37, 38.

3. One of the allegations in the motion was concerning De-Lapp's response to a request for a suspension of bar fees to serve De-Lapp's purpose not to help to pay any fee since I paid such fees. Motion at 24 -30. Attached please find my receipt of payment of the Bar registration fee, incorporated as an exhibit, as if expressly stated herein.

4. I attached the May 24, 2021 attack letter as an exhibit to the motion, and incorporate it herein as if included as part of the motion.

5. In the May 24, 2021 attack letter, Carol Waldauser and Eleanor Kiesel state, "We understand that you may be experiencing some financial difficulties with regard to license fees."

6. The only person who knew I made a request for suspension of Attorney Registration of license fees is Chief Justice Seitz, since I made the request to him, and Mark Vavala.

7. I reached out to Mark Vavala ("Mark") per the emails, attached herein and included and incorporated herewith as if alleged as part of this motion ("Emails"), admitted under the state of mind exceptions, belief and admissions. See Exhibit, the Emails.

8. I turned to Mark for guidance, as he has always treated me as a judge should, with respect regardless of poverty, religious belief or association, as to requesting relief for attorney registration fees.

9. In the past I turned to Mark when he was a commissioner when Cathy Marshall, the former Supreme Court Clerk treated me with great cruelty and disregard for humanity for cost and convenience, reflecting the image of Satan with regard to unbending rules and penalties regarding the rather unsafe requirement of registration online and by required use of emails during a heightened time of increased threats to electronic hacks.[1]

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[1] I am trying to persuade US Attorney General Garland to close the back doors on electronic devices President Bush Junior opened up under the guise of safety from terrorism. Bush opened the door to economic, speech and privacy attacks, making the entire globe less safe, especially with regards to health data, health insurance hacks and systems in recent years. Our information is more easily manipulated making us believe we are safe when the pandemic may not be waning as much as suspected. Please note, worldometer has not been reporting all states in its data but has excluded about ten states every day for the past two weeks. I suspect it is being manipulated, hacked, to market the vaccine as working better than it is. I have checked worldometer every day for over a year. They included most states every other day. This is strikingly concerning to me. See, Dckt 71, Exhibit E, Exhibit 26, copy of the web site worldometer, to show healthcare is the biggest global money maker and expense.
Bush sold our freedoms for money by opening the door to those who will kill, steal and destroy or diminish freedoms and lives to gain more material gain. Freedom is not for sale. People are not for sale, to those who require they pay for freedom. People are priceless not price tags, worthy of protection by this Court. Throwing money at a problem or grants is never the solution. Neither is money given to government agencies without strings attached. The spend it as you see fit or lose it provisions reward waste. Strings attached to laws must be tied with all government money offering guidance for good not evil greed, the mark of the

damned. The desire for more government money for government partnered entities under the guise of charity or otherwise, including churches, is the problem. Business greed, to use for the study of things, science to manipulate to gain grants or business profit for something different or for a different fix instead of removing the problem should end. Entities are rewarded with more money by not resolving the problem. Government must fund itself, not pay bribes to entities which per se try to get as much as they can for as little as they can. Then, such entities may supplement with fundraising and charity which I believe damns people to hell. Schools, sports and the post offices would be fully funded if the government paid bills instead of bribes. Children learn to go the way to hell by learning early to rely on associations and organizations, artificial entities without hearts, that run on the mark of the beast to represent their interests, instead of choosing to use their own brains to think, to care, to know, to love, individually and specially, as the treasure they are. We lose treasures to hell. Children are forced to fundraise for sports and schools which will damn them to hell should they not unharden their heads and learn such evil is bad, all to pay bribes of government agents to serve their interest. Property taxes should not be increased to fund government bribes, thereby creating disparate treatment by zip code, based on home values in violation of the Equal Protections Clause applicable to the states via the Fourteenth Amendment, with no rationally related purpose. The government would decrease waste, create a more fair, equal and just union if government employees, including Presidents and law makers, did their jobs instead of exploiting tasks to serve government agents personal interest including but not limited to getting out of work or liability, while arguably creating artificial debt in violation of the 13th amendment to serve greed not need, by paying entities to profit off of its government duties at a greater bill to its people in terms of not merely monetary loss but loss of constitutional freedoms. It is an abomination. The government itself is a heartless beast should the agents not use their power to individually use their free will, their brains, to think, to care, to know, to love people, instead of acting as heartless robots going through mechanical motions of a system. Then brainlessly blaming the system, instead of themselves, for problems they cared naught to address.

I digress, government funding for science is bad and a black hole, that should be closed from sucking the life blood and souls out of humanity by indentured servitude to feed unsatiable greed by entities without hearts. Just laws, just policies and justice in the courts is the solution to close the black hole. The government rewards businesses for made to break, made to repair and replace products, polluting in the production and polluting with replaced parts and products in the landfills. The US through its unjust decrees, including but not limited to the UCC, tax code wrote offs and insurance laws is the reason why the

world is so polluted. China would not make made to break, service and replace products if our courts and laws did not reward such, instead of made to last goods, decreasing polluting in production and in parts. Money is never the solution, since it rewards misbehavior, to create the endless lust for greed to make something different, or use of a product for a different function, not made to last, not made to work. Science is the study of things. When the pupils, doctors and scientists declare themselves to be the masters of the universe on a subject, the experts, or knowing the answers, they are per se stupid, and defeat science. Science, after all, is the mere study of things, not the master of things as defined by the scientific method with built in recognized uncertainties called variables, unknown and known. Meaning possible error, not knowing everything, is declared as part of the scientific method. Learning is good, but manipulating data while using good science, retrieved from tests for self-gain, not knowledge, is deceptive and wicked. Our government appears to be partnered with private industries, not for profits, businesses, and churches, by bought or bartered for bribes, in exchange for loyalty or backing of elections, paid with money taken from being used for the people's need, government infrastructure, not Biden's bad plan either, to be used to pay entities to perform the government's job because the government employees evade responsibility of working and blame for expenditures and plans not working, grants and bailouts to exploit the problem to waste money and cause harm to the world for self-gain, by creating industries to profit off of the problems instead of correcting the problem by making the world more safe by closing the back doors in electronics, including but not limited to making lawyers money by adding an unnecessary additional field, insurance companies, fields for miners who sell our data, anti-virus software companies. I am still brainstorming constitutional and criminal theories to persuade the US AG Garland to save us regarding foreseeable looming threats not by people but by entities without hearts, businesses, LLCs and such, by protecting our freedom of speech without government sponsored or encouraged threats against privacy or speech, and a potential 13th amendment argument regarding artificial debt which is a sin against God in the old testament especially, called inequity and will damn the perpetrators to hell despite their stupidity and ignorance. See, Matthew 13, Hosea 4:6. It is no small matter. It is a matter of heaven and hell. The Bible teaches people go to hell for misunderstanding evil for good and good for evil. Not knowing can kill you eternally. You have to care to think, care to know, care to love to escape the fire of the second death at the resurrection of the dead the last day. You must use you free will, your brain, not your belly, meaning your desires. *Philippians* 3:19, "Their end is destruction, their god is their belly (meaning their appetites, their desires), and they glory in their shame, with minds set on earthly things." I argued

that Trump does not use his brain, but is reigned by his desires, the mark of the beast, the whore, the damned, the mark sadly most of humanity has should they not erase that mark before it is too late and they are dead. See Dckt 60 at 21,94,123, 124, 413. Trump is reigned by desires, emotions, instead of laying down his desires, to care to think to love others, by sacrificing to self. I am pointing this out to confirm believe not using your brain to think, to care, to love, is sin.

As a licensed teacher, previously substituting in the schools, I tried to teach kids they were loved and respected no matter whether they failed or succeeded, and to love and respect one another regardless as to whether others succeed or fail. I taught them to think for themselves, instead of writing what they thought I wanted to hear. I taught them their diverse unique view made us all smarter, by shedding light on a different perspective. I tried to teach kids the way to heaven young by Jesus's new command in John, to love one another, without violating the separation of church and state, without using God's name or bible verses in vain. I am pointing this out as I try to live my faith, live my religious beliefs by doing the will of God, through understanding Jesus's words. I believe Jesus is not kidding.

I also have ideas on how Attorney General Merrick Garland can safeguard the right to vote, and eliminate the temptations for law makers to create unjust decrees and policies by removing three temptations to do so, eliminating money in politics, ending entity and private backing with money, by allowing the people to more equally and freely, not by purchase of support or opposing a candidate by the only equal, fair, free form, the vote.

Our laws fund grants for science that serve greed, the bottom line, not learning or truth to improve societal conditions. Our tax laws, grant policies and other laws increase temptations to make made to break, made to replace, polluting in the production, and polluting by throwing away replaced parts and products in landfills into infinity, to gain more money by selling replacement parts or products. More grants are given out for some different research. Greed for money is rewarded, driving out love for humanity leading to exploitation of the people and the environment, and I believe damnation in hell.

Additionally, our health care harms health to make people feel better, by feeling nothing, or by masking the ailment, often inhibiting people's faculties, their ability to use their free will, their brain, their mind, I believe guaranteeing their damnation in hell. I believe eternity is determined at the last day of your life. (See, Docket 77, Exhibit F, Exhibit 43, Article I drafted and factors relating to my passion to improve healthcare, to care for the sick and elderly's health, not destroy health by comfort care, eliminating the pain by causing patients to feel nothing, like vegetables, often inhibiting their free will which I believe they need to use to go to heaven, likely misleading the sick and elderly to hell, which breaks my heart, 1.

10. Mark is not hard headed, hard hearted or hard handed. He understands the rules are there to serve humanity, not exploit humanity for the cost

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Coastal Point, Guest Column, *Representative candidate says health is wealth*, By Meghan Kelly, Esq., Candidate Delaware House of Representatives, 38th District, 2. Document, "*Your Health is your Wealth You are Priceless. Not a price tag*! Kelly seeks Federal Consideration of Health Care Proposal, 3. Meghan Kelly's teaching certificate, which goes to credibility. I learned psychology and behavior theories like BF Skinner's. I also am licensed to teach health so I know something about health. 4. Meghan Kelly's redacted law school transcript to show she took a course Health Care Finance and the course Law and Medicine while attending Duquesne School of Law. 5. Meghan Kelly's redacted undergraduate college transcript to show she took relevant courses related to

a. History of Western Medicine
b. Economics
c. Medieval Philosophy
d. Psychology courses

6. Evidence of surgery that requires I drink water, rest and eat so I do not faint or die due to dehydration when I have my period. I lose five pounds every month. This is still a challenge. I must assert my right to live because many people serve Satan by not wanting to be inconvenienced to care to adapt to safeguard my life, or the lives and health of others.)

Drugging the elderly and sick people up so they cannot use their free will to choose to think, to care, to know, to love removes their freedom of conscience to choose the way to eternal life.

It is healthcare, not comfort care, deceiving people to believe you are healing them only to be killing them in this life and the next by concealing pain. At this time, I may not have standing with these unrelated issues, but the Attorney General may have standing down the line. It is noteable, about 33 billion has been misused for years via NIH for bad healthcare that cares less about patients' health and more about entities' wealth.

Without protecting freedom of conscience, none are free, none have liberty, all are controlled by the forced will of heartless beasts, organizations and entities, even government, to serve what I argue is the mark of the beast, business greed. We must allow our judges to use their brain, their free will too, to think, to care, to love, instead of robotically adhering as troops in a war, where they no longer lead but are misled by heartless beasts that rule over them.

and convenience by those who wield government power. See *Matthew* 23:11, regarding Jesus's claim leaders are servants. I believe servants of self are misleaders and deceivers, who exploit those they are charged to serve to serve those who serve them thereby serving themselves, reflecting the image of Satan, aka children of the devil not choosing to be saved from the fire the last day by laying down their desires to care to love those outside their own, specifically those who inconvenience them, and their greed by need. See, *John* 8:47, 1 *John* 3:10-11, *Acts* 13:10, *Matthew* 13:38, regarding children of devil.

11. I thought I sinned against God by forgetting to look after Mark's daughter, an attorney within the arms of the ODC. I thought Mark's kid may have lost her job at the ODC, with the news of a new hiring at the ODC, because her father helped me in the form of guidance with regard to requesting a suspension or waiver of attorney fees from the Honorable Supreme Court by official request to Chief Justice Seitz. See Emails.

12. I realized the only two people on the planet aware of my request for the waiver are Chief Justice Seitz and Mark Vavala per that revelation in the E-mail. See Emails

13. In my horror and great sadness, I confronted Mark to determine whether he "threw me under the bus." Citing Emails. I quickly confronted him to determine the worst possible scenario to eliminate any doubt that may tarnish a

professional relationship based on mutual respect for the dignity of all, even one another.

14. I tested him. Mark did not instigate the ODC and DE-Lapp attacks. See Emails.

15. Besides passing the test, I trust Mark Vavala as a former judge, a commissioner, without partiality based on self-interest. I sought Mark's help for years to gain his wisdom and kind guidance. He is smart and wise, and unafraid of tough questions, because he answers honestly with integrity, even with the honest response, I don't know.

16. The conclusion Mark Vavala was not the perpetrator of potential abuse me, led me to determine that Chief Justice Seitz may have instigated the abuse by De-Lapp and the ODC.

17. The interest for fees for an arm may have tarnished Chief Justice's vision as I noted in my motion, the Supreme Court itself may have instigated the abuse. Motion at 25.

18. Far worse, the Chief Justice may have instigated attacks by the ODC and De-Lapp discussed in my motion because my second request relating to waiving attorney registration fees is based on and intertwined with religious arguments in violation of my free exercise and the RFRA which applies to state agents too, including judges and judges' agents, its arms, ODC, De-Lapp, and their

agents, foreseeably impeding and obstructing my access to the Courts in this proceeding.

19. I must correct my allegation at Motion at 25. I was blinded by my desire to persuade this court to save the world by saving me in my case, and possibly other matters, even if the court does not want to. Jesus says if we believe we can move mountains, we will move them. Citing Jesus, Mark 11:23. I believe I have an opportunity, not a guarantee, that I may move a mountain by moving this Court's justices' hearts to be our heroes. Mountains after all means impediments on our hearts, temptations to sin by comfort, costs and convenience instead of doing what is right. Id., (See, *Luke* 8:10. Jesus speaks in parables so only those who seek his will instead of their own or the mere will of man understand what Jesus says by mountains and in general. Others do not choose to use their brains, their free will, to understand God's will, God's plan which is love. They, instead, willfully are blinded by worldly temptations and do not use their brains to think, to care to know, to care to love in truth, not lust, not covetousness based on lies.)

20. I forgot, this court did answer my first request for a suspension of fees relating to attorney registration based on unemployment or financial impediment. I am including the response attached to and incorporated therewith as an exhibit. See, the Court's response attached hereto.

21. In a letter dated February 2, 2021 the Court responded, "The Court acknowledges receipt of (my) letter dated January 7, 2021, wherein (I) request that the attorney registration fees for lawyers out of work due to the pandemic be waived.

22. I responded per the attached February 5, 2021 letter, attached hereto and incorporated herewith in toto, as an Exhibit. I provide in part:

> "Thank you for the February 2, 2021 letter in which the Court indicated it would consider requests for waivers of attorney fees on a case by case basis, by formal request.
> My concern, is accepting applications for waivers on a case by case basis violates the Equal Protections Clause applicable to the State's agencies, even the courts via the 14th Amendment, by disparate treatment within a class. I am likely not the only one out of work due to the pandemic. Others are struggling too. A case by case determination would likely be per se unconstitutional.
> I will likely never have standing to stand up for those similarly situated with myself. Yet, if I made such a request, I would be asking the Court to treat me with preference instead of impartiality as required by law.
> My conscience may not allow me to make such a request, tempting this Honorable Court to misbehave to serve my own gain.
> I can, however, request that all fees for attorney registrations be the same regardless of years barred. So, I am making such a request for future consideration for 2022 and beyond. Please treat all lawyers the same by requiring the same lawyer registration fee for every lawyer, without persecution towards attorneys with more years of experience by an increased fee. There is no rational basis for an increase in lawyer's fees based on number of years, except the desire for more money.
> It is wrong to assume the longer you have been barred, the more money you have or must pay.
> I am saddened when I see unjust decrees and policies based on the love of money, desire for money, at the cost of driving out the love for humanity, the people the state serves.
> On an aside, the reason why I became a lawyer is my faith in Jesus Christ. Justice in the Courts is a command by God. See Amos 5:15. Jesus Christ

taught that "justice, mercy, and faithfulness" are more important commands. Matthew 23:23.

23. In my second request relating to attorney fees, dated February 5, 2021, I go on to discuss more religious concerns therein.

24. I note, Mark Vavala in the Email exhibits noted 5 other attorneys reached out to him regarding attorney fee cost issues.

25. Imagine how many other lawyers may be struggling due to the pandemic, possibly catching the sickness or caring for a loved one or merely life's struggles unforeseeably hampering lawyer's capability to pay the Registration fee.

26. Such case by case application creates disparate treatment by the hidden reign of lusts or likes as it suits the judges interests, not the impartial rule of law, without selective application.

27. The Court should create a form that permits lawyers without the ability to pay to waive such fees, to automatically apply for waiver based on debt or financial burden, and such waivers should be freely given, instead of enslaving already financially desperate people with additional pressure.

28. No one is above the law. No one is below the law, not even judges who administer the laws. Judges must maintain their independence from self interest, and their appearance of independence.

27. "The Founders rejected the medieval myth that sovereign (rulers, even judges and Presidents) are anointed by God to rule over them. The Founders laid a

new foundation for our country, based not on the lie of divine right, (but by free choice, the free will of the people based on the universal belief that) all people are created equal and all just powers are derived from the consent of the governed. They changed the very source and nature of Law. Law does not emerge from the mouth of a king but rather the votes of the freely chosen representations of the people," with limited, not absolute power, limited by the Constitution by the Courts. Citing, Duquesne Lawyer, *The Rule of Law, the Constitution and Democracy,* by Wilson Huhn, Professor of Law, Spring 2021 Edition.

28. Partiality and the appearance of impartiality must be maintained in my case to protect the integrity of the courts.

29. I seek to protect the judiciary.

30. To maintain the integrity of the three branches of government.

31. In this United States, the Founders created checks and balances to prevent and fix branch overreach. The fact a check is made, means the system is focused on maintaining a more equal, fair, just union. Humans with hearts are in control and in charge of choosing to maintain, and service the checks on the executive, judicial and legislative branches, like a car in need of oil to run better. People must choose to use their brain to care to think, to care to know, to care to love humanity, instead of comfort, convenience and cost by avoiding tune ups in our system of government.

32. The fact I seek correction will not prevent me from seeking protection of the same system I am seeking to tune up through law suits, to prevent the engine of our nation from failing us, the impartial rule of law.

33. The Courts can uphold the integrity, encourage faith in the system by having the humility to understand it is run by imperfect people in need of guidance through checks and balances, the executive branch, the legislative branch and even the judiciary.

34. In addition, my little cousin, Ikey Adams, a family member, is a partner in Sidley Austin, in DC, where Chief Justice Seitz's daughter appears to work too.

34. These two issues, as to who instigating the government threats via the ODC and De-Lapp, and the familial relations, create the appearance of partiality, or bias that may blemish a rather historical case, should this Court allow me to go forward with arguments.

35. The President(s) need the court's heavy hand of loving guidance to reign in the Presidents' abuse and misuse of power and government funding by dissolving the establishment of government-religion. President Bush Junior, President Obama, President Trump, and President Biden all misbehaved, and misbehavior will continue well past their fleeting lives, should this court fail to declare the Presidents are not above the Constitution. Sovereign immunity seems

to be waived for RFRA claims per the Supreme Court against officials, including the President. *Tanzin v. Tanvir*, 141 S. Ct. 486, 208 L. Ed. 2d 295 (2020)

36. I respectfully request that the Honorable Chief Justice be recused from deciding this case.

May 28, 2021

Respectfully Submitted,

/s/ Meghan Kelly
Meghan Kelly
34012 Shawnee Drive
Dagsboro, DE 19939
pro se, as a party, not an
attorney advocate
meghankellyesq@yahoo.com

EXHIBITS THERETO

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

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

To: Meghankellyesq@yahoo.com

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

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

Billing Information
Meghan Kelly
19939
Meghankellyesq@yahoo.com

Shipping Information

Total: $353.00 (USD)

Date/Time:	6-Feb-2021 10:38:16 PST
Transaction ID:	62839723216
Payment Method:	Visa xxxx9775
Transaction Type:	Purchase
Auth Code:	748294

Delaware Supreme Court Attorney Registration
Wilmington, DE 19801
US
teros@doelegal.com

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

From: Meg Kelly (meghankellyesq@yahoo.com)

To: mvavala@dsba.org

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

Thank you Mark.

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

I am grateful, she has her job.

This is a serious matter.

Very truly,
Meg

On Thursday, May 27, 2021, 01:24:20 PM EDT, Mark Vavala <mvavala@dsba.org> wrote:

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

Again, you will remain in my prayers.

Mark

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From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Thursday, May 27, 2021 1:12 PM
To: Mark Vavala <MVavala@dsba.org>
Subject: Re: Nick of time response/Glad your kid is okRe: Your kid/meg worried

Mark

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

Thank you,

Meg

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

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

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

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

Please take care,

Mark

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From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Thursday, May 27, 2021 8:34 AM
To: Mark Vavala <MVavala@dsba.org>; Meg Kelly <meghankellyesq@yahoo.com>
Subject: Fw: Nick of time response/Glad your kid is okRe: Your kid/meg worried

Mark,

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

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

Thank you,

Meg

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

From: Meg Kelly <meghankellyesq@yahoo.com>

To: Mark Vavala <mvavala@dsba.org>

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

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

Hi Mark,

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

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

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

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

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

I asked the court to stand down its arms.

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

Thank you. Have a good day.

With love and gratitude your kid is okay,

Meg

On Wednesday, May 26, 2021, 07:17:58 PM EDT, Mark Vavala <mvavala@dsba.org> wrote:

Hi Meg. No worries! My daughter moved to New York after working with ODC only for a short while. She wanted to live in Manhattan. My niece Kathy still works at ODC.

Thank you for your kind words. I really hope that you are well and aren't too stressed over all the things you wrote me about last time. I think the last President did some horrible things and I'm hopeful we all get a break from that behavior. It would be nice if everyone just treated each other with compassion and kindness. We never know what someone is going through.

Please take care of yourself. And stay safe.

Mark

From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Wednesday, May 26, 2021 11:54 AM
To: Mark Vavala <MVavala@dsba.org>
Cc: Meg Kelly <meghankellyesq@yahoo.com>
Subject: Your kid/meg worried

Hi Mark,

You were kind to me, and respected me as a human, even if you did not agree with me over all these years.

Others have not been so kind. Thank you.

I am concerned that your daughter may have lost her job at the ODC, because you were kind, and treated people like me fairly, without disparate treatment based on poverty, religion or political association.

I am sad I did not write anything to the court to address that.

I am sorry people get into trouble in this world for doing the right thing.

I hope your kid is working at another safe place.

Thank you for being a hero by your love for humanity, not sacrificing people for profit or praise. That makes you different.

Love,

Meg

SUPREME COURT OF DELAWARE

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SUPREME COURT BUILDING
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DOVER DE 19901

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February 2, 2021

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

Dear Ms. Kelly;

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

Very truly yours,

/s/ Lisa A. Dolph

MEGHAN MARIE KELLY, ESQUIRE
34012 Shawnee Drive
Dagsboro, DE 19939

February 5, 2021

Delaware Supreme Court
55 The Green
Dover, DE 19901

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

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

I hope you are healthy and well. Thank you for the February 2, 2021 letter in which the Court indicated it would consider requests for waivers of attorney fees on a case by case basis, by formal request.

My concern, is accepting applications for waivers on a case by case basis violates the Equal Protections Clause applicable to the State's agencies, even the courts via the 14th Amendment, by disparate treatment within a class. I am likely not the only one out of work due to the pandemic. Others are struggling too. A case by case determination would likely be per se unconstitutional.

I will likely never have standing to stand up for those similarly situated with myself. Yet, if I made such a request, I would be asking the Court to treat me with preference instead of impartiality as required by law.

My conscience may not allow me to make such a request, tempting this Honorable Court to misbehave to serve my own gain.

I can, however, request that all fees for attorney registrations be the same regardless of years barred. So, I am making such a request for future consideration for 2022 and beyond. Please treat all lawyers the same by requiring the same lawyer registration fee for every lawyer, without persecution towards attorneys with more years of experience by an increased fee. There is no rational basis for an increase in lawyer's fees based on number of years, except the desire for more money.

It is wrong to assume the longer you have been barred, the more money you have or must pay.

I am saddened when I see unjust decrees and policies based on the love of money, desire for money, at the cost of driving out the love for humanity, the people the state serves.

On an aside, the reason why I became a lawyer is my faith in Jesus Christ. Justice in the Courts is a command by God. See Amos 5:15. Jesus Christ taught that "justice, mercy, and faithfulness" are more important commands. Matthew 23:23.

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

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

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

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

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

Many preach breaking the Sabbath violates Jesus Christ's teachings. Jesus teaches us we break a greater law of love by not safeguarding the

health and valuing the dignity of lives of others, by failing to break the 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.

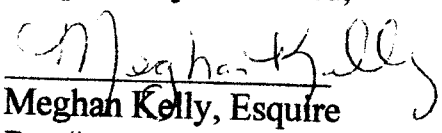
This Court does not have to believe as I do, to safeguard everyone's freedom to worship or not according to the dictates of their own conscience, without government sponsored persecution.

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

CC: LD, via Email

Smooth as butter is the bible concerning leaders who mislead with sweet nothings Psalm 55:21

Psalm 55:21 "His talk is smooth as butter, yet war is in his heart"

Freedoms are not for sale
Business is not religion
Business Greed is not God

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

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

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

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

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

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

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

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

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

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

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

Thank you for allowing me to share my concerns.

Exhibit P

U.S. COURT OF APPEALS, THIRD CIRCUIT

Meghan Kelly	)	Appellate Court
Plaintiff,	)	No.: 21-3198
v.	)	No. 22-2079
Disciplinary Counsel Patricia B. Swartz, et al.	)	District Court
	)	No.: 1:21-cv-01490-CFC
Defendants.	)	

Appellant Plaintiff Meghan Kelly's Opening Brief moving the Third Circuit Court of Appeals to vacate the Delaware District Orders (DI. DI 16-17, 30-31, 59-60), and to remand the matter to the Delaware District Court for consideration

Dated October 22, 2022

Respectfully submitted,

/s/Meghan Kelly
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IN THE THIRD CIRCUIT COURT OF APPEALS, APPEAL OF THE ORDERS BELOW OF THE DELAWARE DISTRICT COURT

Pursuant to 28 U.S.C. § 2106, Appellant Meghan Kelly respectfully prays this Court vacate the decisions by the Delaware District Court below ("District-Court"), (DI 16-17, 30-31, 59-60 (collectively, "District-Order")), dismissing my Complaint under the Younger abstention, denying by not addressing my Motion to amend the complaint (DI 43), and denying subsequent rolling motion(s), motion for PACER access, motion for an exemption of PACER fees, motion to appear remotely, exemption of court costs due to costs causing a substantial burden upon my access to the courts due to poverty, and religious beliefs against poverty, motion for a stay, and all previously denied motions, except motions that may now be moot or not yet ripe for determination. (DI. 11, 12, 20, 21, 29, 33, 34, 35, 39, 41, 43, 52, 54, 58, incorporated herein by reference in its entirety). The motions that are moot for review are the motions for temporary or preliminary restraining orders and motions for expediting relief. (DI 6, 7, 8, 9, 10, 14, 18, 36, 40, 47, 48, 49, 51, 53). The Motions not yet ripe for determination were filed after the District Court's Order, and must first be considered by the District-Court before this Court may review the District-Court's determination. (61, 62, 63, 64, 65, 66, 69-75, 77, 80, 81, 82, 83, 85, 86, 88, 89. 90, 91, 95, 96, incorporated herein by reference).

The District Court's decision must be set aside as clearly erroneous as a matter of law and as a matter of fact, creating manifest injustice against me. The District Court abused its discussion as to deny me the opportunity to be heard on Constitutional claims in the only forum with jurisdiction so as to render me without relief anywhere. The District Court refrained from examining the substance of my complaint and motion(s) to amend the complaints. The issue is whether the District Court has jurisdiction to hear my case. I argue Younger does not apply.

The District-Order must be vacated and this case must be remanded back to the District-Court to review the substance of my complaint, amended complaint(s), and motions.

JURISDICTION

The jurisdiction of this Court is invoked under 28 U. S. C. § 1343.

STANDARD OF REVIEW

The standard of review is de novo standard *PDX N., Inc. v. Comm'r N.J. Dep't of Labor & Workforce Dev.*, 978 F.3d 871, 882 n.11 (3d Cir. 2020).

STATEMENT OF CASE

This case arises from Defendants, the Delaware Courts and the arms of the Court interference in my RFRA law suit against former President Donald J. Trump in an attempt to intimidate me a to cause me to forgo my case based on the Defendants disdain for my religious-political beliefs contained in my speech, in my petitions, or poverty. (DI 2-4)

I initially brought Kelly v Swartz, et al, on or about October 25, 2021, for equitable relief, and **damages** caused by the Delaware disciplinary counsels', court members' and the State's interference in my Religious Freedom Restoration Act lawsuit ("RFRA") against former President Donald J. Trump (referred to as "Kelly v Trump"), in violation of 42 USC §§§ 1983, 1985, 1988. I sought claims for emotional distress, First Amendment violations, loss of employment opportunities, or other economic harm, and harm to my reputation. (DI 2-4).

I also sought claims for Defendants' selective prosecution in bringing a disciplinary action against me to demean my reputation by placing me on inactive disabled to conceal Defendants misconduct in collusion with the Delaware Supreme Court, and to punish me for

exercising the right to access the courts and First Amendment rights, based on Defendants disdain for my religious-political beliefs contained in the speech in the Religious Freedom Restoration Act petitions and other petitions. Id.

I later amended the Complaint to include additional facts showing the Delaware Supreme Court instigated the disciplinary proceeding against me, colluded with Defendants to prejudice my case, concealed evidence and witnesses, while denying by ignoring my motions to perform discovery. I also included additional claims procedural due process violations, denial to access to the law library and other disparate treatment by the Delaware Courts made in bad faith, which occurred during the Delaware Disciplinary proceeding as distinguished from Kelly v Trump. I sought nominal damages, damages and additional equitable relief, including but not limited to voiding the Delaware Disciplinary proceeding and Kelly v Trump due to procedural due process violations which shock the conscience. I moved to add the Delaware Supreme Court as a party. (DI 43, 58-60, 69-75, 77, 80-82, 85)

I include and restate and incorporate by reference *Respondent's reply to ODC's Corrected Response to Respondent's Objections my to the Report and Recommendation of the Board on Professional Responsibility, dated June 7, 2022,* and all documents referred therein and incorporated thereto. (DI-77,) I include, restate and incorporate by this reference my Objections to the Report, the exhibits referred therein, and the Memorandum of Law ("MOL,"), and all arguments and points made in each and every one of these documents, filed on May 21, 2022, are restated in this reply. (DI. 69-75) ("Objxn" and "-" or "-Ex-" for specific exhibits therein) (DI 69-72, 75).

Per the Court's Order dated October 18, 2022, my brief is due before October 26, 2022, should my extension be denied. (3D-94-97). This Court kindly held I may proceed on the

original record in this Court reducing the need to file a complete appendix. (3D-24) This Court also kindly held, "Appellant need not conform to structure of a formal brief and may submit one principal brief not to exceed 45 pages." (3D-67) I thank this Court for its generosity.

On October 20, 2022, I called my Third Circuit case manager because I discovered the Brief was due in less than a week. (3DI-94) She recommended I file for an extension of time to draft the brief. I filed a motion for an extension to draft the brief that same day. (3DI-95)

Admittedly, I believed the case was stayed pending the Delaware District Court's determination on my latest motion to amend the orders of the District Court and alter the facts under Rule 60, and a Second Motion for a stay I incorporate herein by reference. (DI 95-96)

Early morning on Friday, October 21, 2022, I called my case manager because I was concerned about typos in the Motion for an extension to file. I rushed in an attempt to file before closing time on Thursday, October 20, 2022. She indicated I need not amend the Motion.

Due to the emergency situation, and my reliance on my case manager's suggestion to file a motion to extend for time, I called back around 3:00 PM. (3DI-96) I was concerned about relying on the extension. I sought a confirmation that I may file after October 25, 2022. She asked how much time I required. I indicated I asked for 30 days or an amount of time the Court deems just in my motion. My case manager indicated I could get back to the Court on Monday, October 24, 2022. Monday is the due date.

To my horror, I looked at the PDF of my motion. My request in the amount of 30 days is missing. So, I filed a corrected motion to eliminate typos and to ask for a specific amount of days, 30 days I mistakenly thought I included, but must have only indicated in the system. I incorporate herein by reference my Motion and corrected motion, letter and exhibits thereto,

herein. (3DI 95-96). The PACER system indicates "until/for A time this court deems just and fair. I can ask for 30 days, but I am going to start working on it now, in hopes to file it asap." ECF. [21-3198, 22-2079] (MMK) [Entered: 10/20/2022 05:04 PM]

I do not want to risk eliminating my right to access to the courts to prevent irreparable injury in the form of the Defendants infringement upon my free exercise of religious-political belief, exercise, speech and association. Nor do I desire to lose my property interest in my Delaware license to practice law. A lawyer's right, my right to pursue my profession constitutes a property protected by the due process clause of the Fourteenth Amendment, and of which I cannot be deprived for any whimsical, capricious or unreasonable cause, including the state's disagreement with my religious-political beliefs contained in speech in religious-political petitions. So, I write with haste. Rights imperfectly asserted under the duress of days to file, are better than waiving rights for failure to file.

I also preserve issues relating to the Third Circuit's Orders and conduct, done to chill or punish my exercise of my right to petition in defense of my first amendment rights I preserve for appeal. I am concerned that my case manager may have misled me to my detriment to eliminate the case by encouraging me to file a motion for an extension of time only to deny it by failing to present it to the Clerk or the Court until the due date. On October 20, 2022, I pointed to the rule that allows 7 days to fix delinquencies in filing a brief to safeguard procedural due process by providing notice and opportunity to correct errors. See, 3d Cir. L.A.R. 107.2(b). I argue, 7 days is not enough to protect my meaningful opportunity to be heard and procedural due process rights under the 5th Amendment applicable to this Federal Court, under the facts of my case. My case manager indicated I could file a motion for additional time. I am not so sure the clerk would grant additional time in light of my last conversation. (3DI-96).

In my motion and corrected motion for an extension of time I indicate the importance of having people as opposed to automation to correct filing errors by the Court. I believe Court staff and judges will be reduced in number to be eliminated as schemed by participants in the World government summit and World economic forum by automation of standardized professions, including the practice of law. (3DI-95-96) I also pointed to other filing errors by other courts. Id. Errors are not the problem. Failure to correct them or retaliation against those who point them out or make them, is the problem. The Disciplinary case was brought in retaliation against me for asking the Court to correct government violations of my Constitutional right to freely exercise my religious-political beliefs, religious-political beliefs, speech, association, by exercising my right to petition to safeguard these rights from government infringement. On the record I point to retaliation by the courts, including yet not limited to the Delaware Supreme Court to correct its own or its agent or the government's agent as a problem. The retaliation discourages citizens, including me, from exercising their right to access to the courts to petition the courts to correct the Court's own errors or violations of law or errors by its arms or agents. This is one reason for this case. (DI. 2-4, 43, See, attached Dec 11, 2020 letter)

I also note, the Third Circuit Court chilled my meaningful access to the courts by discouraging me from contacting the Court more than once a day in an Order in retaliation for my motions to correct the Third Circuit's record to prevent irreparable prejudice against me. The Court also discouraged me from correcting motions, as other lawyers do in the common course of filing pleadings, especially in emergencies. The Third Circuit threatened me with sanctions which violate my religious beliefs in Jesus against debt. (3DI-90). During that time, my case manager was out on the civil rights case, and my case manager was out on the other case before the Third Circuit.

I note with prejudice that the Third Circuit's Order I sought reconsideration from is based on a false assumption, a misleading statement, that appears to be made in bad faith to cover up the Court's error that I filed an emergency motion when the record shows I mailed in the documents I sought to remove from the record. (3-DI 86-90). There is proof of postage. (3DI 87-10-11) I incorporate by reference my petitions to correct the filings, and related motions including but not limited to (3DI 87-88).

This is unacceptable. The courts are not above the Constitution. The Courts' goal is not to safeguard its mere appearance of justice by compromising actual justice which guarantees injustice. The Courts are not a business. Judges should not be concerned with their appearance or their self-serving desire to market their value or legitimacy, which eliminates impartiality by making the court's focus on fickle fads, and pleasing the mob, and doing what serves their seats instead of doing what is right, impartially under Constitutional law.

I desire to safeguard the integrity of the Courts by requiring they do not sacrifice people, and their individual exercise of their Constitutional rights, as the Defendants seek to sacrifice me for the exercise of my rights. I seek to preserve the integrity of the courts not destroy them. I do not seek to destroy this Court or the Delaware Chancery Court or the Delaware Supreme Court, but I do seek to hold them to the letter of the Constitutional law. If I am disparately treated in bad faith to fix the outcome or to throw out my case in various forums for the mere convenience of the court, or with malice and disdain towards me for my religious-political beliefs, speech, association or petitions, than others also may be unlawfully chilled by the Courts from exercising their right to access to the courts in defense of fundamental rights. (DI 2-4) Such precedent in my case creates a danger to the public to serve mere business greed, profit, power and position, not good by respecting all without disparate treatment based on income or belief. I object to

misleading statements noted on the Third Circuit's record made with intent to chill my exercise of the right to petition, even to petition to make corrections, in defense of my fundamental rights, or to prejudice my appeal. (3DI-77-90)

The Delaware Supreme Court placed my license on inactive, disabled on August 11, 2022, and denied my motion for rehearing on multiple issues.

The State proceeding has concluded. The District Court did not analyze any of the substance of my complaints or motions, and has abstained under Younger. So, this Court's review is limited as to whether Younger applies at this time, not the merits of my complaint and motions.

Younger does not require abstention to my case. There is no state case to abstain from. The state case has concluded. There is no bar. Even if there was a case: 1. Younger does not apply to my claims for damages. The Court erred by dismissing instead of staying the case 2. Younger does not apply to federal constitutional claims in the or ancillary claims I had no opportunity to assert on the state forum. For example, 42 U.S.C.A. §§§ 1983, 1985, 1988 3. Bad faith, harassment, or extraordinary circumstances have arisen in my case that make abstention inappropriate 4.The Court erred in denying my motion to amend the complaint to include procedural and substantive due process violations, equal protections violations, and other conduct and claims that required I add the Delaware Supreme Court and the members to my complaint on January 24, 2022. (DI 43) I should be granted leave to amend the complaint, to correct any defects or arguments relating to a Younger dismissal to prevent manifest injustice that shocks the conscience in terms of loss of fundamental rights, and government punishment for the exercise of my rights, including the right to petition. 5. The new and additional facts and arguments contained in my motions and pleadings must be considered to prevent abuse of

discretion, clear error of law, clear error of fact and to prevent manifest injustice against me by denying me the opportunity to be heard to safeguard my exercise of First Amendment rights, creating loss of First Amendment rights and my interest in my ability to work in my profession

I respectfully request this Court vacate the District-Order, and remand the case back to the Delaware District Court for review.

I. THE COURT ERRED IN RULING THAT THE YOUNGER ABSTENTION REQUIRED DISMISSAL, BUT REGARDLESS THE CASE IN DELAWARE IS OVER, YOUNGER DOES NOT BAR MY CASE FROM PROCEEDING

The District Court erred in ruling that the Younger abstention required dismissal. Regardless of the error, the issue is moot because the state disciplinary proceeding has concluded.

The District Court need not abstain under Younger since the Delaware Supreme Court's case is over. The District Court should stay the case, pending my intended appeal to the US Supreme Court.

The Third Circuit explained, "Younger abstention … applies when certain types of state proceedings are ongoing at the time a federal case is commenced" *PDX N., Inc. v. Comm'r N.J. Dep't of Labor & Workforce Dev.*, 978 F.3d 871, 882 (3d Cir. 2020). The case before the Delaware Supreme Court is not ongoing. The Delaware Supreme Court made this clear by ordering "the Clerk of the Court is directed to refuse any further filings from Kelly in this matter." In re Kelly, No. 58, at *3 (Del. Sep. 7, 2022)

Younger does not apply. The state proceeding is over. This case may continue and I request the Third Circuit to please remand the case to the Delaware District Court. I note, the District Court made no analysis on the facts or law beyond denying my case under Younger. I

pray the District Court grants a stay until the conclusion of my appeal to the US Supreme Court. So, I can focus on the appeal which may prevent duplication of work, narrowing of the issues, and possible elimination of claims to prevent needless waste of resources for the parties and the Court.

II THE COURT ERRED IN APPLYING YOUNGER BECAUSE I ASKED FOR DAMAGES AND RELIEF UNAVAILABLE IN THE STATE FORUM. THE COURT SHOULD HAVE STAYED, NOT DISMISSED THE CASE

Th District Court erred as a matter of law by relying on the Younger abstention doctrine, and in dismissing my complaint and motions. The District Court based its decision on mistakes of fact. It would be an abuse of discretion, creating manifest injustice to dismiss my case.

This court's reliance on an abrogated case, *Middlesex* in its Orders is also misplaced. *Middlesex* merely related to procedural due process concerns relating to lapse of time, as distinguished from my case. *Middlesex Cnty. Ethics Comm. v. Garden State Bar Ass'n*, 457 U.S. 423, (1982); *Abrogation Recognized by Harmon v. Department of Finance*, 3rd Cir.(Del.), April 27, 2020; *Citing, Sprint Communications, Inc. v. Jacobs, 571 U.S. 69*,(2013), *Malhan v. Sec'y U.S. Dep't of State*, 938 F.3d 453, 462 (3d Cir. 2019).

In my case, I was denied a fair, impartial forum and a reasonable opportunity to be heard. The State's prosecution against me, as a party of one with individual-religious-political beliefs, for my exercise of genuinely held religious-beliefs, religious-political speech, religious-political-association, and the right to petition the courts when I believe there has been a grievance against me by a government agent, no matter my poverty, religious beliefs, or political orientation, violates my First Amendment rights and equal protections of the law.

The District-Court in its November 2, 2021 Memorandum, whether misleadingly or inadvertently, referred to Defendant's August 23, 2021 letter indicating my Chancery Court

religious-political pleadings in my active case as the reason Defendants brought the state proceeding. (DI 16, DI 3, District Court Exhibit 21) However, this court omitted the letter's reference to the Delaware Supreme Court pleadings as a reason. This omission is material to my argument the Delaware Supreme Court (hereinafter "Court" or collectively with Defendants in the case "State"), instigated the disciplinary proceeding against me. Therefore, the Court cannot present itself as impartial. (DI 9, Exhibit 5, DI 16-17). This Court also omitted my claim for damages in all of its orders, despite the fact I pointed to my claim for damages in pleadings. (DI 16-17, 30-31, 34-35, 59-60). I acknowledge the Court allegedly replaced the complaint at DI 2, as misfiled, with the page containing the claim for damages. I requested this be published to the public. The Court may have initially overlooked my claim for damages; however, I apprised the court of my claim for damages before I discovered the filing (DI 34-35, DI 61).

This Court also omitted my motions to amend the complaint to include additional counts, to include the Delaware Supreme Court justices in their personal capacity, and to include additional relief including declaratory, injunctive, damages and nominal relief. (DI 43, 58-60). Admittedly, I sought to withdraw my Motion to Amend the Complaint at DI 43, in order to motion the Court for permission to amend the complaint, after the appeal for the state proceeding is complete or the time for appeal lapsed, as new and additional evidence continuously arose, and will likely continue to arise during this time. (DI 69-75, 77, 80-82, 85).

This Court overlooked the fact I sought damages, not merely injunctive relief, in my original complaint, and other relief unavailable in the state courts. I sought relief, including but not limited, damages and equitable relief, under 42 USC §§§ 1983, 1985 and 1988, for, *inter alias,* court members' and the State's interference in my Religious Freedom Restoration Act lawsuit ("RFRA") against former President Donald J. Trump ("Kelly v Trump"). The Court

ignored my claims for infliction of emotional distress, defamation, loss of employment opportunity and lost wages. The Court also failed to consider my arguments concerning the loss of my right to exercise First Amendment Constitutionally protected liberties, including the exercise of my religious-political petitions, religious-political beliefs, religious-political association, religious-political exercise, and religious-political petitions, and loss of my property interest in my license to practice law. (DI 2-4, 34-35-2, 61-62) Nor did this Court look at the Defendants' interference with Kelly v Trump to entice me to forgo my case. This case relates to the harm caused by the Defendants in both the disciplinary proceeding and Kelly v Trump.

In *Deakins v. Monaghan*, the Supreme Court held only that "the District Court has no discretion to dismiss rather than to stay claims for monetary relief that cannot be redressed in the state proceeding."[1] I made it clear to this Court, I pled defamation, Constitutional injury and

[1] Citing, *Deakins v. Monaghan*, 484 U.S. 193, 108 S. Ct. 523, 98 L. Ed. 2d 529 (1988) "Federal district court must stay rather than dismiss claims that are not cognizable in parallel state proceeding." *Deakins v. Monaghan*, 484 U.S. 193, 202, 108 S. Ct. 523, 529–30, 98 L. Ed. 2d 529 (1988) "In reversing the District Court's dismissal of the claims for damages and attorney's fees, the Court of Appeals applied the Third Circuit rule that requires a District Court to stay rather than dismiss claims that are not cognizable in the parallel state proceeding."); *See also, Brindley v. McCullen*, 61 F.3d 507 (6th Cir. 1995); See also *Quackenbush v. Allstate Ins. Co.*, 517 U.S. 706, 719 (1996) ("we have applied abstention principles to actions 'at law' only to permit a federal court to enter a stay order that postpones adjudication of the dispute, not to dismiss the federal suit altogether."); *Lewis v. Beddingfield*, 20 F.3d 123, 124 (5th Cir. 1994). (It was proper to stay rather than dismiss the federal suit because the damages could not be claimed in the criminal prosecution.); *Jones v. Prescott*, 702 Fed. Appx. 205, 209 (5th Cir. 2017) (Younger abstention does not apply to federal suits seeking only money damages) (citing *Alexander v. Ieyoub*, 62 F.3d 709, 713 (5th Cir. 1993)); See also, *Boyd v. Farrin*, 575 Fed. Appx. 517 (5th Cir. 2014); **Third Circuit**: *Abbott v. Mette*, No. 20-CV-131-RGA, 2021 WL 1168958, at *4 (D. Del. Mar. 26, 2021), aff'd, No. 21-1804, 2021 WL 5906146 (3d Cir. Dec. 14, 2021) (A court "has no discretion to dismiss rather than to stay claims for monetary relief that cannot be redressed in the state proceeding."); *Abbott v. Mett*e, No. CV 20-131-RGA, 2021 WL 327375, at *3 (D. Del. Jan. 31, 2021), report and recommendation adopted, No. 20-CV-131-RGA, 2021 WL 1168958 (D. Del. Mar. 26, 2021), aff'd, No. 21-1804, 2021 WL 5906146 (3d Cir. Dec. 14, 2021) ("As a general matter, assuming that a federal court has jurisdiction over a case, the federal court's "obligation to hear and decide [the] case is virtually unflagging." *Sprint Commc'ns, Inc. v. Jacobs*, 571 U.S. 69, 77 (2013) (internal quotation marks and citation omitted);*Crane v. Fauver*,

emotional distress, by pleading damages, albeit unartfully in my original Complaint. (DI 2, 34-35). In addition, I showed my intent to seek nominal damages, damages, and equitable relief too. (D.I. 43, 58, 69-75, 77-79). My claims for damages were unavailable in state court.

A court "has no discretion to dismiss rather than to stay claims for monetary relief that cannot be redressed in the state proceeding." *Citing, Abbott v. Mette,* No. 20-CV-131-RGA, 2021 WL 1168958, at *4 (D. Del. Mar. 26, 2021), aff'd, No. 21-1804, 2021 WL 5906146 (3d Cir. Dec.

762 F.2d 325 (3d Cir. 1985) ("District court should have retained jurisdiction over correctional officers' civil rights action arising out of their discharge, even if it properly declined to exercise jurisdiction over federal claims, and stayed action pending outcome of related state proceeding where officers were relegated for prudential reasons to state proceeding which could only afford them dismissal of charges and back pay, with attorney fees only to extent that back pay award was reduced by interim earnings, but officers sought constitutional damages and attorney fees, and new complaint upon termination of state proceedings may have been time-barred."); *Williams v. Hepting*, 844 F.2d 138, 145 (3d Cir. 1988) (The Third Circuit held, "Accordingly, we hold that the district court should have stayed instead of dismissed without prejudice Williams' failure-to-investigate and suggestive pretrial identification claims. Because these particular federal court claims for damages seek relief that is unavailable in Williams' ongoing state proceedings, the allegations should be stayed pending the outcome of his state court appeal on the underlying conviction."); *Nimer v. Lichfield Twp. Bd. of Trustees,* 707 F.3d 699 (6th Cir. 2013) *(Younger* abstention applies to § 1983 damages claims, but district court must stay rather than dismiss federal suit; in other words district court has no discretion to dismiss federal suit); *Carroll v. City of Mount Clemens,* 139 F.3d 1072 (6th Cir. 1998) (when federal suit seeks damages and *Younger* is invoked, federal suit should be stayed, not dismissed; this likely will be a formality, given probable preclusive effect of state court decision); *Watkins v. Ohio Dep't of Educ*., No. 2:21-CV-04482, 2022 WL 672565, at *8 (S.D. Ohio Mar. 7, 2022)(" Further, when a plaintiff seeks both equitable and legal relief, many courts in the Sixth Circuit stay the entire case rather than treat each form of requested relief differently."); *Maraan v. Off. of Ohio Disciplinary Couns. for Supreme Ct. of Ohio,* No. 1:18CV645, 2021 WL 3173311, at *3 (S.D. Ohio July 27, 2021) (Court "stayed until the conclusion of the state disciplinary proceedings, rather than be dismissed."), *citing, Kalniz,* 699 F. Supp. 2d at 975 (explaining that where a plaintiff is bringing constitutional civil rights claims in a federal court case in which *Younger* abstention was proper, the stay protects against the possibility that the statute of limitations could deprived the plaintiff of the opportunity to present the merits of her damages claims); see also *Meyers v. Franklin Cty. Court of Common Pleas*, 23 F. App'x 201, 206 (6th Cir. 2001) (and cases cited therein); *Yamaha Motor Corp. v. Stroud,* 179 F.3d 598 (8th Cir. 1999) (when damages are sought in § 1983 action subject to *Younger* abstention, and damages are not available in pending state proceeding, federal action should be stayed, not dismissed); *Night Clubs, Inc. v. City of Fort Smith*, 163 F.3d 475 (8th Cir. 1998) (when § 1983 complaint seeking damages is subject to *Younger* abstention, federal action should be stayed rather than dismissed).

14, 2021); *See, Watkins v. Ohio Dep't of Educ.*, No. 2:21-CV-04482, 2022 WL 672565, at *1 (S.D. Ohio Mar. 7, 2022).

Abstention is not appropriate, staying the action was required. *See, Meyers v. Franklin Cty. Court of Common Pleas*, 23 F. App'x 201, 206 (6th Cir. 2001); *Maraan v. Off. of Ohio Disciplinary Couns. for Supreme Ct. of Ohio*, No. 1:18CV645, 2021 WL 3173311, at *3 (S.D. Ohio July 27, 2021); *Watkins v. Ohio Dep't of Educ.*, No. 2:21-CV-04482, 2022 WL 672565, at *8 (S.D. Ohio Mar. 7, 2022); ("Further, when a plaintiff seeks both equitable and legal relief, many courts in the Sixth Circuit stay the entire case rather than treat each form of requested relief differently.").

The Delaware District Court abused its discretion by dismissing as opposed to staying the proceeding and denying all motions as moot with its dismissal.

The Younger abstention does not apply to additional claims I included for money damages for First Amendment violations, loss of employment opportunity, emotional distress, and loss to reputation. (DI 2, 3, 4).

III. YOUNGER DOES NOT APPLY TO MY FEDERAL CONSTITUTIONAL CLAIMS OR ANCILLARY CLAIMS I HAD NO OPPORTUNITY TO RAISE IN THE STATE COURT

I had no adequate opportunity to raise my federal claims or ancillary claims for damages and nominal relief in state court. (DI 2 and DI 43). I asserted Constitutional defenses. Nevertheless, the state court precluded my meaningful opportunity to be heard on my defenses and motions, prevented discovery, denied me the opportunity to call witnesses, denied me access to the law library, sealed pleadings to conceal evidence, and fired two witnesses to prevent their testimony in my favor to prejudice the proceeding against me. (DI 55, 70-75, 77)

I moved the Court to amend the complaint to include the Delaware Supreme Court as a party, for additional relief, including but not limited to, additional equal protection violations, and additional procedural and due process claims. I also seek to void *Kelly v Trump* and the disciplinary matter. I also requested other equitable relief, and nominal damages. I also sought to amend the name of a Defendant, and other matters I include herein by reference to the docket item numbers.[2] (DI 43-44, 55-56, 58, 69-75, 81-82, 85).

The state court does not have subject matter jurisdiction or jurisdiction is voidable. The Younger abstention is not appropriate to enjoin a forum without subject matter jurisdiction. The Delaware Supreme Court is without jurisdiction for its violations of procedural and substantive due process. Its judgments must be deemed void. (*See, May v. Anderson*, 345 U.S. 528, 537 (1953) "It is void … if it denies due process of law."); (*Pease v. Rathbun-Jones Eng. Co.*, 243 U.S. 273, 276 (1917) Judgments " are void for lack of due process of law, or should be set aside for error."). The state-court does not have subject matter jurisdiction or jurisdiction is voidable. The Younger abstention is not appropriate to enjoin a forum without subject matter jurisdiction. The Delaware Supreme Court is without jurisdiction to rule on its own alleged violations of procedural and substantive due process, violations of First Amendment rights, conspiracy and collusion under 1985, or whether it had subject matter jurisdiction. Its judgments in Kelly v Trump and in the disciplinary cases may only be deemed void by the Federal District Court, not the state court.

[2] *Constr. Drilling, Inc. V. Chusid*, No. 03-3786, 2005 WL 1111760, at *3 (3d Cir. May 11, 2005) (The Third Circuit held, "A judgment may also be void if a court "acted in a manner inconsistent with due process of law."); See Respondent's Exhibits to the Hearing ("R-Ex") Exhibits 35, 37 Part 2, 42, R 44

I had no adequate opportunity to raise my federal claims in state court. I asserted Constitutional defenses. Nevertheless, the state court precluded my meaningful opportunity to be heard on my defenses and motions, prevented discovery, denied me the opportunity to call witnesses, denied me access to the law library, sealed pleadings to conceal evidence, and fired two witnesses to prevent their testimony in my favor to prejudice the proceeding against me. (DI 55, 70-75, 77)

There was no opportunity to ask the Delaware Supreme Court to void its own decision in Kelly v Trump and the disciplinary matter or to seek equitable relief, money damages or nominal damages against itself and its agents and arms. I seek to sue the Delaware Supreme Court. They cannot decide the case against itself, because they are a defendant. The Delaware Supreme Court is partial to the state and itself. I am entitled to an impartial judge, in accordance with the 1st and 14th Amendment procedural and substantive Due Process protections.[3]

State procedural law barred presentation of my Constitutional claims.

I will face irreparable injury in terms of loss of First Amendment rights and my property interest in my license should this Court deny me of the opportunity to be heard.

A lawyer's right, my right to pursue my profession constitutes a property protected by the due process clause of the Fourteenth Amendment, and of which I cannot be deprived for any

[3] US Const. Amend I, V. (See, *Schweiker v. McClure*, 456 U.S. 188 (1982) reversed on other grounds; *Gibson v. Berryhill*, 411 U.S. 564, 570 (1973); *Ward v Village of Monroeville*, 409 US 57 61-62 (1972) ("Petitioner is entitled to a neutral and detached judge in the first instance."); *In Re Murchinson*, 349 US 133, 136 (1955); *Tumey v State of Ohio*, 273 US 510 (1927); *Withrow v. Larkin*, 421 U.S. 35, 46 (1975); *McCool v. Gehret*, 657 A.2d 269, 277 and 280 (Del. 1995) (" excluding evidence [in my case emails] of efforts to influence a witness' testimony [to exclude evidence] constitutes reversible error. …."Opinion testimony by a judge creates the appearance of partiality on behalf of a litigant, is greatly prejudicial to the adverse party…"); *Inc. v. Lopez*, CIV. No. 14-1223 (PG) (D.P.R. Oct. 27, 2015); *United Church of the Medical Center v. Medical Center Comm'n*, 689 F.2d 693, 701 (7th Cir. 1982); *Utica Packing Co. v. Block*, 781 F.2d 71, 77 (6th Cir. 1986); *Hammond v. Baldwin*, 866 F.2d 172, 177 (6th Cir. 1989).

whimsical, capricious or unreasonable cause, including the state's disagreement with my religious-political beliefs, outlined in Kelly v Trump. The Defendants point to my religious beliefs and citations to the Bible in their petition at 7 which are relevant to my claims in Kelly v Trump, and my Religious Freedom Restoration Act, religious-political pleadings in their Aug. 23, 2021 letter, as the reason for the disciplinary proceeding against me. (DI 56, 56-1, 56-2)

In *Brindley v. McCullen*, 61 F.3d 507, 509, the Court held in a § 1983 action for damages, the Sixth Circuit ruled that when *Younger* abstention is invoked, stay rather than dismissal is the appropriate disposition. A stay "avoids the costs of refiling, allows the plaintiffs to retain their place on the court docket, and avoids placing plaintiffs in a sometimes-difficult position of refiling their case before the statute of limitations expires." Id. In my case the statute of limitations and costs given my poverty and religious beliefs against indebtedness, prejudice me by a dismissal under Younger. The statute of limitations also prejudices my case. I have claims relating to Kelly v Trump, and retaliation for my petitions for relief from bar dues, not merely claims for the Delaware Disciplinary case, which arose during that disciplinary proceeding which has concluded. I believe my claims relating to the petition for relief from bar dues were from January and February 2020, which approaches the statute of limitations in 3 or 4 months. In light of the multiple law suits and disciplinary proceedings which have arisen as a result of the disciplinary proceeding, dismissing my law suit under Younger would likely render me without relief for my bar dues petition which the Delaware Supreme Court appeared to address in its order, August 10, 2022, indicating the need for money over justice, making liberty for sale not free. Recall information contained in the bar dues petitions show the Delaware Supreme Court incited the disciplinary proceeding against me, though additional evidence of the court's collusion arose thereafter.

I still have claims for retaliation for my right to petition based on religious-political and poverty animus. I also have claims, including but not limited to 42 USC §§§ 1983, 1985 and 1988 claims, as well as defamation, emotional distress, violations of my first amendment right of speech, belief, exercise of belief, association, speech and petition etc, relating to petitions other than the disciplinary petition. It places me in a difficult position should this case not be considered by the only court with subject matter jurisdiction to consider my claims, the Delaware District Court.

IV. BAD FAITH, HARASSMENT OR EXTRAORDINARY CIRCUMSTANCES HAVE ARISEN IN MY CASE THAT MAKE ABSTENTION INAPROPRIATE

Bad faith, harassment, or extraordinary circumstances have arisen in my case that make abstention inappropriate.

The Record shows evidence of collusion and fraud to fix the proceeding against me, including but not limited to the sealing of records material to my defense to prejudice my case, the Board and Court denying my motions to perform discovery and to call witnesses to conceal the fact they eliminated two key witnesses by terminating them from the court, denial of my procedural due process rights, compelling me to attend a hearing when I was ill getting over the shingles. (DI 58) The record is full of additional outrageous issues including denial of access to the law library, granting me permission to hand in physical pleadings only to refuse to upload them onto the electronic record to conceal the ignored motions. (D.I.). The Board rendered email orders to prevent my opportunity to be heard on appeal. DI 47. The Hearing was inaccurately transcribed to prejudice me in this sham proceeding. (DI 47) Patricia Swartz lied to me about receipt of answer, which prejudiced me on costs an emotional distress. (DI 29). The record shows bad faith denials by Defendants and the State Court in response to my motions for a fair and impartial opportunity to be heard on issues other similarly situated attorneys would be

heard on. (DI 23, 34-36, 39-44, 47-58, 66, 69-75, 77-89, 95-96) There are other procedural defects that shock the conscience, but there is neither time nor space to discuss. The procedural history alone was 33 pages in my objections, I incorporate herein and do not waive due to space and time limitations. Irreparable injury exception to abstention applies, in § 1983 actions.

Circumstances give rise to irreparable injury sufficient to warrant exception to Younger abstention are extraordinary in the sense of creating an extraordinarily pressing need for immediate federal equitable relief, not merely in the sense of presenting a highly unusual factual situation. If I am being persecuted for believing differently, than other professionals who think differently than the state or its government backed private or foreign partners are in danger of being labeled the derogatory term disabled to demean their word before the public, while making it difficult to buy and sell as a professional.

The State Courts, the Chancery and Delaware Supreme Courts are without jurisdiction to grant relief beyond enjoining the state case since their members or agents incited the retaliatory behavior against me in bad faith to fix the sham proceeding against me to protect the mere appearance of the Courts while committing grave injustice that shocks the conscience. They cannot void their own decisions by the dictates of their desires instead of my appeal or by a lawsuit in federal court voiding their decision or holding they did not have subject matter due to procedural due process or equal protections violations. I am not aware of any cases which make orders voidable on equal protections grounds, but I reserve this argument for appeal too. It is prudent to protect individual liberty of minorities and others who do not think or believe the same as the majority or by the dictates of money. It makes us smarter to encourage diverse thought, and free not controlled to conformed dreaded dumbed down standardization.

The Delaware Supreme Court and Board ("Defendants") clearly violated Equal Protections rights based on poverty-animus and political-religious animus, towards me as a party of one on disdain for my religious-political petitions, defending and safeguarding my religious-political beliefs, speech and association. beliefs, religious-political speech, religious-political association my substantive and procedural due process rights, and disparately treated me, by punishing me for my poverty, religious practice and religious speech pursuant to treatment that is not neutral or generally applicable. US Const Amend. I, IV. I argue the case is voidable not only for substantive and procedural due process violations including but not limited to denying me notice pursuant to the rules, an opportunity to be heard, meaningful opportunity to prepare and present my case before an impartial forum, an opportunity to call witnesses and to expect the Court before whom I present my case has not actively concealed evidence and witnesses to fix the proceeding against me, but also for the Court and the state's and Defendants Equal protection violations brought with poverty animus, and political-religious animus. Nevertheless, this is not ripe for consideration until heard below. I fight now for the mere opportunity to be heard, the opportunity for justice, not the guarantee.

I do not have an adequate opportunity to raise my federal claims in state Court, including these claims. The state courts favor the Defendants, and favor their own agents. The Court cannot make a determination for relief against itself as a party.

V. THE COURT ABUSED ITS DISCRETION BY DENYING LEAVE TO AMEND THE COMPLAINT, WHILE APPLYING THE YOUNGER ABSTENTION

On January 24, 2022, I filed a Motion to amend the complaint showing I must join the Delaware Supreme Court and request for relief, I did not know was needed until that time, showing bad faith, fraud or collusion. The State Forum had no ability to hear my claims and additional claims fairly. (DI 43). The District-Court denied by failing to address it when it

rendered its order on April 26, 2022. The District Court sat on it for four months which is an abuse of discretion, an error by failing to consider material facts, amending the facts to include the additional facts, which causes manifest injustice against me, in terms of the loss of my fundamental rights, emotional distress, loss of property interests in my licenses to practice law and other harm. (DI 43)

The District Court appeared to fail to consider facts and legal arguments or exhibits contained in my motions to amend and alter the complaint. I incorporate herein in the entirety by reference, or other papers I filed I incorporate herein by reference, which are material to claims. (DI 2, 3, 4, 7, the exhibits therein, 20, 21, 21 29, 35, 36, 39, 40, 41, 43, 47, 48, 49, 51, 52, 53, 54, 55, 56, 57, 58)

Since April 24, 2022, the new and additional evidence has arisen showing the Court colluded in fixing the proceedings, including terminating two witnesses to conceal their testimony and preventing me from calling witnesses and performing discovery to find out the bad faith participation of the Delaware Supreme Court in concealing favorable testimony. Yet, the District-Court was aware of this when it rendered its order. (DI 58)

After April 24, 2022, new and additional information, facts and legal claims and damages have arisen which have not yet been considered. The District-Court must have opportunity to consider the facts and arguments to prevent manifest injustice. (DI 62, 64, 65, especially note the sealed docket items, that have since been unsealed, 66, 69, 70, 71, 72, 74, 75, 77, 78, 80-85, 88, 88, 89, 90, 91, 93, 95, 96).

I have since moved the court through rolling motions to amend the Complaint altogether once, at the conclusion of the appeal to the United States Supreme Court proceeding. Nevertheless, this is not yet ripe for review. The mere opportunity to be heard must be protected.

The Court has not issued an opinion on the facts of my case, or the additional facts after the order. I must be heard to prevent precedent that the Government is above the law, and there is no forum to be heard, and others will be punished like me for asking for relief from government incited substantial burdens upon my Constitutionally protected religious belief, religious exercise, religious speech, religious association and religious petitions concerning government incited grievances, and property interest in professional licenses. US Amends I, XIV

Leave to amend the complaint must be granted in the interest of justice since the District Court allowed the additional injuries to be had against my person in bad faith. *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009). If my motion to amend the complaint to include the Court had been permitted, the Court would not be permitted to find Younger abstained my case.

Because this District Court prevented service of the Complaint, I must be permitted fair opportunity to amend the Complaint after my appeal to the US Supreme Court to prevent manifest injustice against me, pursuant to Fed. R. Civ. P. 15 (a), and under other provisions of Fed. R. Civ. P. 15. I have a right to "amend without leave where no answer has been filed." *Citing, De La Cruz-Saddul v. Wayne State University,* E.D.Mich.1980, 482 F.Supp. 1388.

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Quattlebaum, D.D.C.2004, 219 F.R.D. 195 "Plaintiff enjoys absolute right to amend complaint once at any time prior to responsive pleading or granting of motion to dismiss.")

"Leave to file an amended complaint is not required, since defendant had not yet answered," and has not even been served yet. *Cunard Line Ltd. v. Abney,* S.D.N.Y.1982, 540 F.Supp. 657.

I think it prudent to serve an amended complaint as opposed to an original, and provide my intent to file an amended complaint at a later time, all at once at the conclusion of my appeal of the Delaware disciplinary matter to the US Supreme Court. (*See, Datastorm Technologies, Inc. v. Excalibur Communications, Inc., N.D.Cal.1995*, 888 F.Supp. 112, "Complaint that has been amended pursuant to rule governing motions to amend suspends pleading it modifies, rendering original pleading void.")

Defendants should reasonably expect, I would seek relief from this court for such irreparable injuries I suffer as a result of the Court failing to enjoin the disciplinary proceeding, and additional prospective relief to prevent new irreparable harm by amending my complaint to include the same. (DI 2-4, 7-10). I have no adequate opportunity to raise my federal claims in the state proceeding.

Defendants have notice, I will seek relief from this court for the irreparable harm I sought to prevent, including but not limited to, irreparable injury, as a loss to protections of my fundamental rights, harm towards my person, economic harm, by preventing me from seeking to rejoin my former law firm, my active license to practice law, my reputation, my health, the shingles, punishment for the exercise of my right to petition, in interference with my right to a fair trial in *Kelly v Trump*, interference with my right to a fair trial in the disciplinary matter which was unlawfully brought to punish me for the exercise of fundamental rights, my loss of and punishment

for the exercise of the right to a fair trial, to religious-political belief, religious-political association, religious-political speech, and the right to make religious-political petitions when I believe the government has committed a grievance against me, and procedural and substantive due process rights applicable to the Defendants pursuant to the 1st and 14th Amendments, Vindictive prosecution, selective prosecution and, or other claims.

On April 26, 2022, I filed a letter indicating my desire to amend the complaint again by stating. "With new and additional information commonly arising in my case, I have a running request to amend the complaint to conform with additional and new evidence, as they arise at the end of proceeding, to include additional or new claims or evidence." (D.I. 58 at page 14)

On May 7, 2022, I filed *Plaintiff's Addendum May 7, 2022, Critical documents unavailable to conceal court misconduct attached hereto to be included in DI-4; State Court sealing of documents in Kelly v Trump, correct and supplement the record at D.I. 4,* ("May 7th Motion"), *wherein,* I provided evidence the Delaware Supreme Court sealed my petitions, material to my defense in the disciplinary proceeding, without providing me notice or an opportunity to be heard to prejudice the case against me in the sham disciplinary proceeding. (D.I. 65, D.I. 65-2, D.I. 65-4).

I also alerted the court to my religious objection to swearing or affirming in the May 7th Motion. (D.I. 65, paragraphs 17-22.); (Also see, D.I. 77-2).

Since, it became clear my complaint, as filed, did not appear accurate to the public, I filed *Appellant Plaintiff Meghan Kelly's Motion Directing the Delaware District Court to correct the Complaint to include the signature and listed damages for relief so as not to mislead the public, attorneys and appellate Courts,* to confirm my filing includes the claim for damages in the original complaint. (DI 61).

On May 24, 2022, I filed a more formal motion, *Plaintiff's Rolling Motion to conform complaint to the additional facts and legal arguments as they arise, as if already included in the Complaint.* (DI 69-75).

On June 7, 2022, I filed *Plaintiff's Motion to include pleadings filed on June 7, 2022, for the Court's consideration pursuant to her rolling motion to conform the complaint to additional facts alleged and arguments as they arise, as if already included in the complain*t. (D.I. 77)

There is a continuous need to amend the complaint, and I prefer to make a request leave be granted at the conclusion of my appeal to the US Supreme Court on the state disciplinary proceeding, as a matter of right, including appeals, or the time of appeal has lapsed. It appears additional facts, harm, and claims of relief will arise until the conclusion of the State proceeding, causing additional amendments to the complaint.

The Chancery Court revealed I cannot file for a mistrial, since the Court intentionally drafted a rule requiring, I violate my religious beliefs against swearing in order to prevent me from seeking a mistrial in Kelly v Trump, showing an unfair proceeding is guaranteed. (D.I. 77-2), See paragraph 36 above. This same rule prevents me from contesting the adjudication of disability by the Delaware Supreme Court before the Chancery Court. Id.

In the interest of justice, I must not be denied permission to file a motion to amend the complaint to include the Delaware Supreme Court in addition to each of the members as outlined in DI 43, as Defendants. I must petition this court to declare *Kelly v Trump* void, and seek to enjoin the justices and the courts from enforcing their decision, because of the Delaware Supreme court's participation in denying my procedural and substantive due process rights in violation of

the First Amendment to fix the outcome, not only in the disciplinary proceeding, but also in *Kelly v Trump*.[4]

A judgment may be void if a court "acted in a manner inconsistent with due process of law." *Constr. Drilling, Inc. v. Chusid*, 131 F. App'x 366, 372 (3d Cir. 2005); *citing,* 1 C*hrles Alan Wright, Arthur R. Miller & Mary Kay Kane, Federal Practice and Procedure* § 2862.[5] "While 60(b)(4) motions are ordinarily raised in the court that rendered the decision, they can be raised elsewhere." Id. Accordingly, I must be permitted the opportunity to plead to void *Kelly v Trump* based on absence of subject matter jurisdiction or voidable subject matter jurisdiction for the court's incitement and participation in prosecuting me for my religious beliefs and speech, contained in my petitions. In addition, I should not be denied the opportunity to request relief for the state's interference and attacks against me during my live religious-political RFRA case, *Kelly v Trump*, to cause me to forgo constitutional rights and to affect the outcome. *See, Kennedy v. Bremerton Sch. Dist*., 142 S. Ct. 2407 (2022) ("The Free Exercise and Free Speech Clauses of the First Amendment work in tandem: where the Free Exercise Clause protects religious exercises, whether communicative or not, the Free Speech Clause provides overlapping protection for expressive religious activities.")

[4] *Velasquez v. Litz*, No. CV 3:21-1659, 2021 WL 5298912, at *3 (M.D. Pa. Nov. 15, 2021); See *Fletcher-Harlee Corp. v. Pote Concrete Contractors, Inc*., 482 F.3d 247, 253 (3d Cir. 2007); *Abbott v. Mette*, No. 20-CV-131-RGA, 2021 WL 1168958, at *4 (D. Del. Mar. 26, 2021), aff'd, No. 21-1804, 2021 WL 5906146 (3d Cir. Dec. 14, 2021); *Harris v. Raymond*, No. 3:20-CV-01119, 2020 WL 5267920, at *4 (M.D. Pa. Aug. 17, 2020), report and recommendation adopted, No. 3:20-CV-1119, 2020 WL 5260769 (M.D. Pa. Sept. 3, 2020)

[5] *Bush v. Rauch*, 38 F.3d 842, 847 (6th Cir. 1994)(I argue the state's decisions are void, without jurisdiction exercised, outside of the scope of judicial function, in clear absence of all jurisdiction since the Delaware Supreme Court incited the state arms to attack me to fix the outcome in both Kelly v Trump, and the disciplinary matter.)

In Lucero v. Ramirez, No. 20-CV-2411-CAB-JLB, 2021 WL 1529932, at *1 (S.D. Cal. Apr. 16, 2021), the Court held, "An attorney charged with misconduct is entitled to receive reasonable notice, to conduct discovery, to have a reasonable opportunity to defend against the charge by the introduction of evidence, to be represented by counsel, and to examine and cross-examine witnesses." I was denied these rights in the disciplinary proceeding too. The Delaware Supreme Court concealed the elimination of the witnesses, material pleadings, and colluded with the Defendants to obstruct my access to material witnesses in the disciplinary proceeding.

I have a "right to be tried by an unbiased and impartial judge without a direct personal interest in the outcome of the hearing [as prosecutor or witness]." *Ungar v. Sarafite*, 376 U.S. 575, 584 , *Citing, Tumey v. Ohio*, 273 U.S. 510.

Per the US Supreme Court in *Peters v. Kiff,* 407 U.S. 493, 502 (1972), *Overruled in Gregg v. Georgia*, 428 U.S. 153, 169 (1976), on other grounds,

> "[E]ven if there is no showing of actual bias in the tribunal, [the US Supreme Court] has held that due process is denied by circumstances that create the likelihood or the appearance of bias. This rule, too, was well established long before the right to jury trial was made applicable in state trials, and does not depend on it. Thus, it has been invoked in trials to a judge, e. g., *Tumey v. Ohio*, 273 U.S. 510 (1927*); In re Murchison*, 349 U.S. 133 (1955); *Mayberry v. Pennsylvania*, 400 U.S. 455 (1971)

The Delaware Supreme Court, would have correctly kicked the case out, in *Kelly v Trump*, for my failure to serve US Attorney General. They expressly did not. (DI 4, 79-3) Instead, the court stated my legal arguments against executive orders that permitted money be given to churches, under the deception of charity, to perform government business was lawful. In addition, the members of the Delaware Supreme Court incited the Supreme Court's arms to attack me during proceeding, *Kelly v Trump*, to interfere with, and affect the outcome of my case.

I believe people go to hell for thinking business or money, convenience, avoidance of costs, or productivity is the law, making the law for sale, not protecting free people by elimination of

Constitutional freedoms of speech, belief, exercise of belief, association, and petition. It teaches that lawlessness, spoken of by Jesus, is the law, making money and material gain guide and God. Jesus teaches those who serve money as guide and God will not have eternal life, but will be cast in the fire. I believe courts have the ability to save eternal lives by taming the sin against the holy spirit, with just decrees, to prevent businesses from killing stealing and destroying for the bottom line.

The government ignores Constitutional liberties by enslaving its own people by making money the law. No government money should be granted to any private entity, regardless as to whether it is a not for profit, charity, another government, organization like CERN, business, or a religious institution. If the government funds it, it should run it, at no cost to the people, by coining money correctly, not through the federal reserve, and without debt and interest to care for the people. Otherwise, equal protections are violated and partiality is granted to entities who may perform government business at the least amount of cost, making those with more resources in a better position of gaining more government funding. This creates wealth, favoring those who are rich, while keeping the poor impoverished, not equal protections, but favoritism towards those with connections, power or material wealth.

VI. SOME NOT ALL OF NEW FACTS AND CLAIMS, WHICH MUST IN THE INTEREST OF JUSTICE BE REMANDED TO BE CONSIDERED BY THE DISTRICT COURT, ALONG WITH MY OTHER CLAIMS

The new and additional facts and arguments contained in my motions and pleadings must be considered to prevent abuse of discretion, clear error of law, clear error of fact and to prevent manifest injustice against me by denying me the opportunity to be heard to safeguard my exercise of First Amendment rights, creating loss of First Amendment rights and my interest in my ability to work in my profession.

The hearings and actions taken by Defendants against my professional license in retaliation for my exercise of Constitutional rights are in violation of the First Amendment, the Procedural and Substantive Due Process Clause and Equal Protection Clauses of the Fourteenth Amendment. They must be rejected as by "rule of law" rather than personal vendetta for my personal-religious-political speech contained in the petitions. (US Amend I, XIV)

The State denied me of substantive and procedural due process rights in this disciplinary proceeding. The record shows clear and convincing evidence that the proceedings were brought, with religious-political animus, in retaliation against me for filing Kelly v Trump and for petitioning the court regarding bar dues to safeguard my liberties.

The state abused its discretion by 1. Vindicative prosecution, which constitutes a violation of due process, and by Selective prosecution, which constitutes a denial of equal protection.

The state courts are also without subject matter jurisdiction due to their conduct and interference with Kelly v Trump, to fix the outcome of that case and their participation in fixing the sham trial against me in the disciplinary action by violating my procedural and substantive due process rights rendering both the action voidable.

I have a right to petition the courts when I believe a transgression has been committed against me by the establishment of government religion by President Trump.

I uphold my oath by requesting government agents, judges, presidents and members of congress to adhere to rule of law by allowing me to exercise my Constitutional rights. The steps taken to orchestrate this proceeding circumvent due process protections and thereby manifest selective targeted unjust persecution.

The State Courts, the Chancery and Delaware Supreme Courts are without jurisdiction to grant relief since their members or agents incited the retaliatory behavior against me.

I did not have an adequate opportunity to raise my federal claims in state Court. The state courts favor the Defendants, and favor their own agents. The Court cannot make a determination for relief against itself as a party.

The Delaware Supreme Court and Board (also referred herein as "Defendants") clearly violated Equal Protections rights based on poverty-animus and political-religious animus, towards me as a party of one on disdain for my religious-political petitions, defending and safeguarding my religious-political beliefs, speech and association. beliefs, religious-political speech, religious-political association my substantive and procedural due process rights, and disparately treated me, by punishing me for my poverty, religious practice and religious speech pursuant to treatment that is not neutral or generally applicable. US Const Amend. I, IV.

Nothing was normal during *Kelly v Trump*. Court staff appeared to seek to sabotage my case, based on my political-religious beliefs and/or indigency, by 1. misleading me to almost miss my deadline to appeal, 2. Appearing to disparage me based on religious-political beliefs or/and poverty, 3. instructing me to write off the Attorney General's address, which impeded service, and 4. By writing on a praecipe, causing confusion, and needless pleadings.[6]

To worsen matters, the Delaware Supreme Court appeared to cause its arms to attack me to get me to forgo my lawsuit. [7] DE-Lapp's letter indicated the relief requested from the DE Supreme Court, relating to bar dues, as the source of its interference with my law suit. Id. **(DI 77**

[6] (Objxn-B-D, K-internal-exhibits-2-7, 27-29, DI 62-72.
[7] DI 62-72, Objxn-E-G, K-internal Ex-20-26-29.

Exhibit A, B, C) The Clerk of Court confirmed the entire court reviewed my petitions relating to attorney dues, evidencing the entire Court incited the interference in *Kelly v Trump*.

Further, Sussex Court of Common Pleas Judge Kenneth S. Clark, interrogated me at the arms of the court's request in public at BJ's, located in Millsboro. He demanded I come to his chambers for filing *Kelly v Trump* to obstruct, impede or cause me to forgo my lawsuit. Id.

Other parties are not threatened by Court agents wearing the cloak of government authority to obstruct, impede or cause claimants to forgo cases whose religious-political beliefs they disagree with. Minorities like myself, whose religious-political beliefs do not conform to the mainstream are still afforded Constitutional protections for exercise of fundamental rights relating to their diverse, tightly held religious-political beliefs, including speech defending such rights in petitions.[8]

I petitioned the Delaware Supreme Court concerning the disparate treatment. The Delaware supreme Court ruled my case was frivolous, and indicated my petitions relating to disparate treatment need not be addressed. The Court sealed these same petitions it indicated were not necessary to address to prejudice my case.

The Court's disagreement with my religious beliefs is an impermissible reason to deem me disabled. "Courts have no business addressing whether sincerely held religious beliefs asserted in a RFRA case, [including mine] are reasonable." *Burwell v. Hobby Lobby Stores, Inc*., 573 U.S. 682, 682. The government may not determine what is and what is not an acceptable

[8] *Obergefell v. Hodges*, 576 U.S. 644

religious belief.[9] My God is the arbiter of my life, regarding religious beliefs, not the government, even when the government deems my religious beliefs wrong or a disability.

The Court's misguided conclusion that my case is frivolous is not a permissible reason to deem me disabled. Other lawyers have their cases and their clients' cases kicked out as frivolous and they are not disciplined or deemed a danger to society. My religious-political beliefs are the ODC's admitted reason for their claim for disability and for disciplining me. (**Exhibits E, F**)

On August 23, 2021, the ODC sent me a threatening letter by email, interfering with my active case, but for my petitions, before I appealed the Delaware Supreme Court's decision to the United States Supreme Court, admitting my Delaware Supreme Court and Chancery Court religious-political pleadings, as the reason for their attack.[10] **(Exhibit E).** The ODC's attack was "unconstitutional on its face and as applied." *Hill v. City of Scranton*, 411 F.3d 118, 122 (3d Cir. 2005). Should they have any legitimate concerns, which the record shows none, the ODC should not have interfered with my First Amendment exercise of petitioning the courts, to affect the outcome or pressure me to forgo the case, in violation of US Amend I and XIV. Id. at 125-126.

On October 25, 2021, I filed a lawsuit to enjoin the ODC for retaliating against me for exercising fundamental rights, and for damages for emotional relief.[11] On November 1, 2021 the US Supreme Court denied my writ of certiorari.[12]

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[9] *Employment Div., Dept. of Human Resources of Ore. v. Smith*, 494 U. S. 872, 887, 110 S. Ct. 1595, 108 L. Ed. 2d 876 (1990). ("the First Amendment forbids civil courts from" interpreting "particular church doctrines" and determining "the importance of those doctrines to the religion.")

[10] Objxn-K-Internal-Ex-5-7.

[11] Objxn-H

[12] Objn-K-Ex-1.

On or about November 4, 2021, the date the preliminary review committee conducted a hearing, the Delaware Supreme Court sealed my Delaware Supreme Court petitions in *Kelly v Trump* relating to disparate treatment, without notice and an opportunity for me, a party to be heard, and without valid cause.

I did not have access to the sealed documents, through public record, nor did the ODC, the public, or the federal courts, which prejudiced me to the benefit of the State. [13] Third Circuit Judge Bright's, concurring in part and dissenting in part in *U.S. v. Wecht,* 484 F.3d 194, 221, 226 (3d Cir. 2007) indicated sealing documents without notice or opportunity for a party to be heard without valid reason was enough to remove a judge from a case.

In my case the Delaware Supreme Court, sua sponte, sealed documents to assist the ODC's prosecution of me by concealing relevant material to my defense, evidencing the entire court's apparent bias against me and the Court's partiality to the state.

"When a court considers the imposition of a seal, it must make particularized findings on the record, giving notice on the docket of such consideration and rejecting alternatives to closure." *U.S. v. Wecht*, 484 F.3d 194, 224 (3d Cir. 2007); See *United States v. Criden*, 675 F.2d 550, 560 (3d Cir.1982).

[13] (*N. Jersey Media Grp. Inc. v. United States*, 836 F.3d 421, 434 (3d Cir. 2016), "We have previously recognized a right of access to judicial proceedings and judicial records, and this right of access is beyond dispute." *Pansy v. Borough of Stroudsburg*, 23 F.3d 772, 780-81 (3d Cir. 1994) (internal quotation marks omitted); see also *Nixon v. Warner Commc'ns, Inc*., 435 U.S. 589, 98 S.Ct. 1306, 55 L.Ed.2d 570 (1978) (recognizing that, in the context of criminal proceedings, the press has a historically-based, common law right of access to judicial records and documents). That right is rooted in common law and predates the Constitution. *Bank of Am. Nat'l Tr. & Sav. Ass'n v. Hotel Rittenhouse Assocs*., 800 F.2d 339, 343 (3d Cir. 1986).

In my case, the Delaware Supreme Court did not make any such findings, and clearly sealed the four docket items in *Kelly v Trump*, Delaware Supreme Court No 119, 2021, DI 16, 21, 40, 41, to benefit the government to my detriment, showing clear prejudice against me, in violation of the procedural and substantive due process clause applicable to the state pursuant to the First and Fourteenth Amendments.

Nothing was normal in *Kelly v Trump*. The State and ODC attacked and retaliated against me for my religious-political speech contained in my petitions, reflecting my religious-political beliefs.[14] The State has a history of ignoring my religious-political petitions, disparately treating me based on religious view point. [15]

This is not the first time, the State through its arm has retaliated against me for its own lawless lusts, convenience, at the exchange of sacrificing Constitutional liberties, including the right to petition. Objxn-D, H, at paragraphs 277-299. I lost more than two million dollars in expected income, but for, the retaliation by the arms of the Court, for petitioning the State through its arms or the Court regarding concerns while taking the Delaware Bar. Id.

Nothing was normal in my disciplinary case either. I was not treated like other lawyers or other plaintiffs. I was disparately treated based on my poverty, and personal-religious-political beliefs, as a party of one, and was selectively punished for exercise of Constitutional liberties. [16]

[14] . Objxn-Ex B-H2, K
[15] MOL Objxn-Ex-H, Objxn-Ex-N-internal-exhibits 1, 2to Exhibit 6, 3 to exhibit 6, 4 to exhibit 6, 5 to exhibit 6, 6 to exhibit 6, 8 to exhibit 6, Exhibit 7-9.
[16] Objxn-K- 8-9, FF, GG, D.I. 55-56.

The State in bad faith prevented and obstructed discovery, to conceal witnesses were removed from the Chancery Court to impede their testimony from aiding in my defense, and to conceal relevant records were sealed by the Court to favor the ODC.[17] The United States Supreme Court held, "the suppression by the prosecution of evidence favorable to an accused upon request violates due process where the evidence is material either to guilt or to punishment." *Moran v. Burbine*, 475 U.S. 412, 466 (1986). Concealing the fact two witnesses were removed from the Chancery Court to prevent their favorable testimony in my defense, and government concealing of petitions favorable to my defense, violates my Due Process rights to a fair proceeding, by bias towards the State.

The Board's findings of fact are not supported by substantial evidence and should not be adopted. The record shows substantial evidence the Board was objectively biased towards the ODC, not fair, and prejudiced against me. The Board denied me of basic Equal protection, procedural and substantive due process rights afforded to similarly situated respondents based on disdain for my religious-political-exercise of fundamental rights and poverty. US Amend I and XIV. I was denied an opportunity to be heard, to prepare and present my case, denied adequate time to perform discovery, denied adequate notice which I at no time waived.[18] The Board gave me 18 days, when the DLRDP Rule 9(d)(3) required, they provide me with notice "at least 20 days in advance of the hearing date," which prejudiced me. *Id*. The Board denied me of an opportunity to subpoena and cross examine witnesses with first-hand knowledge, to conceal the fact the State eliminated two potential witnesses from the court. *Id*.

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[17] *Brady v. Maryland*, 373 U.S. 83, 87 (1963); *United States v. Bagley*, 473 U.S. 667 (1985); United States v. Agurs, 427 U.S. 97 (1976); *Moore v. Illinois*, 408 U.S. 786 (1972)." *Moran v. Burbine*, 475 U.S. 412, 467 n.59 (1986)

[18] Objxn, Ex-M-P-Q-R-R-1-S-T-U-U2-V-W-X-AA-BB-CC-DD-EE-FF-GG-HH, DI 55-56

The state rushed the proceeding and intentionally caused foreseeable emotional distress, in hopes to make me physically ill to use it against me, like heartless monsters. *Id.*

I at no time sat on my rights, but fought for my life and liberty to worship God through the practice of law, and as a citizen without government persecution but for my exercise of fundamental rights. *Id*.

The state denied my 1st and 6th Amendment rights, applicable to the state via the 14th Amendment, to represent myself at the inception, causing me to file pleadings.[19] The Board ignored, and did not address my motions objecting to insufficient notice, by its failure to provide at least 20 days-notice of the hearing, as required by the rules of Disciplinary procedure, Rule 9, which prejudiced my case, motivated by their animosity towards my religious-political beliefs and exercise. Objxn-Ex-M,N, W. I filed objections to the appointment of Counsel, moved for opportunity to perform discovery and postpone the hearing until fair reasonable due process was granted in a motion dated, December 18, 2022. That was ignored. Objxn-Ex-N-M-N-O-P. On December 29, 2021, I filed a letter with the Court requesting relief since the hearing was two weeks away, and I had not even been granted 6th Amendment permission to represent myself to perform discovery or prepare, at the time. Objxn-Ex-P.

It was not until December 30, 2022, the Court granted me the right to self-represent, less than 13 full days before the hearing, with no opportunity to prepare my defense of religious-political petitions, speech, association, beliefs against state persecution, but for my belief in Jesus. Ex-P-2.

[19] Obxn-Ex-N. Mark 13:11 "Whenever you are arrested and brought to trial, do not prepare beforehand about what to say. Just say whatever is given you at the time, for it is not you speaking, but the Holy Spirit."

I was so physically and emotionally exhausted that I fell ill with the shingles. After the reprieve, the small battle of self-representation won, I noticed my rash, pain, lethargy and weakness. Yet, I filed a motion the next day, that was ignored by the Board dated December 31, 2021, to prevent medical and mental examinations, dated December 31, 2021, Ex-Q, and another one dated on or about January 31, 2022, incorporated herein, Ex-X. Physical and mental examinations are against my religious beliefs, and the Court must not maliciously violate my religious beliefs in bad faith.

I followed up with the Board numerous times on the status of my motion to perform discovery, objection to insufficient notice, and postpone the hearing so as not to prejudice me, and at no time sat on my rights. Ex-K-L-M-N-O-P-Q-R-R-1,R-2-S-T-U-U2-V-W-X. I filed additional motions to postpone the hearing so as not to deny me a fair reasonable opportunity to prepare and present my case, perform discovery, cross examine witnesses. Id. I was denied basic due process rights, and substantive due process rights, based on my religious-political exercise of fundamental rights, in violation of the First and Fourteenth Amendment, motivated by the state's disdain towards my personal religious-political beliefs, exercise, speech and petitions demonstrating my faith in Jesus. Id.

I appealed to the Delaware Supreme Court and was denied procedural and substantive due process rights, based on the fact the Court appeared to render a verdict before granting me an opportunity to be heard, motivated by disdain to discriminate me based on my religious beliefs by disparate treatment, unusual to those of other claimants before the court. Ex-R, Ex-R-1, Ex-S, Ex-T, Ex-U, Ex-U-2, Ex-V.

The State ignored and denied me an opportunity to be heard on various motions and appeals, including but not limited to pleadings dated December 18, 2021, December 31, 2022,

January 13, 2022, January 15, 2022, objecting to due process violations, moving to postpone the hearing, to call witnesses, and objecting to the insufficient notice sent out notice 18 days prior to the scheduled hearing. Ex-P-Q-R-R-2-S-T-U-U-2-V-W. I had no time to subpoena witnesses, or even to discover the fact the state eliminated witnesses through terminating their employment in the Chancery Court, and I moved the Board and the Court to grant me time, specifically mentioning Arline Simmons as witness. I at no time waived my insufficient notice argument.

Defendant Kathleen Vavala ("Kathleen"), did not participate in the proceeding until after the hearing took place. Her recital of the DRPC rules to mislead the court is in vain. I was not afforded the protections of the rules, and at no times waived my Constitutional rights to a fair proceeding. The voluminous exhibits the Board ignored, deeming them as irrelevant, are relevant to show in fact the Board denied me an opportunity to be heard on the assertions and pleas contained therein, in defense of my exercise of fundamental rights. The exhibits show I did not sit on my rights or waive them.

Contrary to Kathleen's assertion, having only been granted the right to represent myself 13 days before the hearing date, I was not afforded with ample time to provide a list of witnesses to call 10 days in advance of the hearing, as required under DLRDC (12)(h) as I faced other complications including but not limited to the lack of a phone, computer malfunctioning, the shingles, and vulture destruction of property. See D.I. 55-56. I did not even discover Arline Simmons, a witness I motioned to call, could not be served at the Chancery Court until after the hearing. Objxn-Ex-U. I had insufficient time to effectuate discovery, as I fought to represent myself so as not to violate my religious beliefs. The Board ignored and indirectly denied my requests for time for an opportunity, while rendering an informal, unappealable order in email form. Obxn-M-U2.

The hearing was postponed for 8 days, for a reason I did not assert, my illness, which did not afford me enough time to prepare, research, perform discovery, fully recover, or to subpoena witnesses to notice opposing counsel 10 days in advance. DLRDP (12)(h). Objxn-Ex-R-1. The Board ignored and rendered no orders on other motions, and rendered an E-mail determination, to obstruct formal appeal on January 18, 2022, in the fixed proceeding against me. Objxn-Ex-U-2.

I attempted to require the Board cancel the hearing, in advance, to prevent incurring costs as I was still not feeling well. I was so sick and exhausted and emailed the Board to cancel the hearing. I had no time to prepare, could not sleep, and truly felt sick, but was concerned the State may think I had the plague, Covid-19. Objxn-Ex-EE. I attended the hearing without being afforded an opportunity to prepare, and present my case, call witnesses, perform discovery or even to be human to care for my recovery because I did not want to be held in contempt. I made a special appearance preserving my objections to improper notice, lack of subject matter jurisdiction due to the Delaware Supreme Court's apparent participation in inciting the case, and to object on substantive and procedural Due process and Equal Protections grounds for the disparate treatment against me during the proceeding, and in inciting the proceeding. Objxn.-MOL.

The State knew I was exhausted, recovering from the shingles, lacking of sleep, without being afforded a fair opportunity to prepare and present my case. They did not care about me, or my personal health or my lack of a fair opportunity to present my case for my sake. They appeared to hope I would get sick to use it against me.

I attended the hearing by phone since I had no working computer. Objxn-Ex-GG, D.I. 55-56. Upon receipt of the transcript, I objected, and I object again as the transcript does not

accurately reflect my testimony. The reporter placed words that I did not say in my mouth. Objxn-Ex-AA, BB, CC. It appeared the state set me up. I filed corrections, which in no way make the transcript completely accurate. Id.

Kathleen, did not participate in this action until after the hearing. She relies on the inaccurate transcript I object to, and demeans me for my lack of a working computer and poverty, as evidence of disability. I am so poor I did not have a phone until sometime in January 2022. My computer did not work at the time of the hearing, and my backup computer also malfunctioned. My confusion as to why the computer was not working was absolutely genuine, and not evidence of a disability.

Kathleen's bad faith, or at best ignorant, attacks display her cold heartless indifference towards the substantial burden poverty has placed upon my defense of exercise of fundamental rights in this case.[20] "[A]t all stages of the proceedings the Due Process and Equal Protection Clauses protect [indigent persons] from invidious discriminations" *Lewis v. Casey*, 518 U.S. 343, 370 (1996) "Because this case implicates the [Constitutionally protected] right of access to the courts," and other fundamental rights, the government's disparate treatment towards me, based on poverty, is still unconstitutional under a strict scrutiny basis test. Citing, *Tennessee v. Lane*, 541 U.S. 509, 533 n.20 (2004).[21]

The Record shows the Court denied me an opportunity to be heard, until it was too late, until violations of my First Amendment rights already occurred. Objxn-Ex-R2, V. The Delaware Supreme Court also indicated it made a determination on my defenses before affording me an opportunity to be heard by deeming my claims for an opportunity to prepare and present a

[20] *Abdul-Akbar v. McKelvie*, 239 F.3d 307, 317 (3d Cir. 2001)
[21] *Lewis v. Casey*, 518 U.S. 343, 370 (1996); *Murray v. Giarratano*, 492 U.S. 1, 18 (1989)

case, perform discovery and call witnesses, as frivolous before their assertion, preventing a fair and impartial opportunity to be heard at the hearing, preventing discovery, colluding with the state in the fixed proceeding against me. Objxn-Ex-V It is notable that both the Board and the court waited until two or three days prior to the hearing to address any matter while ignoring motions, leaving them unanswered.

I must be permitted to argue the Disciplinary proceeding be voided by the District Court. The Board and the Court both violated my substantive and procedural due process rights in the Board proceeding in bad faith, with objective partiality towards the government, and prejudice against me.

The Third Circuit held, “A judgment may also be void if a court "acted in a manner inconsistent with due process of law."[22]

I must be permitted to argue the Delaware Supreme Court lacks subject matter jurisdiction or subject matter is voidable for apparently inciting the prosecution, and concealing beneficial evidence in bad faith to prejudice me with partiality to the government to fix the proceeding against me in violation of the Procedural and Substantive Due Process Clause pursuant to the State under the First and Fourteenth Amendments.

The record shows the Delaware Supreme Court through its agents participated in inciting the proceedings against me, acting as witness, prosecutor and judge, and by concealing evidence by 1. inciting the Court’s arms to attack me in *Kelly v Trump*, and the present disciplinary proceeding, 2. collaborating with the Chancery Court and directing Delaware Supreme Court

[22] *Constr. Drilling, Inc. V. Chusid*, No. 03-3786, 2005 WL 1111760, at *3 (3d Cir. May 11, 2005). See Respondent’s Exhibits to the Hearing (“R-Ex”) Exhibits 35, 37 Part 2, 42, R 44

employee Mrs. Robinson to sign off on the departure information of one or two of the former Chancery Court staff workers with information material to my state case, who appeared to lose their jobs, while preventing my opportunity to perform discovery or subpoena the two concealed witnesses, and 3, by eliminating some of the petitions for which the Defendants allege to bring the State action against me, placing them under seal, without notice to me a party, and without lawful reason, such as sensitive information relating to social security or bank accounts, to cover up the Court's and State's lawless acts, with knowledge these petitions are relevant to my defense and the federal proceeding.

Eliminating truth or evidence guarantees injustice. It is my religious belief courts exists to correct and guide those misguided by business greed, profit, position, and power, who sacrifice the lives, health and liberty of others for material gain, essentially selling souls to gain the world, only to lose their own eternal soul by the sin against the holy spirit, hardness of hearts from caring to think, to know, to love others unless it affects them.

Eliminating evidence hides the truth, or diverse views, allowing only the government-backed private partners' and public views to be protected under the Constitution.

The State seek to eliminate me, just as they cover up wrong doing by eliminating witnesses, forcing them to lose their jobs, under the deception of looking after them, only to look after the mere appearance of justice, not actual justice, and by concealing and sealing my pleadings. The Delaware Supreme Court justices do not care to uphold the fundamental rights of those in my class of one, of a person with unique religious-political beliefs which do not conform to the majority's, the individuals within the ODC and/or the judges on the Delaware Supreme Court.

Eliminating people who petition the Court, as "mentally disabled" for thinking the Court would care to help someone who is poor, or who believes in Jesus Christ or diverse political-religious views in that I seek to care for humanity not control them through money, is disparate treatment based on protected view point, in violation of the Equal Protections Clause applicable to the State pursuant to the First and Fourteenth Amendment. US Amend I, and XIV.

The Delaware Supreme Court incited the State's petition, and concealed my religious-political petitions in bad faith with partiality towards the ODC. Joann and the Clerk of Court at the Delaware Supreme Court admitted that the Court sealed two motions, and Exhibits A-4, and A-5, in *Kelly v Trump*, relating to the Court and its agents' disparate treatment towards me. None of the sealed documents contained sensitive information.[23] **(Exhibits F, G)** This was not for my protection or the protection of the parties, but was to cover up Court misconduct, just as the state seeks to eliminate me to conceal government misconduct by labeling me disabled, disparaging my reputation, to deem me not credible. [24]

The Delaware Supreme Court participated in eliminating potential material witnesses by having an agent sign off on the departure forms for two Chancery Court employees, Arline Simmons and Katrina Kruger. The Court colluded to conceal two people with first hand-knowledge of the facts of this case, despite my motion to subpoena one. [25]

I want the court to stop eliminating documents and witnesses, and do not want the court to eliminate the clerk who raised her voice at me on June 2, 2022, while confirming there was no

[23] DI 62-72
[24] . Objxn-K-Ex-31 See letters of recommendation on my behalf concerning my reputation.
[25] Objxn-Ex-T-U-U-2-V.

motion to seal petitions. The court staff who yelled at me in the Chancery Court are gone, no longer employed with the Court, and that breaks my heart.

Covering up mistakes by eliminating those who make them is not correction but concealment, allowing it to be ignored not lovingly corrected. The State seeks to eliminate me to conceal its own wrongs instead of learning from them. [26]

The State's elimination of four sealed and concealed docket items and the elimination of two material witnesses from availability through process by service to the Chancery Court is relevant to my defense of retaliation, discriminatory motive, discriminatory purpose, with a discriminatory outcome made to chill my religious-political speech by demeaning my character as disabled, and threatening my bar licensure's status for exercising political-religious speech, contained in petitions, or outside the petitions, which the government disagrees with, based on religious-political viewpoint.

The Delaware Supreme Court lacks subject matter jurisdiction by its 1st and 14th Amendment substantive and procedural Due Process violations based on its prejudicial treatment in inciting the petition, and disparate treatment during the proceeding.

The Court disregarded my religious beliefs against appointment of counsel, requiring I file multiple pleadings to fight against government compelled violations against my religious beliefs. The Court disregarded my motion concerning the ODC's fraud, committed in bad faith by lying, seeking to commit fraud, concerning receipt of my answers. The Record shows the Court denied me an opportunity to be heard, until it was too late, until violations of my First Amendment rights already occurred. The Delaware Supreme Court also indicated it made a

[26] Objxn-MOL

determination on my defenses before affording me an opportunity to be heard by deeming my claims for an opportunity to prepare and present a case, perform discovery and call witnesses, as frivolous before their assertion, preventing a fair and impartial opportunity to be heard at the hearing, preventing discovery, colluding with the state in the fixed proceeding against me. It is notable that both the Board and the court waited until two days prior to the hearing to address any matter while ignoring motions, leaving them unanswered. I must be permitted these claims as well as other claims before the Delaware District Court to prevent manifest injustice that shocks the conscience by the elimination of any forum to hear my claims, not defenses, for violations of my exercise of fundamental rights and other claims.

VII. CONCLUSION

This appeal to vacate the orders below and remand to the District Court must be granted. I must be afforded an opportunity to be heard upon the substance of my complaint, and motions to safeguard my fundamental rights and other injuries relating upon my exercise of Constitutional liberties, without disparate treatment based on religious-political animus, or poverty animus. US Amend I, V, XIV.

Dated: October 22, 2022

Respectfully submitted,
/s/Meghan Kelly
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Exhibit Q

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	)	Case No 21-3198
	)	Case No. 22-2079
v.	)	
PATRICIA B. SWARTZ, et. al.	)	

Appellant Meghan Kelly's Petition for a Panel Rehearing

Appellant Meghan Kelly's petition for a panel rehearing under Fed.R.App.P. Rule 40 of this Court's Order and opinion on 4/20/2023, at Third Circuit Docket Items (hereinafter "3DI") 3DI-181-182, and aver.

1. The Court abused its discretion by dismissing my appeal in part as moot, since the issue of enjoining an unlawful proceeding is capable of repetition yet evading review, and the Court commits a clear error of law, of fact, creating manifest injustice.

2. The Court abused its discretion by affirming the District Court's judgments at District Court Docket Item Number (Hereinafter "DI") DI-16-17, DI-30-31, DI-59-60.

3. The District Court and the Third Circuit Panel (collectively and individually also referred herein as "Court") abused its discretion in affirming the District Court judgements. I showed availability of new evidence, clear error of law, clear error of fact causing manifest injustice requiring the orders below be vacated and the case be remanded to the District Court. Moreover, even without the new evidence contained in the motions of reconsideration and other motions the Court errs in affirming the judgments below. DI-2-16.

4. The Court overlooked the additional facts I alleged below showing violations of my 1st Amendment religious beliefs, 6th Amendment right to self-represent, 14th Amend. procedural due process violations, violations of Equal Protections, and specific facts showing lack of adequate notice, denial of asserted rights, denial of fair meaningful opportunity to be

heard, to call witnesses, to cross examine my suspected accusers, to prevent evidence in my favor, additional conduct causing emotional distress manifesting in the shingles, the state's elimination of evidence in my favor and other voluminous evidence on the record below, including in my motions for a reconsideration. DI-14, DI-20 through DI-24, DI 29, DI-34 through DI-37, DI-39 through DI-44, DI-47 through DI58, and additional docket items after the Order at DI-60. This new and additional evidence contained in DI-14 through DI-58 must not be ignored. It is part of the record on appeal. The Court also erred by ignoring my challenges to state rules. See DI 58, for one example. I met the standard for reconsideration.

5. As an example in my First Motion for reagument and the amendments thereto, I discussed the State's violations relating to appointment of counsel. I immediately informed the state court I declined representation. I faced foreseeable emotional distress at violating my beliefs in Jesus by such appointment over my objection. Jesus teaches us to let the holy spirit to be our advocate when we are brought to the courts for our religious beliefs. The fact I fought hard to fire the counsel who was removed less than two weeks before the improperly scheduled hearing date, does not remove the Defendants' and the Delaware Supreme Court's violation of my First Amendment right to religious belief and exercise of belief and Sixth Amendment right to self-representation, to opportunity to call witness and other rights applicable to the state pursuant to the 1st, 6th and 14th Amend.

6. The US Supreme Court in *Faretta v. California*, 422 U.S. 806, 95 S. Ct. 2525, 45 L. Ed. 2d 562 (1975) held,

> "Sixth Amendment does not provide merely that defense shall be made for accused but grants to accused personally the right to make a defense; right to self-representation to make one's own defense personally is necessarily implied by structure of the amendment." U.S.C.A.Const. Amend."

7. The Delaware Disciplinary procedure was so lacking in notice or opportunity to be heard before the Delaware original disciplinary proceeding as to constitute a deprivation of due process in the Delaware form. There was such an infirmity of proof as to give rise to the clear conviction that this court could not, consistent with its duty, accept as final the conclusion by the state court.

8. The Court refused to give me pleadings in a case against me to conceal the fact it denied me the opportunity to be heard in objecting to the appointment of counsel, Number 541. I am entitled to records used against me as a party in a proceeding. I am entitled to see if my pleadings were on the record or if I was denied an opportunity to be heard in contravention to 1st and 14th Due Process with disparate treatment based on religious-political belief and poverty. *US Amend I, XIV. See, N. Jersey Media Grp. Inc. v. United States*, 836 F.3d 421, 434 (3d Cir. 2016).

9. The lawyer Disciplinary proceedings before the Defendants and Delaware Supreme Court deprived me of a meaningful opportunity to be heard, the opportunity to prepare, call witness, receive adequate notice, the right to self-represent, to present evidence without the State forum's collusion to conceal evidence and other vitiations of my asserted, not waived Constitutional protections and rights in the Delaware Disciplinary Proceeding. *Greene v. McElroy*, 360 U.S. 474, 475 (1959) ("this Court will not hold that a person may be deprived of the right to follow his chosen profession without full hearings where accusers may be confronted and cross-examined").

10. The US Supreme Court further held, "It is accused, not counsel, who must be informed of nature and cause of accusation, who must be confronted with witnesses against him, and who must be accorded compulsory process for obtaining witnesses in his favor. U.S. Const. Amend. 6." *Faretta v. California*, 422 U.S. 806, 95 S. Ct. 2525, 45 L. Ed. 2d 562 (1975). I was

denied the right of notice, opportunity to confront and right other rights. The Court erred in ignoring these denials contained in my motions for reargument and other motions below.

11. The State denied me of the meaningful opportunity to litigate the question of subject-matter jurisdiction in the sham proceeding against me, and thus I may reopen that question in a collateral attack based on adverse judgment. This Court has not allowed me the opportunity to present the facts to show this. I must be afforded notice and the opportunity to be heard under the 5Th Amendment applicable to the federal courts to prevent unconstitutional vitiation of rights by this Court. US Amend I, V.

12. I incorporate herein by reference in its entirety along with the pleadings referred therein 3DI-98, the memory stick referred to at DI-58, and the District Court items DI-62 to DI-148 since this Court appeared to consider the additional Orders at DI-106, DI-111. The Court errs as a matter of law and as a matter of fact creating manifest injustice against me by ignoring the legal arguments, claims and additional facts on the record below. Id.

13. The Court errs as a matter of law for not considering my motion to withdraw my motion to amend the complaint at DI 43, my additional motions to amend the complaint as a matter of right to include additional claims, facts, foreseeable harm and additional information discovered and arising in the course of this litigation, including but not limited to items in DI-43, DI-58, DI 69-75, DI-77, DI-81, DI-85-87. DI 95.

14. The Court abused its discretion in denying me the right to amend the complaint as a matter of right, despite the lower Court not ruling on my motion to amend which I withdrew and reserved the right to amend as a matter of right prior to the Order at DI 60, (DI 58) and more specifically after the order when the case is remanded DI 43, DI 58, DI 69 through 81.

15. My claims relate not only to my petitions in Kelly v Trump but also First Amendment violations of my right to petition applicable to the state pursuant to the 14th Amendment regarding petitions for bar dues. DI 2-4, 3DI 74. Should this case be dismissed the statute of limitations would foreclose me an opportunity to assert my claims anywhere in the only forum which may offer relief, the District Court. This Court was apprised of the Delaware Supreme Court's collusion in Kelly v Trump and the DE Disciplinary proceeding, and my claims for damages, nominal relief and equitable relief other than enjoining the disciplinary proceeding. DI 43, DI 58, 3DI-6 page 3 through 11, 3DI-26 through 3DI-29, 3DI-31-32, 3DI 36 through 3DI 46, 3DI 51 through 3DI 62, 3DI-68, 3DI-69, 3DI-71-3DI-76, 3DI-83-84, 3DI-93, 3DI-95 through 3DI-99, 3DI-103-107, 3DI-119-3DI-198; See, Reed v. Goertz, No. 21-442, at *5 (Apr. 19, 2023)("*Ex parte Young* doctrine allows suits like Reed's for declaratory or injunctive relief against state officers in their official capacities.") Id at 6-7 and 24 (*Rocker-Feldman* and 28 USC 1257 do not prohibit violations of procedural due process claims); *See, Centifanti v. Nix*, 865 F.2d 1422, 1430 (3d Cir. 1989).

16. Further whether Rooker-Feldman applies to claims I have not yet made is not ripe on appeal. The District Court did not review the merits of my claims. This appeal is limited to the improvident dismissal under Younger, and denial of my asserted right to amend the complaint once as a matter of right. The claims if accepted as pled show independent federal claims I must be allowed to argue before preemptive denial, including but not limited to void or voidable subject matter jurisdiction of the Delaware forum. US Amend V. I also seek to amend the complaint to include a number of new claims too numerous to outline that I must be afforded the opportunity to be heard on before being preemptively denied in violation of the US Amend V opportunity to be heard, including but not limited to assertions that DE Disciplinary rules are

unconstitutional per se and some as applied which are not prohibited by the Rocker-Feldman doctrine. See, *Parkview Assoc. Partnership v. City of Lebanon*, 225 F.3d 321, 327-28 (3d Cir. 2000); *Skinner v. Switzer*, 562 U.S. 521, 532 (2011); Id at 33 n 10("The Court further observed in *Exxon Mobil Corp. v. Saudi Basic Industries Corp*., 544 U.S. 280, 292–293, 125 S.Ct. 1517, 161 L.Ed.2d 454 (2005), that '[w]hen there is parallel state and federal litigation," state preclusion law may become decisive, but "[p]reclusion ... is not a jurisdictional matter.'").

17. This Court errs in finding no legal bar in presenting my claims before the state forum. The Disciplinary proceeding forbids asserting my claims for damages, nominal relief and equitable relief against the Defendants and State court under the state disciplinary proceeding. The proceeding is limited in subject matter jurisdiction under Del. Disc. Rule 1(a), 5, 10. Claims for damages, nominal damages and equitable relief are prohibited. See, *In re a Member of the Bar of the Supreme Court, of the State Enna*, 971 A.2d 110, 125 (Del. 2009), regarding limited jurisdiction. Moreover, even if the State Court entertained my claims, my procedural due process rights are violated by a partial, unfair, biased forum. US Amend I, XIV. The Federal Forum is the only forum which has jurisdiction over my claims. The Supreme Court had no jurisdiction to resolve claims for damages, nominal relief and equitable relief against the state and itself in a disciplinary proceeding. This creates a bar. The lack of personal jurisdiction over the Delaware Supreme Court members which violates the 14th Amendment also places a bar to my claims in the state proceeding. Allowing the State Court to rule in its own favor in a partial forum offends the notions of fairness and jurisdiction apparently may be upheld under the Fourteenth Amendment Due process Clause applicable to the Defendants and the state Court. The Delaware Supreme Court does not have personal jurisdiction over its own alleged Constitutional and federal violations wherein it is the judge and party. *Ins. Corp. of Ir. v. Compagnie Des Bauxites*

De Guinee, 456 U.S. 694 702-03 (1982) (“The requirement that a court have personal jurisdiction flows not from Art. III, but from the Due Process Clause. US Amend XIV. The personal jurisdiction requirement recognizes and protects an individual liberty interest. It represents a restriction on judicial power not as a matter of sovereignty, but as a matter of individual liberty. Thus, the test for personal jurisdiction requires that "the maintenance of the suit . . . not offend 'traditional notions of fair play and substantial justice.'" International Shoe Co. v. Washington, 326 U.S. 310, 316 (1945).

18. Younger does not require abstention to my case. The state case has concluded. There is no bar. Even if there was a case: 1. Younger does not apply to my claims for damages and nominal relief and different equitable relief I sought below. DI 2-43, 58. The Court erred by dismissing instead of staying the case 2. Younger does not apply to federal constitutional claims or ancillary claims I had no opportunity to assert on the state forum, including but not limited to 42 U.S.C.A. §§§ 1983, 1985, 1988, my defamation claims, claims for emotional distress, damages and nominal relief for First Amendment claims and the additional claims I should be afforded an opportunity to include in an amended complaint, which I do not have the space or time to outline at this point as improvident. 3. Bad faith, harassment, or extraordinary circumstances have arisen in my case that make abstention inappropriate including the Delaware Supreme Courts collusion with the Defendants by secretly knowingly concealing two material pieces of evidence necessary for my defense, and preventing their discovery to fix the outcome in bad faith. In addition the State Court incited the disciplinary proceeding for improper purposes. DI 58, DI 77. The Court selectively discriminated against me, compelled me to violate my asserted religious right to religious belief and self-representation causing emotional distress so great a police man checked on me, denied me of sufficient notice, denied meaningful

opportunity to be heard, ignored my motions to subpoena witnesses and perform discovery. (DI 20-24, DI 34-39, DI 41). 4.The Courts erred in denying my right to amend the complaint as a matter of right to amend the complaint to include procedural and substantive due process violations, equal protections violations, 6th Amendment violations, Constitutional challenges to the Delaware Rules of Disciplinary procedure, ADA physical disability claims and other conduct and claims that required I add the Delaware Supreme Court and the members to my complaint on January 24, 2022. (DI 43, 3DI 98).

19. I must be granted leave to amend the complaint as a matter of right under FRCP(a), to correct any defects or arguments relating to a Younger dismissal to prevent manifest injustice that shocks the conscience in terms of loss of fundamental rights, and government punishment for the exercise of my rights, including the right to petition. See, *Mayle v. Felix*, 545 U.S. 644, 663 (2005). The Supreme Court in *Foman v. Davis*, 371 U.S. 178, 182 (1962) held the "outright refusal to grant the leave [to amend the complaint] without any justifying reason appearing for the denial is not an exercise of discretion; it is merely abuse of that discretion and inconsistent with the spirit of the Federal Rules." This Court abuses its discretion by denying my asserted right to amend the complaint. 3DI 98.

20. The new and additional facts and arguments contained in my motions and pleadings must be considered to prevent abuse of discretion, clear error of law, clear error of fact and to prevent manifest injustice against me by denying me the opportunity to be heard to safeguard my exercise of First Amendment rights, creating loss of First Amendment rights and my interest in my ability to work in my profession

21. I respectfully request this Court vacate the District-Order, and remand the case back to the Delaware District Court for review, granting leave to amend the complaint in the

amount of 30 days from the date of the order or longer period to allow me to consult with opposing counsel in good faith since I believe the courts and the government are in peril. I believe the courts are our hope of a hero to prevent or reverse an economic crash, which appears to be designed to eliminate the government down the line. I hope the court may use this case to safeguard the Constitutional limits which preserve these United States from demise.

22. The Third Circuit and District Court (hereinafter "Courts") overlooked the fact I invoked my right to amend the complaint once as a matter of right under FRCP Though the Court argues my plea to enjoin the case against me as moot. This is capable of repetition and evading review, and has created manifest injustice against me as well as other lawyers and professionals who have legitimate claims for which they should not be punished for making in violation of the First Amendment right to petition, merely because the claims are against the government or government agents. This disparately favors government agents in violation of the Equal protections Clause in their private and official capacity, making it impossible to correct misconduct by just decrees.

23. Court overlooked the fact I have colorable claims against the Delaware Supreme Court and its members in both their professional and personal capacity, under an Ex Parte Younge theory as well as equitable claims for prospective and other relief. In Ex Parte Young, 209 U.S. 123, 28 S.Ct. 441, 52 L.Ed. 714 (1908).

24. Delaware brought a disciplinary case against me to conceal and cover up its violation of federal laws and my Constitutional rights, and to punish me for the exercise of Constitutional rights including but not limited to the First Amendment right to petition the courts for disparate treatment by its own members based on religious-political-or poverty animus and procedural due process violations. DI 2-4 My religious beliefs in Jesus outlined in my petitions

are the source of Defendants adjudication of disability. They indicate my religious beliefs confuse Defendants. They cite my belief in the Bible as a source of the disciplinary proceeding at Number 7 of the petition. They cite my protected private speech outlined in my private petitions outlining my private religious beliefs and exercise of religious beliefs in the letter dated August 23, 2023 as the source of concern of disability.

25. The baseless allegations the panel cites, that I allegedly "lack competence to practice law and endanger prospective clients, the public and the orderly administration of justice" is to cover up my petitions to the courts for the governments' violation of the Constitution and federal law, including its own violations. The State Court intentionally secretly sealed my petitions in violation of my First Amendment right to petition to conceal material evidence in my favor to cover up its own violations of my procedural and substantive due process rights. This concealmemt is also a procedural due process violation.

26. The Court asserts my legitimate arguments are not cogent, in order to cover up its own misconduct, while further covering up State misconduct by adjudicating me disabled. It may not be convenient to uphold justice. It is easier to orderly administer standardized injustice than to uphold the 1st Amendment applicable to the State via the 14th to accommodate individuals whose religious beliefs or arguments are not standardized to the common norms. Nevertheless, the asserted Constitutional limits supersede eliminating freedom for convenience, productivity and administration of court business. Freedoms are not for sale, or none are free. We are for sale products to bargain favor with foreign and private government partners. My license to practice law was not exchanged for the freedom to belief in Jesus Christ or other Constitutional liberties.

27. This Appellate Court improvidently cites to the mere allegations that my religious beliefs in the petitions are not clear, unfocused [to the Defendants' aim] and confused the

Defendants. My religious beliefs need not be clear, nor do they need to understand them for me to assert my First Amendment right to genuine religious belief without a government incited substantial burden but for the exercise of religious belief and other First Amendment rights. Moreover, they are relevant to this matter, Kelly v Trump, and the disciplinary proceedings even if Defendants do not find my religious belief in Jesus Christ not money as savior and God reasonable. *Matthew* 6:24.

28. This Court improvidently cites the false allegation my pleadings "were non-complaint with the Court rules." There is no rule I violated during Kelly v Trump, or the Delaware Disciplinary proceeding.

29. Moreover, the Defendants were non-compliant with rules, preemptive federal law and the preemptive Constitution limits which restrain their conduct within the purview of superseding law. The allegation my defense of religious beliefs contained in my speech "were confusing and unfocused and irrelevant to the issues at hand" are to cover up the very real issues that were relevant to whether the disability proceeding was brought in retaliation for my exercise of the right to petition the State over the course of about 20 years, and my right to private religious-political belief, private-religious exercise of belief, private right to associate based on religious-political belief without being restrained by a mere license to practice law, and right to equal protections, procedural due process and to be free from collusion to intimidate me to cause me to withdraw my petitions in Kelly v Trump in violation of 1985 and 1988, the First Amendment applicable to the state pursuant to the 14th Amendment, other federal law, and state claims for intentional or reckless infliction of emotional distress, defamation and other claims.

30. Defendants made a motion by short letter despite my objection to appointed counsel in violation of my First Amendment right to petition. I certainly was permitted to draft a letter, dated December 18, 2022. Albeit, I also drafted motions. DI 1-DI 58.

31. This Court errs as a matter of law and as a matter of fact by claiming the "Delaware Supreme Court's order adjusting her status, claiming she was denied notice, discovery, an impartial judge, an ability to present evidence and witnesses, and the like are beyond the scope of this appeal." I asserted these claims in legal and factual arguments below, including in my motions of reagument. They are material to the District Court's clear error of fact, clear error of law and this appeal to prevent manifest injustice against me, and others by creating case law which will chill the exercise of professionals' religious beliefs under the threat they may no longer buy and sell and die of want.

32. Even if the Court finds the fact my poverty, limited access to research, and poor typing skills create a burden to the Court. The Court has unclean hands as I asserted stays in order to gain time needed to research, draft and proofread petitions without waiver of rights. Moreover, I have not practiced law in years. If this Court finds me disabled, it does not grant the State a right to eliminate fundamental rights of every claimant they deem disabled or dumb, including me.

33. This case presents a unique important Constitutional question as to whether a disciplinary proceeding brought to punish petitions against the government, in violation of the US Amend I right to petition, and right to speech, on subject matter grounds, and the Equal Protections Clause is subject to voidability. Defendants seek to discipline Colleague Abbott for petitioning against the County and Courts. Are the courts above the law, or will this Court rule

judges may be corrected within the purview of the Constitutional limits 1. Cases and controversies and impeachment, without vindictive retribution for correction.

Dated June 3, 2023

Respectfully submitted,

/s/Meghan Kelly

_____

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EXHIBIT R

THE SUPREME COURT OF THE STATE OF DELAWARE

In the Matter of a Member of the Bar of the	)	Supreme Ct. No. 58, 2022
Supreme Court of the state of Delaware	)	Misc. 541,
Meghan M. Kelly, respondent.	)	Board Case No. 115327-B

Respondent's reply to ODC's Corrected Response to Respondent's Objections to the Report and Recommendation of the Board on Professional Responsibility

Respondent, Meghan Kelly, pro se this June 7, 2022, files this reply, contemporaneously, with *Respondent's Meghan Kelly's Motion to exceed the word limit in my Reply to ODC's Corrected Response to Respondent's Objections to the Report and Recommendation of the Board on Professional Responsibility*, incorporated herein in its entirety by this reference, and *Respondent's Meghan Kelly's Motion to be excused from the notary and affirming requirements in Delaware Court pleadings*, incorporated herein in its entirety by this reference.

I Introductory Arguments

The ODC's factual characterizations, legal arguments by Kathleen Vavala ("KV" or "Kathleen"), and the Office of Disciplinary Counsel ("ODC") asserted below, and in the *ODC's Corrected Response to Respondent's Objections to the Report and Recommendation* ("KV") *of the Board on Professional Responsibility* ("Board"), and the Board's findings, in this fixed, unfair partial proceeding brought in conspiracy by the Delaware Supreme Court, Chancery Court agents, ODC and Board, (collectively, and individually "State") to conceal Court agents' unconstitutional interference with the "due process" adjudication of *Kelly v Trump*, and thereby in interference with my personal-religious-political-speech; personal-religious-beliefs; personal-religious-political-exercise; and personal-religious-political-petitions has punished me and violated by constitutional protections by selective disparate treatment against me, for the exercise of fundamental rights, as a party of one, as an indigent individual with religious-political beliefs

in God as savior and the state as civil authority curbed by the first amendment from "establishing religion."

The State's findings must be rejected as a matter of law as an abuse of discretion, clearly erroneous findings of fact, an errant conclusion of law, and an improper application of law to facts.

The hearings and actions taken against my professional license in retaliation for my exercise of Constitutional rights are in violation of the First Amendment, the Procedural and Substantive Due Process Clause and Equal Protection Clauses of the Fourteenth Amendment. They must be rejected as by "rule of law" rather than personal vendetta for my personal-religious-political speech contained in the petitions. (US Amend I, XIV)

The State denied me of substantive and procedural due process rights in this disciplinary proceeding.[27] The record shows clear and convincing evidence that the proceedings were brought, with religious-political animus, in retaliation against me for filing *Kelly v Trump* and for petitioning the court regarding bar dues to safeguard my liberties.[28]

The state abused its discretion by 1. Vindicative prosecution, which constitutes a violation of due process, and by Selective prosecution, which constitutes a denial of equal protection.

The state courts are also without subject matter jurisdiction due to their conduct and interreference with Kelly v Trump, to fix the outcome of that case and their participation in

[27] Objxn
[28] Id.

fixing the sham trial against me in the disciplinary action by violating my procedural and substantive due process rights rendering both the action voidable.

I have a right to petition the courts when I believe a transgression has been committed against me by the establishment of government religion by President Trump.

I uphold my oath by requesting government agents, judges, presidents and members of congress to adhere to rule of law by allowing me to exercise my Constitutional rights. The steps taken to orchestrate this proceeding circumvent due process protections and, thereby, manifest selective; targeted; unjust persecution.

I include, restate and incorporate by this reference my Objections to the Report, the exhibits referred therein, and the Memorandum of Law ("MOL," at DI 31), and all arguments and points made in each and every one of these documents, filed on May 21, 2021, are restated in this reply. DI. 26-50 ("Objxn" and "-" or "-Ex-" for specific exhibits therein).

I incorporate herein in its entirety, by this reference *Respondent's Motion for a free copy of the record of the Board and Before the Delaware Supreme Court* [(hereinafter also referred to as, "Court")], *which is required for Appeal*, filed on May 10, 2022. D.I. 55-56.

I incorporate herein in its entirety by this reference *Respondent's Motion for an extension of Time under Rule 15(b)(i) and (iii)*, filed on May 16, 2022. DI 62-72.

II. Background: The Court made insidious attacks, through its arms and agents in retaliation for my exercise of fundamental rights in petitioning the Court in *Kelly v Trump*, to interfere with, and affect the outcome, and sought to conceal such attacks by eliminating witnesses participating in the attacks, eliminating pleadings, and eliminating me by defaming my character, as not credible, disabled.

The State brought this petition against me to conceal state misconduct, and to retaliate against me for the exercise of Constitutionally protected activity based on disdain towards me for my religious-political-beliefs, poverty, and to conceal Court agents' misconduct.[29]

I filed a RFRA lawsuit against President Trump seeking to dissolve the establishment of government-religion to alleviate a substantial burden upon my free exercise of religious beliefs, without government incited persecution as a Christian, Catholic, Democrat, living in Trump territory, in Sussex County, Delaware.[30]

I do not believe my former law firm would have hired me back if I sued the popular president. So, I put off seeking to rejoin my former real estate settlement law firm, in order to safeguard my free exercise of religious beliefs without government incited private economic, social or physical persecution. [31]

Since, I was not working for pay, I petitioned the Delaware Supreme Court for relief from attorney dues for all lawyers facing economic hardship or unemployed during the global pandemic.[32] My request was not granted. Id.

I had planned on rejoining my former law firm, after *Kelly v Trump* was complete. However, I decided to hold off until the conclusion of the disciplinary proceeding granting me my active law license. I halted communications with my potential employer around August of 2021. I believe I emailed the last communication with my potential employer to Disciplinary Counsel Patricia Swartz, in response to her questions on the date of the hearing.

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[29] (ObjxA-H-2, N, including internal exhibits, P, including internal exhibits, K-including internal exhibits, DI 62-72); MOL.
[30] . (Objxn-A, DI 62-72, Ex-C)
[31] (DI 62-72, Internal-Exhibit C, which includes pleadings in Kelly v Trump, Objxn-E)
[32] (Objxn-E-F, K-internal exhibits 20-24)

The State seeks to compel me into permanent poverty by demeaning my reputation as disabled by wrongly bringing this disciplinary proceeding against me for my religious-political speech contained in my petitions.

Nothing was normal during *Kelly v Trump*. Court staff appeared to seek to sabotage my case, based on my political-religious beliefs and/or indigency, by 1. misleading me to almost miss my deadline to appeal, 2. Appearing to disparage me based on religious-political beliefs or/and poverty, 3. instructing me to write off the Attorney General's address, which impeded service, and 4. By writing on a praecipe, causing confusion, and needless pleadings.[33]

To worsen matters, the Delaware Supreme Court appeared to cause its arms to attack me to get me to forgo my lawsuit. [34] DE-Lapp's letter indicated the relief requested from the DE Supreme Court, relating to bar dues, as the source of its interference with my law suit. Id. **(Exhibit A, B, C)** The Clerk of Court confirmed the entire court reviewed my petitions relating to attorney dues, evidencing the entire Court incited the interference in *Kelly v Trump*.

Further, Sussex Court of Common Pleas Judge Kenneth S. Clark, interrogated me at the arms of the court's request in public at BJ's, located in Millsboro. He demanded I come to his chambers for filing *Kelly v Trump* to obstruct, impede or cause me to forgo my lawsuit. Id.

Other parties are not threatened by Court agents wearing the cloak of government authority to obstruct, impede or cause claimants to forgo cases whose religious-political beliefs they disagree with. Minorities like myself, whose religious-political beliefs do not conform to the mainstream are still afforded Constitutional protections for exercise of fundamental rights

[33] (Objxn-B-D, K-internal-exhibits-2-7, 27-29, DI 62-72.
[34] DI 62-72, Objxn-E-G, K-internal Ex-20-26-29.

relating to their diverse, tightly held religious-political beliefs, including speech defending such rights in petitions.[35]

I petitioned the Delaware Supreme Court concerning the disparate treatment. The Delaware supreme Court ruled my case was frivolous, and indicated my petitions relating to disparate treatment need not be addressed.

The Court's disagreement with my religious beliefs is an impermissible reason to deem me disabled. "Courts have no business addressing whether sincerely held religious beliefs asserted in a RFRA case, [including mine] are reasonable." *Burwell v. Hobby Lobby Stores, Inc*., 573 U.S. 682, 682. The government may not determine what is and what is not an acceptable religious belief.[36] My God is the arbiter of my life, regarding religious beliefs, not the government, even when the government deems my religious beliefs wrong or a disability.

The Courts misguided conclusion that my case is frivolous is not a permissible reason to deem me disabled. Other lawyers have their cases and their clients' cases kicked out as frivolous and they are not disciplined or deemed a danger to society. My religious-political beliefs is the ODC's admitted reason for their claim for disability and for disciplining me. (**Exhibits E, F**)

On August 23, 2021, the ODC sent me a threatening letter by email, interfering with my active case, but for my petitions, before I appealed the Delaware Supreme Court's decision to the United States Supreme Court, admitting my Delaware Supreme Court and Chancery Court

[35] *Obergefell v. Hodges*, 576 U.S. 644

[36] *Employment Div., Dept. of Human Resources of Ore. v. Smith*, 494 U. S. 872, 887, 110 S. Ct. 1595, 108 L. Ed. 2d 876 (1990). ("the First Amendment forbids civil courts from" interpreting "particular church doctrines" and determining "the importance of those doctrines to the religion.")

religious-political pleadings, as the reason for their attack.[37] **(Exhibit E).** The ODC's attack was "unconstitutional on its face and as applied." *Hill v. City of Scranton*, 411 F.3d 118, 122 (3d Cir. 2005). Should they have any legitimate concerns, which the record shows none, the ODC should not have interfered with my First Amendment exercise of petitioning the courts, to affect the outcome or pressure me to forgo the case, in violation of US Amend I and XIV. Id. at 125-126.

On October 25, 2021, I filed a lawsuit to enjoin the ODC for retaliating against me for exercising fundamental rights, and for damages for emotional relief.[38] On November 1, 2021 the US Supreme Court denied my writ of certiorari.[39]

On November 4, 2021, Delaware Supreme Court sealed my Delaware Supreme Court petitions in *Kelly v Trump* relating to disparate treatment, without notice and an opportunity for me, a party to be heard, and without valid cause. [40]

I did not have access to the sealed documents, through public record, nor did the ODC, the public, or the federal courts, which prejudiced me to the benefit of the State. [41] Third Circuit Judge Bright's, concurring in part and dissenting in part in *U.S. v. Wecht,* 484 F.3d 194, 221, 226

[37] Objxn-K-Internal-Ex-5-7.
[38] Objxn-H
[39] Objn-K-Ex-1.
[40] (DI 62-72)
[41] (*N. Jersey Media Grp. Inc. v. United States*, 836 F.3d 421, 434 (3d Cir. 2016), "We have previously recognized a right of access to judicial proceedings and judicial records, and this right of access is beyond dispute." *Pansy v. Borough of Stroudsburg*, 23 F.3d 772, 780-81 (3d Cir. 1994) (internal quotation marks omitted); see also *Nixon v. Warner Commc'ns, Inc*., 435 U.S. 589, 98 S.Ct. 1306, 55 L.Ed.2d 570 (1978) (recognizing that, in the context of criminal proceedings, the press has a historically-based, common law right of access to judicial records and documents). That right is rooted in common law and predates the Constitution. *Bank of Am. Nat'l Tr. & Sav. Ass'n v. Hotel Rittenhouse Assocs*., 800 F.2d 339, 343 (3d Cir. 1986).

(3d Cir. 2007) indicated sealing documents without notice or opportunity for a party to be heard without valid reason was enough to remove a judge from a case.

In my case the Delaware Supreme Court, sua sponte, sealed documents to assist the ODC's prosecution of me by concealing relevant material to my defense, evidencing the entire court's apparent bias against me and the Court's partiality to the state.

"When a court considers the imposition of a seal, it must make particularized findings on the record, giving notice on the docket of such consideration and rejecting alternatives to closure." *U.S. v. Wecht*, 484 F.3d 194, 224 (3d Cir. 2007); See *United States v. Criden*, 675 F.2d 550, 560 (3d Cir.1982).

In my case, the Delaware Supreme Court did not make any such findings, and clearly sealed the four docket items in *Kelly v Trump*, Delaware Supreme Court No 119, 2021, DI 16, 21, 40, 41, to benefit the government to my detriment, showing clear prejudice against me, in violation of the procedural and substantive due process clause applicable to the state pursuant to the First and Fourteenth Amendments.

Nothing was normal in *Kelly v Trump*. The State and ODC attacked and retaliated against me for my religious-political speech contained in my petitions, reflecting my religious-political beliefs.[42] The State has a history of ignoring my religious-political petitions, disparately treating me based on religious view point. [43]

This is not the first time, the State through its arm has retaliated against me for its own lawless lusts, convenience, at the exchange of sacrificing Constitutional liberties, including the

[42] . Objxn-Ex B-H2, K

[43] MOL Objxn-Ex-H, Objxn-Ex-N-internal-exhibits 1, 2to Exhibit 6, 3 to exhibit 6, 4 to exhibit 6, 5 to exhibit 6, 6 to exhibit 6, 8 to exhibit 6, Exhibit 7-9.

right to petition. Objxn-D, H, at paragraphs 277-299. I lost more than two million dollars in expected income, but for, the retaliation by the arms of the Court, for petitioning the State through its arms or the Court regarding concerns while taking the Delaware Bar. Id.

III. The Board and Court's violations of substantive and Procedural Due Process in Disciplinary Matter eliminate subject matter jurisdiction and make their judgments void as a matter of law

Nothing was normal in my disciplinary case either. I was not treated like other lawyers or other plaintiffs. I was disparately treated based on my poverty, and personal-religious-political beliefs, as a party of one, and was selectively punished for exercise of Constitutional liberties. [44]

The State in bad faith prevented and obstructed discovery, to conceal witnesses were removed from the Chancery Court to impede their testimony from aiding in my defense, and to conceal relevant records were sealed by the Court to favor the ODC.[45] The United States Supreme Court held, "the suppression by the prosecution of evidence favorable to an accused upon request violates due process where the evidence is material either to guilt or to punishment." *Moran v. Burbine*, 475 U.S. 412, 466 (1986). Concealing the fact two witnesses were removed from the Chancery Court to prevent their favorable testimony in my defense, and government concealing of petitions favorable to my defense, violates my Due Process rights to a fair proceeding, by bias towards the State.

[44] Objxn-K- 8-9, FF, GG, D.I. 55-56.
[45] *Brady v. Maryland*, 373 U.S. 83, 87 (1963); *United States v. Bagley*, 473 U.S. 667 (1985); United States v. Agurs, 427 U.S. 97 (1976); *Moore v. Illinois*, 408 U.S. 786 (1972).” *Moran v. Burbine*, 475 U.S. 412, 467 n.59 (1986)

The Board's findings of fact are not supported by substantial evidence and should not be adopted. The record shows substantial evidence the Board was objectively biased towards the ODC, not fair, and prejudiced against me. The Board denied me of basic Equal protection, procedural and substantive due process rights afforded to similarly situated respondents based on disdain for my religious-political-exercise of fundamental rights and poverty. US Amend I and XIV. I was denied an opportunity to be heard, to prepare and present my case, denied adequate time to perform discovery, denied adequate notice which I at no time waived.[46] The Board gave me 18 days, when the DLRDP Rule 9(d)(3) required, they provide me with notice "at least 20 days in advance of the hearing date," which prejudiced me. *Id*. The Board denied me of an opportunity to subpoena and cross examine witnesses with first-hand knowledge, to conceal the fact the State eliminated two potential witnesses from the court. *Id*.

The state rushed the proceeding and intentionally caused foreseeable emotional distress, in hopes to make me physically ill to use it against me, like heartless monsters. *Id.*

I at no time sat on my rights, but fought for my life and liberty to worship God through the practice of law, and as a citizen without government persecution but for my exercise of fundamental rights. *Id*.

The state denied my 1st and 6th Amendment rights, applicable to the state via the 14th Amendment, to represent myself at the inception, causing me to file pleadings.[47] The Board ignored, and did not address my motions objecting to insufficient notice, by its failure to provide at least 20 days-notice of the hearing, as required by the rules of Disciplinary procedure, Rule 9,

[46] Objxn, Ex-M-P-Q-R-R-1-S-T-U-U2-V-W-X-AA-BB-CC-DD-EE-FF-GG-HH, DI 55-56
[47] Obxn-Ex-N. Mark 13:11 "Whenever you are arrested and brought to trial, do not prepare beforehand about what to say. Just say whatever is given you at the time, for it is not you speaking, but the Holy Spirit."

which prejudiced my case, motivated by their animosity towards my religious-political beliefs and exercise. Objxn-Ex-M,N, W. I filed objections to the appointment of Counsel, moved for opportunity to perform discovery and postpone the hearing until fair reasonable due process was granted in a motion dated, December 18, 2022. That was ignored. Objxn-Ex-N-M-N-O-P. On December 29, 2021, I filed a letter with the Court requesting relief since the hearing was two weeks away, and I had not even been granted 6th Amendment permission to represent myself to perform discovery or prepare, at the time. Objxn-Ex-P.

It was not until December 30, 2022, the Court granted me the right to self-represent, less than 13 full days before the hearing, with no opportunity to prepare my defense of religious-political petitions, speech, association, beliefs against state persecution, but for my belief in Jesus. Ex-P-2.

I was so physically and emotionally exhausted that I fell ill with the shingles. After the reprieve, the small battle of self-representation won, I noticed my rash, pain, lethargy and weakness. Yet, I filed a motion the next day, that was ignored by the Board dated December 31, 2021, to prevent medical and mental examinations, dated December 31, 2021, Ex-Q, and another one dated on or about January 31, 2022, incorporated herein, Ex-X. Physical and mental examinations are against my religious beliefs, and the Court must not maliciously violate my religious beliefs in bad faith.

I followed up with the Board numerous times on the status of my motion to perform discovery, objection to insufficient notice, and postpone the hearing so as not to prejudice me, and at no time sat on my rights. Ex-K-L-M-N-O-P-Q-R-R-1,R-2-S-T-U-U2-V-W-X. I filed additional motions to postpone the hearing so as not to deny me a fair reasonable opportunity to prepare and present my case, perform discovery, cross examine witnesses. Id. I was denied basic

due process rights, and substantive due process rights, based on my religious-political exercise of fundamental rights, in violation of the First and Fourteenth Amendment, motivated by the state's disdain towards my personal religious-political beliefs, exercise, speech and petitions demonstrating my faith in Jesus. Id.

I appealed to the Delaware Supreme Court and was denied procedural and substantive due process rights, based on the fact the Court appeared to render a verdict before granting me an opportunity to be heard, motivated by disdain to discriminate me based on my religious beliefs by disparate treatment, unusual to those of other claimants before the court. Ex-R, Ex-R-1, Ex-S, Ex-T, Ex-U, Ex-U-2, Ex-V.

The State ignored and denied me an opportunity to be heard on various motions and appeals, including but not limited to pleadings dated December 18, 2021, December 31, 2022, January 13, 2022, January 15, 2022, objecting to due process violations, moving to postpone the hearing, to call witnesses, and objecting to the insufficient notice sent out notice 18 days prior to the scheduled hearing. Ex-P-Q-R-R-2-S-T-U-U-2-V-W. I had no time to subpoena witnesses, or even to discover the fact the state eliminated witnesses through terminating their employment in the Chancery Court, and I moved the Board and the Court to grant me time, specifically mentioning Arline Simmons as witness. I at no time waived my insufficient notice argument.

Kathleen, did not participate in the proceeding until after the hearing took place. Her recital of the DRPC rules to mislead the court is in vain. I was not afforded the protections of the rules, and at no times waived my Constitutional rights to a fair proceeding. The voluminous exhibits the Board ignored, deeming them as irrelevant, are relevant to show in fact the Board denied me an opportunity to be heard on the assertions and pleas contained therein, in defense of my exercise of fundamental rights. The exhibits show I did not sit on my rights or waive them.

Contrary to Kathleen's assertion, having only been granted the right to represent myself 13 days before the hearing date, I was not afforded with ample time to provide a list of witnesses to call 10 days in advance of the hearing, as required under DLRDC (12)(h) as I faced other complications including but not limited to the lack of a phone, computer malfunctioning, the shingles, and vulture attacks. See D.I. 55-56. I did not even discover Arline Simmons, a witness I motioned to call, could not be served at the Chancery Court until after the hearing. Objxn-Ex-U. I had insufficient time to effectuate discovery, as I fought to represent myself so as not to violate my religious beliefs. The Board ignored and indirectly denied my requests for time for an opportunity, while rendering an informal, unappealable order in email form. Obxn-M-U2.

The hearing was postponed for 8 days, for a reason I did not assert, my illness, which did not afford me enough time to prepare, research, perform discovery, fully recover, or to subpoena witnesses to notice opposing counsel 10 days in advance. DLRDP (12)(h). Objxn-Ex-R-1. The Board ignored and rendered no orders on other motions, and rendered an E-mail determination, to obstruct formal appeal on January 18, 2022, in the fixed proceeding against me. Objxn-Ex-U-2.

I attempted to require the Board cancel the hearing, in advance, to prevent incurring costs as I was still not feeling well. I was so sick and exhausted and emailed the Board to cancel the hearing. I had no time to prepare, could not sleep, and truly felt sick, but was concerned the State may think I had the plague, Covid-19. Objxn-Ex-EE. I attended the hearing without being afforded an opportunity to prepare, and present my case, call witnesses, perform discovery or even to be human to care for my recovery because I did not want to be held in contempt. I made a special appearance preserving my objections to improper notice, lack of subject matter jurisdiction due to the Delaware Supreme Court's apparent participation in inciting the case, and

to object on substantive and procedural Due process and Equal Protections grounds for the disparate treatment against me during the proceeding, and in inciting the proceeding. Objxn.-MOL.

The State knew I was exhausted, recovering from the shingles, lacking of sleep, without being afforded a fair opportunity to prepare and present my case. They did not care about me, or my personal health or my lack of a fair opportunity to present my case for my sake. They appeared to hope I would get sick to use it against me.

I attended the hearing by phone since I had no working computer. Objxn-Ex-GG, D.I. 55-56. Upon receipt of the transcript, I objected, and I object again as the transcript does not accurately reflect my testimony. The reporter placed words that I did not say in my mouth. Objxn-Ex-AA, BB, CC. It appeared the state set me up. I filed corrections, which in no way make the transcript completely accurate. Id.

Kathleen, did not participate in this action until after the hearing. She relies on the inaccurate transcript I object to, and demeans me for my lack of a working computer and poverty, as evidence of disability. I am so poor I did not have a phone until sometime in January 2022. My computer did not work at the time of the hearing, and my backup computer also malfunctioned. My confusion as to why the computer was not working was absolutely genuine, and not evidence of a disability.

Kathleen's bad faith, or at best ignorant, attacks display her cold heartless indifference towards the substantial burden poverty has placed upon my defense of exercise of fundamental rights in this case.[48] "[A]t all stages of the proceedings the Due Process and Equal Protection

[48] *Abdul-Akbar v. McKelvie*, 239 F.3d 307, 317 (3d Cir. 2001);

Clauses protect [indigent persons] from invidious discriminations" *Lewis v. Casey*, 518 U.S. 343, 370 (1996) "Because this case implicates the [Constitutionally protected] right of access to the courts," and other fundamental rights, the government's disparate treatment towards me, based on poverty, is still unconstitutional under a strict scrutiny basis test. Citing, *Tennessee v. Lane*, 541 U.S. 509, 533 n.20 (2004).[49]

The Record shows the Court denied me an opportunity to be heard, until it was too late, until violations of my First Amendment rights already occurred. Objxn-Ex-R2, V. The Delaware Supreme Court also indicated it made a determination on my defenses before affording me an opportunity to be heard by deeming my claims for an opportunity to prepare and present a case, perform discovery and call witnesses, as frivolous before their assertion, preventing a fair and impartial opportunity to be heard at the hearing, preventing discovery, colluding with the state in the fixed proceeding against me. Objxn-Ex-V It is notable that both the Board and the court waited until two or three days prior to the hearing to address any matter while ignoring motions, leaving them unanswered.

The proceeding must be dismissed as the Board and the Court both violated my substantive and procedural due process rights in the Board proceeding in bad faith, with objective partiality towards the government, and prejudice against me.

The Third Circuit held, "A judgment may also be void if a court "acted in a manner inconsistent with due process of law."[50]

[49] *Lewis v. Casey*, 518 U.S. 343, 370 (1996); *Murray v. Giarratano*, 492 U.S. 1, 18 (1989)
[50] *Constr. Drilling, Inc. V. Chusid*, No. 03-3786, 2005 WL 1111760, at *3 (3d Cir. May 11, 2005). See Respondent's Exhibits to the Hearing ("R-Ex") Exhibits 35, 37 Part 2, 42, R 44

IV The Court lacks subject matter jurisdiction for apparently inciting the prosecution, and concealing beneficial evidence in bad faith to prejudice me with partiality to the government to fix the proceeding against me in violation of the Procedural and Substantive Due Process Clause pursuant to the State under the First and Fourteenth Amendments

The record shows the Delaware Supreme Court through its agents participated in inciting the proceedings against me, acting as witness, prosecutor and judge, and by concealing evidence by 1. inciting the Court's arms to attack me in *Kelly v Trump*, and the present disciplinary proceeding, 2. collaborating with the Chancery Court and directing Delaware Supreme Court employee Mrs. Robinson to sign off on the departure information of one or two of the former Chancery Court staff workers with information material to my state case, who appeared to lose their jobs, while preventing my opportunity to perform discovery or subpoena the two concealed witnesses, and 3, by eliminating some of the petitions for which the Defendants allege to bring the State action against me, placing them under seal, without notice to me a party, and without lawful reason, such as sensitive information relating to social security or bank accounts, to cover up the Court's and State's lawless acts, with knowledge these petitions are relevant to my defense and the federal proceeding.

Eliminating truth or evidence guarantees injustice. It is my religious belief courts exists to correct and guide those misguided by business greed, profit, position, and power, who sacrifice the lives, health and liberty of others for material gain, essentially selling souls to gain the world, only to lose their own eternal soul by the sin against the holy spirit, hardness of hearts from caring to think, to know, to love others unless it affects them.

Eliminating evidence hides the truth, or diverse views, allowing only the government-backed private partners' and public views to be protected under the Constitution.

The State seek to eliminate me, just as they cover up wrong doing by eliminating witnesses, forcing them to lose their jobs, under the deception of looking after them, only to look after the mere appearance of justice, not actual justice, and by concealing and sealing my pleadings. The Delaware Supreme Court justices do not care to uphold the fundamental rights of those in my class of one, of a person with unique religious-political beliefs which do not conform to the majority's, the individuals within the ODC and/or the judges on the Delaware Supreme Court.

Eliminating people who petition the Court, as "mentally disabled" for thinking the Court would care to help someone who is poor, or who believes in Jesus Christ or diverse political views in that I seek to care for humanity not control them through money, is disparate treatment based on protected view point, in violation of the Equal Protections Clause applicable to the State pursuant to the First and Fourteenth Amendment. US Amend I, and XIV.

The Delaware Supreme Court incited the State's petition, and concealed my religious-political petitions in bad faith with partiality towards the ODC. Joann and the Clerk of Court at the Delaware Supreme Court admitted that the Court sealed two motions, and Exhibits A-4, and A-5, in *Kelly v Trump*, relating to the Court and its agents' disparate treatment towards me. None of the sealed documents contained sensitive information.[51] **(Exhibits F, G)** This was not for my protection or the protection of the parties, but was to cover up Court misconduct, just as

[51] DI 62-72

the state seeks to eliminate me to conceal government misconduct by labeling me disabled, disparaging my reputation, to deem me not credible. [52]

The Delaware Supreme Court participated in eliminating potential material witnesses by having an agent sign off on the departure forms for two Chancery Court employees, Arline Simmons and Katrina Kruger. The Court colluded to conceal two people with first hand-knowledge of the facts of this case, despite my motion to subpoena one. [53]

I want the court to stop eliminating documents and witnesses, and do not want the court to eliminate the clerk who raised her voice at me on June 2, 2022, while confirming there was no motion to seal petitions. The court staff who yelled at me in the Chancery Court are gone, no longer employed with the Court, and that breaks my heart.

Covering up mistakes by eliminating those who make them is not correction but concealment, allowing it to be ignored not lovingly corrected. The State seeks to eliminate me to conceal its own wrongs instead of learning from them. [54]

The State's elimination of four sealed and concealed docket items and the elimination of two material witnesses from availability through process by service to the Chancery Court is relevant to my defense of retaliation, discriminatory motive, discriminatory purpose, with a discriminatory outcome made to chill my religious-political speech by demeaning my character as disabled, and threatening my bar licensure's status for exercising political-religious speech, contained in petitions, or outside the petitions, which the government disagrees with, based on religious-political viewpoint.

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[52] . Objxn-K-Ex-31 See letters of recommendation on my behalf concerning my reputation.
[53] Objxn-Ex-T-U-U-2-V.
[54] Objxn-MOL

The Court must dismiss the Petition and Board's recommendation because of its own unclean hands, to uphold actual justice, not the mere marketing and appearance of an illusion in this case. Justice is not a business. The exercise of Constitution liberties is not for sale. Otherwise only the wealthy, well connected, and powerful have something to exchange. Leaving the poor, including me, not free, but for sale, having only our own soul to sell in exchange by indebtedness, which violates my religious beliefs, to exercise what are not liberties, freedom of conscience, belief, speech, association, exercise and petition.

V. The Delaware Supreme Court lacks subject Matter Jurisdiction for procedural and substantive due process violations in causing the petition and for maliciously violating my due process rights during the Board proceeding.

The Delaware Supreme Court lacks subject matter jurisdiction by its 1st and 14th Amendment substantive and procedural Due Process violations based on its prejudicial treatment in inciting the petition, and disparate treatment during the proceeding.

The Court disregarded my religious beliefs against appointment of counsel, requiring I file multiple pleadings to fight against government compelled violations against my religious beliefs.[55] The Court disregarded my motion concerning the ODC's fraud, committed in bad faith by lying, seeking to commit fraud, concerning receipt of my answers.[56] The Record shows the Court denied me an opportunity to be heard, until it was too late, until violations of my First Amendment rights already occurred.[57] The Delaware Supreme Court also indicated it made a determination on my defenses before affording me an opportunity to be heard by deeming my

[55] Objx-Ex-I-P-2
[56] Objxn-Ex-L
[57] Objxn-Ex-R, R-1, R-2, S,

claims for an opportunity to prepare and present a case, perform discovery and call witnesses, as frivolous before their assertion, preventing a fair and impartial opportunity to be heard at the hearing, preventing discovery, colluding with the state in the fixed proceeding against me. It is notable that both the Board and the court waited until two days prior to the hearing to address any matter while ignoring motions, leaving them unanswered.

VI. The State abused its discretion by Vindictive prosecution

The record shows no legitimate objective reasons to bring the petition against me, or to deem me disabled or a danger to the public as an attorney with an active license to practice law. The State brought the petition against me with animus, to cover up state lawless acts, and to punish me for my religious-political speech and beliefs contained in my petitions.

The record does not support I am suffering from a physical or mental condition adversely affecting my ability to represent others in the practice law. I am reasonably and foreseeably emotionally distressed by the State's unconstitutional application under the color of the DLRDP, as applied to me for my exercise of religious-political speech, petitions, exercise, association and beliefs.[58]

The state discriminates against me by seeking to take away my active license to practice law based on disdain for my personal-religious-political petitions reflecting my beliefs, speech, association and exercise, essentially persecuting me for all these fundamental rights in violation of my substantive and procedural Due Process rights. The ODC admits it brings this petition

[58] *State v. Holloway*, 460 A.2d 976, 978 (Del. Super. Ct. 1983) "Though the law itself be fair on its face and impartial in appearance, yet, if it is applied and administered by public authority with an evil eye and an unequal hand, so as practically to make unjust and illegal discriminations between persons in similar circumstances, material to their rights, the denial of equal justice is still within the prohibition of the constitution."

based on my religious-political petitions per its August 23, 2021 letter and religious beliefs it finds illogical, per the petition at number 7, is "evidence of the prosecutor's retaliatory motive to prove actual vindictiveness." (Exhibit D and E, attached hereto).[59]

The District Court held in *U.S. v. Roberts*, 280 F. Supp. 2d 325, 30-31 (D. Del. 2003)

> The Due Process Clause… "protects a person from being punished for exercising a protected statutory or constitutional right." *United States v. Goodwin*, 457 U.S. at 372. The Supreme Court has held that "while an individual certainly may be penalized for violating the law, he just as certainly may not be punished for exercising a protected statutory or constitutional right." *Goodwin*, 457 U.S. at 372; *Blackledge v. Perry*, 417 U.S. 21, 28-9 (1974). To punish a defendant because he has done what the law permits is a due process violation. *Bordenkircher v. Hayes*, 434 U.S. at 363; *United States v. Andrews*, 633 F.2d 449, 457 (6th Cir. 1980); *States v. Paramo*, 998 F.2d 1212, 1220 (3d Cir. 1993).

The government did not meet its burden by providing, objective legitimate reasons for its conduct. The government's justification is pretextual. Actual vindictiveness has occurred in my case. Id

The Third Circuit held, "it is an elementary violation of due process for a prosecutor to engage in conduct detrimental to a … defendant for the vindictive purpose of penalizing the defendant for exercising his constitutional right to a trial," as I exercised in *Kelly v Trump*. *U.S. v. Paramo*, 998 F.2d 1212, 1219 (3d Cir. 1993).

The Court must presume vindictive prosecution that deprived me of due process in this case, requiring dismissal of the petition against me, since ODC admitted it prosecutes me in retaliation for my personal-religious petitions and personal-religious beliefs. (**Exhibits E, F**) [60]

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[59] Citing, *U.S. v. Reynolds*, 374 F. App'x 356, 361 (3d Cir. 2010), Objxn-Ex-P-internal-Exhibit-A, Ex-P-Internal-Exhibit-A-part 2, Ex-H.

[60] *United States v. London*, No. 15-1206, at *5 (3d Cir. Aug. 31, 2018); *United States v. Stafford*, No. 19-3833, at *14 (3d Cir. Dec. 20, 2021); (*U.S. v. Reynolds*, 374 F. App'x 356, 361 (3d Cir. 2010) "Prosecutorial vindictiveness may be found when the government penalizes a defendant

The Third Circuit in *U.S. v. Paramo*, 998 F.2d 1212, 1220 (3d Cir. 1993), held, "The presumption of vindictiveness is a prophylactic rule designed to protect a defendant's due process rights where a danger exists that the government might retaliate against him for exercising a legal right." See *Bordenkircher*,434 U.S. at 363, 98 S.Ct. at 667-68; *United States v. Esposito*,968 F.2d 300, 303 (3d Cir. 1992)

The District Court in *United States v. Figueroa*, Criminal No. 14-00672 (SRC), at *16 (D.N.J. Apr. 26, 2021) cited the Third Circuit while holding,

> "A presumption of vindictiveness can only be adopted "in cases in which a reasonable likelihood of vindictiveness exists[,]" that is when "the situation presents a reasonable likelihood of a danger that the State might be retaliating against the accused for lawfully exercising a right." *United States v. Esposito*, 968 F.2d 300, 303 (3d Cir. 1992).

Here, the ODC admits to be retaliating against me for lawfully exercising my rights, by my religious beliefs, reflected in my speech, contained in my petitions, in violation of the First and Fourteenth Amendment, with no other objective reasonable evidence on the record to sustain a judgment of disability, evidencing actual animus to rebut its animus. **Exhibits A, B**; *United States v. Esposito*, 968 F.2d 300, 303 (3d Cir. 1992); *U.S. v. Korey*, 614 F. Supp. 2d 573, 582 (W.D. Pa. 2009).

"Vindictive prosecutions in response to a defendant's exercise of protected statutory and constitutional rights are…prohibited." *Anderson v. Metzger*, Civil Action No. 16-174-CFC, at *17 (D. Del. Dec. 14, 2018); See *United States v. Goodwin*, 457 U.S. 368, 372 (1982).[61]

for invoking legally protected rights."); United States v. Hollywood Motor Car Co., 458 U.S. 263, 273-74 (1982).

[61] *U.S. v. West*, 312 F. Supp. 2d 605, 617-18 (D. Del. 2004); *Citing, United States v. Schoolcraft*, 879 F.2d 64, 67 (3d Cir. 1989).

Kathleen's vain arguments by repeating DLRDP Rules that applied to other proceedings, but not mine, or pointing to the Board's bad faith conclusions based on its own partial participation in the fixed proceeding against me where the Board denied me equal protection and substantive and procedural due process rights fails as a matter of clear error of law. US Amend I, XIV.

Kathleen claims "the religious provisions of the US and Delaware Constitutions do not prohibit the Court acting through the Board, from proceeding with disability action against [me] based upon [my alleged] incapacity to practice law." KV-Pg-32 The US Constitution certainly does prohibit this disability proceeding, in my case. Since the state claims my religious-political petitions, displaying religious-exercise, religious-speech, religious-association and religious-beliefs is the insidious reason for a claim of disability. The Court through its arm, the Board, does not have subject matter jurisdiction to regulate my exercise of fundamental rights, including the right to bring personal-religious-political petitions, when the Court disagrees with my religious-political beliefs under the sham of respondent's practice of law. This Court may not regulate religious speech and religious beliefs under the shield of regulating business, the profession. The Courts must not sell fundamental rights, in exchange for professional licenses, making those who work for money less free by government backed private partners, sacrificing individual liberties, the free exercise of religious belief in Jesus, in exchange for the right to buy and sell.

Kathleen's wrongly asserts the Court has the authority to order the examination of my person, in violation of my religious beliefs and exercise, while the State ignored my motions relating to religious objections to health examinations and mental health examinations. Objxn-K, paragraphs Obxn-Q There is no legitimate interest or compelling interest somehow more

important than my exercise of fundamental liberties, narrowly tailored to uphold such interests in this partial proceeding to compel me to violate my religious beliefs and exercise by such examinations. Mental and physical examinations are against my religious beliefs and exercise. Id.

Kathleen's citation to an abrogated case *Middlesex*, merely related to procedural due process concerns relating to lapse of time, is distinguished from my case. *Middlesex Cnty. Ethics Comm. v. Garden State Bar Ass'n*, 457 U.S. 423, (1982); *Abrogation Recognized by Harmon v. Department of Finance*, 3rd Cir.(Del.), April 27, 2020; *Citing, Sprint Communications, Inc. v. Jacobs*, 571 U.S. 69,(2013), *Malhan v. Sec'y U.S. Dep't of State*, 938 F.3d 453, 462 (3d Cir. 2019).

My case relates to the State's prosecution against me for my exercise of genuinely held religious-beliefs, religious-political speech, religious-political-association, and the right to petition the courts when I believe there has been a grievance against me by a government agent, no matter my poverty, religious beliefs, or political orientation.

Kathleen's arguments that a determination against me would not impede on my religious worship fails too. The practice of law is a religious exercise, not done for mere pay. *Amos* 5:15, *Matthew* 23:23. I ran for office to draft just decrees and drafted 5 proposals to impeach President Trump, without pay, to help the oppressed in accordance to God's will which teaches justice with mercy, not money, saves lives and eternal lives, by correction to prevent condemnation.[62]

[62] Objxn B-2, K-Ex10-11, Objxn-Ex-N, *Tate v. Cubbage*, 210 A.2d 555, 557, 1965 Del. Super. LEXIS 67, *1, 58 Del. 430, 433, ("It is no business of courts to say that what is a religious practice or activity for one group is not religion under the protection of the First Amendment. Nor is it in the competence of courts under our constitutional scheme to approve, disapprove, classify, regulate, or in any manner control sermons delivered at religious meetings.")

The Court's transfer of my license to disability inactive violates my free exercise of religion, as punishment for my personal-religious-exercise, speech, association, petitions, and beliefs.

My Constitutionally protected religious-political beliefs are in issue as the source of the vindictive prosecution against me brought to punish me for the exercise of religious liberties which the state, and government backed private partners' and professions, disagrees with. I am being persecuted for believing in Jesus Christ and my personal political beliefs. It is my religious-political belief that the government and the courts are in danger of being overthrown by the elimination of the dollar, a planned, preventable, reversible, economic crash to eliminate the governments' function by a takeover by private partners through a collective group of private central banks, including the Federal Reserve. [63]

KV asserts my political-religious beliefs and concerns by the pleas relating to the World Economic Forum's Founder's plan to crash the global economy were not relevant to the proceeding, and wrongly asserts I admit my concerns about lawlessness are not relevant, is misleading. My religious-political beliefs are in issue and are relevant, as the source of insidious government persecution against me and my property interest in my license to practice law. My pursuit of justice and just decrees are relevant, as I corrected myself on the record. (See transcript 46, 42-44) My love for others beyond my own, and my concern at compelled, controlled oppression, injustice and unjust decrees show I am an aide, not a danger to the public. 46. The record shows my conduct, caring for others, and standing up for those without opportunity are relevant in how my conduct as an attorney is beneficial to the public, not a threat to society. Id.

[63] Objxn-B-2, K-Ex-12-13-14-15-16-17-18-19

There is evidence the Great depression was planned unnatural by bankers who gain more profit and debt control the worse off the government and the people are. Objxn-Ex-K-internal-Ex-I8. I showed the Court evidence of a planned elimination of the dollar, and a planned by design economic crash, which this Court has the authority to prevent or reverse, no matter what some misguided expert opines. Objxn-Ex-K-Ex 12, 13, 14, 15, 16, 17, 19, and Objxn-GG.

Although the State seeks to destroy my life, by taking away my liberty under the threat of government persecution for exercising fundamental rights, and my ability to buy and sell for not worshipping what I believe to be the mark of the beast, the profession, business greed, this court is my hope of a hero of a planned elimination of the dollar, global economic crash, and way of government. I alerted the Court on how to prevent or reverse the crash. Objxn, page 47, 51-52; Objxn-F, G, H, GG. I should not be disciplined for my religious-political beliefs and speech, even if this State rejects myreligious-political beliefs and personal religious concerns.

The State abused its discretion by Selective Prosecution

I have met my burden of proving by clear evidence the State abused its discretion by selective prosecution "to overcome the regularity that attaches to decisions to prosecute," which is not rebutted by the record.[64] Kathleen's and the Board's vain assertions," rests upon clearly erroneous findings of fact, an errant conclusion of law, and an improper application of law to fact." [65]

[64] United States v. Wood, Criminal Action No. 20-56 MN, at *4-5 (D. Del. July 20, 2021); Citing, United States v. Taylor, 686 F.3d 182, 197 (3d Cir. 2012)
[65] *United States v. Gist*, 382 F. App'x 181, 183 (3d Cir. 2010)

"Although prosecutors enjoy wide discretion, they may not prosecute based on a defendant's "race, [political affiliation] or other arbitrary classification." United States v. Gist, 382 F. App'x 181, 183 (3d Cir. 2010).

A "selective-prosecution claim is not a defense on the merits to the criminal charge itself, but an independent assertion that the prosecutor has brought the charge for reasons forbidden by the Constitution." *United States v. Armstrong*, 517 U.S. 456, 463 (1996).

The Unites States Supreme Court in *United States v. Armstrong*, 517 U.S. 456, 464-65 (1996) held,

> a prosecutor's discretion is "subject to constitutional constraints." *United States* v. *Batchelder*, 442 U.S. 114, 125 (1979). One of these constraints, imposed by the equal protection component of the Due Process Clause of the Fifth Amendment, *Bolling* v. *Sharpe*, 347 U.S. 497, 500 (1954), is that the decision whether to prosecute may not be based on "an unjustifiable standard such as race, religion, or other arbitrary classification," *Oyler* v. *Boles*, 368 U.S. 448, 456 (1962). A defendant may demonstrate that the administration of a criminal law is "directed so exclusively against a particular class of persons . . . with a mind so unequal and oppressive" that the system of prosecution amounts to "a practical denial" of equal protection of the law. *Yick Wo* v. *Hopkins*, 118 U.S. 356, 373 (1886).

The Record shows a colorable basis (1) I have been singled out for prosecution while "persons similarly situated, [based on religious-political lawsuits deemed frivolous] have not been prosecuted [by the ODC,]" for the same type of conduct, and (2) the State's discriminatory prosecution of me has been invidious and in bad faith, that is, deliberately based upon impermissible considerations including religion, poverty, political-affiliation and religious-political protected speech contained in petitions, to prevent me from exercising fundamental

rights of religious-political-petitions, religious-political-beliefs, religious-political-exercise, religious-political-association, and religious-political-speech. [66]

The State's prosecution against me is made in retaliation for my personal-religious-political-petitions, reflecting personal religious-political-beliefs, including religious-political-speech and association in *Kelly v Trump* and for bar dues. The application of the DLRDP, as applied to me, violates my First Amendment fundamental liberties, applicable to the state pursuant to the Fourteenth Amendment, against me, as a party of one, as an indigent, lawyer with personal, unique religious-political beliefs under the Equal Protections Clause.

proceeding against me to punish me for my religious-political beliefs.

The record clearly shows the State had a discriminatory purpose, to selectively prosecute me for my religious-political exercise of fundamental rights.

I found no evidence of any other party or member of the Bar indicating anyone has ever been prosecuted for a RFRA claim, to alleviate a substantial burden upon exercise of religion. I am solely selectively being prosecuted.

My transfer to disability would have a discriminatory effect by chilling me, and potentially other professionals from exercising fundamental rights, which the majority or the profession as a whole may disagree with, thereby stifling freedom of thought, critical thinking, and debate, dumbing down professionals and experts by the mob reign of professional trained lusts replacing the hope of the impartial rule of law.[67] Deeming me disabled for suing the President of the United States, shows that the State believes the powerful are protected by the

[66] *U.S. v. West*, 312 F. Supp. 2d 605, 618 (D. Del. 2004); *State v. McGuiness*, ID 2110001942, at *4 (Del. Super. Ct. Apr. 13, 2022); *Albury v. State*, 551 A.2d 53, 61 n.13 (Del. 1988);
[67] *United States v. Schoolcraft*, 879 F.2d 64, 68 (3d Cir. 1989).

law, but the poor or those with religious beliefs in God, not worship of money as savior, are not. Other indigents and others with religious beliefs the State rejects, may be chilled from exercising their free speech, religious beliefs, religious exercise right to petition out of fear of being be deemed disabled, or similarly economically persecuted, for assuming the Constitutional protections afford them equal rights too. Deeming me as disabled for suing the government to dissolve the establishment of government religion which has placed a substantial burden upon my exercise of religious beliefs because the state disagrees with my belief in God as savior not what I believe is the mark of the antichrist, the profession as God or guide, its purpose to gain money, business greed or money as savior, shows the state protects religious viewpoints which conform to its will, rendering free will, and freedom to believe to only those who believe in like matter with the State or its government backed partners, such as the Disciplinary counsel who appears to care about sacrificing the Constitutional law to serve the profession's appearance, profit and prestige, not the public. I believe what they fight for is lawlessness, sacrificing constitutionally protected liberty, lives and health to serve their profession, essentially sacrificing other people's souls to serve their own conditional interest with no unconditional love in them like a pack of wolves pretending to be shepherds.

Those who serve money, or whose focus is on making money and the economy and jobs, serve greed, not their country, misleading their people to harm by controlling the people instead of caring for them by protecting their liberty.

True justice, is laying down conditional interests, in comfort, costs, convenience, to serve, by choosing to independently think, caring to know, in order to love, protecting even those you may be correcting by improving the world, not condemning it.

The State abused its discretion in seeking to prosecute me for my religious-political petitions. The State engaged in selective and vindicative prosecution with animus and bad faith by seeking to deem me mentally disabled, to deem my faith in God as guide, not money as guide, as a disability, and to conceal the State misconduct against me in this proceeding.

The record clearly provides evidence of discriminatory effect and discriminatory intent. Objxn, MOL. *United States v. Bass*, 536 U.S. 862 (2002)

I am not disabled for asserting the President and the courts adhere to the Constitutional rule of law by seeking to dissolve the establishment of government religion. Neither the courts, nor the president is above the law, nor should a citizen, I, be adjudicated as mentally disabled, but for, the conduct of bringing a lawsuit against government agents when I believe the agents committed a grievance against me. Winning or losing is not the standard. Otherwise half the parties would be deemed mentally disabled. I believe this court erred as a matter of law in deeming my material arguments to dissolve executive orders, which establish government religion based not on freedom, but bartered business, as frivolous in *Kelly v. Trump, 256 A.3d 207* (2021) for the reasons contained in the attached Order. (Exhibit H).

The Disciplinary proceeding is brought, in part, to suppress free speech to cover up State misconduct, by defaming my character and reputation as uncredible, and to discriminate against me based on my religious-political viewpoint, with no important interest unrelated to the suppression of free speech, and my exercise of fundamental rights, and without using the least restrictive means narrowly tailored to meet any legitimate interest. [68]

[68] *Wayte v. United States*, 470 U.S. 598, 599 (1985); *United States v. O'Brien*, 391 U.S. 367 (1968); *Arcara v. Cloud Books, Inc.*, 478 U.S. 697, 707 n.4 (1986); *Nieves v. Bartlett*, 139 S. Ct. 1715, 1721, 1722, 1729 (2019)

The Board of Professional Responsibility's ("Board") Report ("Report") must be rejected, and the Delaware Supreme Court must dismiss this petition. The ODC failed to present and the Board failed to find by clear and convincing **evidence** I am incapacitated from continuing to practice law. The Board's findings in this fixed, sham proceeding in partial colluding forums must be rejected as a matter of law, and as a matter of fact to prevent manifest injustice.

Further the State fails to achieve a compelling or overriding government interest narrowly tailored, using the least restrictive means, to meet that interest to discipline me for the exercise of Constitutionally protected conduct, including but not limited to my religious-political petitions, religious-political speech, religious-political association, religious-political beliefs and religious-political exercise by demeaning my character, and preventing me from seeking to return to my former job, rendering me potentially unemployable as "disabled," during an impending economic global recession and potential depression, where the unemployment rate is schemed to be about 47 percent in the US. Objxn-K-Ex-16.

Wherefore, I pray this Court rejects the Board's decision and dismisses this matter with prejudice.

June 7, 2022 Respectfully submitted,

_____

Meghan Kelly, Esquire
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
(302) 493-6693
Bar No. 4968

22-45 Fw: proof the Court wrongfully sealed my petitions averring Court misconduct and violations of my right to petition to compel me to forgo my lawsuit against Trump and to conceal evidence in my favor in the DE Disciplinary proceeding and reciprocal proceedings (file and serve)(reach out to Jason on claim No)Re: Meghan Kelly/Delaware Supreme Court/ Question dates sealing and unsealing...

From: Meg Kelly (meghankellyesq@yahoo.com)
To: gail_olson@paed.uscourts.gov; chambers_of_judge_paul_s_diamond@paed.uscourts.gov
Cc: meghankellyesq@yahoo.com; david.weiss@usdoj.gov
Date: Friday, June 30, 2023 at 02:21 PM EDT

----- Forwarded Message -----
From: Jason Gonzales <jgonzales@fileandserve.com>
To: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Wednesday, November 16, 2022 at 03:27:07 PM EST
Subject: RE: (file and serve)(reach out to Jason on claim No)Re: Meghan Kelly/Delaware Supreme Court/ Question dates sealing and unsealing...

Hi Ms. Kelly.

I've gathered the information you requested. The Access Type reflects the security status of the transaction document and the Submit Date reflects the date the Access Type was updated.

CASE 119,2021

Transaction ID 66649842, docket item 21.

Submit Date	Review Status	Reviewer	Reason	Comment	Document Type	Document Title	Access Type	Statutory Fee
May 17 2022 8:21AM EDT	Accepted (6/2/2021)	28, Supreme Court			Motion - Other	Document entitled "Motion for recusal" filed by appellant. (283)(dja)	Public	$0.00
Jun 3 2021 8:36AM EDT	Accepted (6/2/2021)	28, Supreme Court			Motion - Other	Document entitled "Motion for recusal" filed by appellant. (283)(dja)	Sealed, electronic	$0.00
Jun 2 2021 11:55AM EDT	Accepted (6/2/2021)	28, Supreme Court			Motion - Other	Document entitled "Motion for recusal" filed by appellant. (dja)	Sealed, electronic	$0.00
Jun 2 2021 11:29AM EDT	Pending			Document created	Motion - Other	Document entitled "Motion for recusal" filed by appellant. (dja)	Sealed, electronic	

Transaction ID 66639035, docket item 16

Submit Date	Review Status	Reviewer	Reason	Comment	Document Type	Document Title	Access Type	Statutory Fee
May 17 2022 8:20AM EDT	Accepted (5/27/2021)	28, Supreme Court			Motion - Other	Document entitled "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 seems just" (documents received by email 5-25-21) (556) (dja)	Public	$0.00
May 27 2021 3:09PM EDT	Accepted (5/27/2021)	28, Supreme Court			Motion - Other	Document entitled "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 seems just" (documents received by email 5-25-21) (556) (dja)	Sealed, electronic	$0.00
May 27 2021 2:52PM EDT	Pending			Document created	Motion - Other	Document entitled "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 seems just" (documents received by email 5-25-21) (556) (UNDER SEAL)(dja)	Sealed, electronic	

Transaction item number 66667019, Docket Item 40, appendix A-4, Docket item 41 Appendix A-5.

Submit Date	Review Status	Reviewer	Reason	Comment	Document Type	Document Title	Access Type	Statutory Fee
May 17 2022 8:22AM EDT	Accepted (6/8/2021)	28, Supreme Court			Appendix	Appendix A-4. (dja)	Public	$0.00
Jun 8 2021 4:10PM EDT	Accepted (6/8/2021)	28, Supreme Court			Appendix	Appendix A-4. (dja)	Sealed, electronic	$0.00
Jun 8 2021 4:00PM EDT	Pending			Document created	Appendix	Appendix A-4. (dja)	Sealed, electronic	

Submit Date	Review Status	Reviewer	Reason	Comment	Document Type	Document Title	Access Type	Statutory Fee
May 17 2022 8:22AM EDT	Accepted (6/8/2021)	28, Supreme Court			Appendix	Appendix A-5. (dja)	Public	$0.00
Jun 8 2021 4:10PM EDT	Accepted (6/8/2021)	28, Supreme Court			Appendix	Appendix A-5. (dja)	Sealed, electronic	$0.00
Jun 8 2021 4:00PM EDT	Pending			Document created	Appendix	Appendix A-5. (dja)	Sealed, electronic	$0.0

Case 58,2022

Per the September 7, 2022 order in the first docket attached hereto, relating to Delaware Supreme Court matter IMO Meghan Kelly a member of the bar, the court ordered the case unsealed.

At the end of September, the Court contacted File & ServeXpress, where it was discovered that a configuration at the Case Class level was hindering the security setting in the case. Upon, File & ServeXpress's suggestion, the court updated the case type on September 29, 2022 which made most of the documents in the is case public on September 30, 2022.

Additionally, the court notified File & ServeXpress on October 5, 2022 that some case documents were not viewable at the Public Access Terminals and in CourtLink. It was discovered that some documents did not take to the case type update. The solution required intervention from our DEV OPS team who were able to resolve the issue. We delivered a resolution on October 6, 2022 that made all case document public.

I hope that helps.

Thank you.

Jason

Jason Gonzales
Manager, Account Management, File & ServeXpress
972-893-6632 jgonzales@fileandserve.com

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From: Jason Gonzales
Sent: Thursday, November 3, 2022 12:02 PM
To: Meg Kelly <meghankellyesq@yahoo.com>
Subject: RE: (file and serve)(reach out to Jason on claim No)Re: Meghan Kelly/Delaware Supreme Court/ Question dates sealing and unsealing matters/o 119-2021 and matter No 58-2022

Good afternoon Ms. Kelly.

I understand you have made phone calls to our Client Support team regarding sealing/unsealing docs in cases 119-2021 and 58-2022, respectively. I am diligently working to provide answers to your questions.

My goal is to have answers for you no later than EOD tomorrow, Friday, 11/4/2022.

I am your liaison for this matter. Please contact me should you have any questions.

Thank you for your patience while I work to provide answers to your questions.

Best regards,

Jason

Jason Gonzales
Manager, Account Management, File & ServeXpress
972-893-6632 jgonzales@fileandserve.com

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From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Tuesday, November 1, 2022 4:10 PM
To: Jason Gonzales <jgonzales@fileandserve.com>
Cc: Meg Kelly <meghankellyesq@yahoo.com>
Subject: (file and serve)(reach out to Jason on claim No)Re: Meghan Kelly/Delaware Supreme Court/ Question dates sealing and unsealing matters/o 119-2021 and matter No 58-2022

Hi Jason,

I just spoke with Kelly and placed a ticket item for the issues below, 156496.

Thank you for your help. I also sent in another email today.

Have a good night.

Very truly,

Meg

Meghan Kelly

34012 Shawnee Dr.

Dagsboro, DE 19939

meghankellyesq@yahoo.com

(302)493-6693

On Thursday, October 13, 2022 at 06:00:36 PM EDT, Jason Gonzales <jgonzales@fileandserve.com> wrote:

My pleasure, Ms. Kelly.

Let me do some research on our side to see what information we can glean.

Thank you.

Jason

Jason Gonzales
Manager, Account Management, File & ServeXpress
972-893-6632
jgonzales@fileandserve.com

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From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Wednesday, October 12, 2022 5:41 PM
To: Jason Gonzales <jgonzales@fileandserve.com>
Cc: Support <support@fileandserve.com>; Meg Kelly <meghankellyesq@yahoo.com>
Subject: Re: Meghan Kelly/Delaware Supreme Court/ Question dates sealing and unsealing matters/o 119-2021 and matter No 58-2022

Hi Jason,

Thank you so much. The court misbehaved by sealing and leaving documents unsealed to protect the court.

Are you able to provide dates documents were unsealed and sealed in both matters?

I have contacted the court. The court provided inaccurate information on the unsealing and sealing of documents in the two matter.

Thank you for the email indicating it is not file serve's fault or under your control.

Thank you,

Meg
Please forgive typos.

Sent from my iPhone

On Oct 12, 2022, at 4:52 PM, Jason Gonzales <jgonzales@fileandserve.com> wrote:

Good afternoon Ms. Kelly.

Our Support team forwarded your email to me. I can confirm that our platform is integrated with the Delaware Courts. Our system automatically updates when the court takes action on or changes the status of a case/filing/documents. File & ServeXpress does not assume the authority to seal and unseal documents.

I encourage you to contact the court should you have any questions about the security status of a case and/or a document(s).

Thank you.

Sincerely,

Jason

Jason Gonzales
Manager, Account Management, File & ServeXpress

<image011.png>

972-893-6632

<image012.png>

jgonzales@fileandserve.com

<image018.png>

<image013.png> <image014.png> <image015.png> <image016.png> <image017.png>

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From: Support <support@fileandserve.com>
Sent: Monday, October 10, 2022 1:19 PM
To: 'Meg Kelly' <meghankellyesq@yahoo.com>
Cc: Support <support@fileandserve.com>
Subject: RE: Meghan Kelly/Delaware Supreme Court/ Question dates sealing and unsealing matters/o 119-2021 and matter No 58-2022

Hello Ms. Kelly!

I have reached out to our team to provide some clarify for your inquires below, and will follow up with you before the end of the day with additional information.

<image001.gif>

Client Support JR, File & ServeXpress

<image002.png>

888-529-7587

<image003.png>

<image009.png>

support@fileandserve.com

<image004.png> <image005.png> <image006.png> <image007.png> <image008.png>

<image010.jpg>

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From: Meg Kelly <meghankellyesq@yahoo.com>
Sent: Monday, October 10, 2022 12:01 PM
To: Support <support@fileandserve.com>
Cc: Meg Kelly <meghankellyesq@yahoo.com>
Subject: Meghan Kelly/Delaware Supreme Court/ Question dates sealing and unsealing matters/o 119-2021 and matter No 58-2022

Good morning,

Per the September 7, 2022 order in the first docket attached hereto, relating to Delaware Supreme Court matter IMO Meghan Kelly a member of the bar, the court ordered the case unsealed. Did the Court process the request on September 29, 2022, and did it go through on September 30, 2022?

In the second docket attached hereto, case number 119, 2021, Case name Meghan Kelly v Donald Trump, could you please provide the dates the following four documents were sealed and unsealed?

Transaction ID 66649842, docket item 21.

Transaction ID 66639035, docket item 16

Transaction item number 66667019, Docket Item 40, appendix A-4, Docket item 41 Appendix A-5.

Could you please confirm that Delaware Courts are an integrated courts. By integrated Courts I mean the courts are in charge of what is sealed and unsealed. File and serve does not assume the authority to seal and unseal documents by request. It is physically entered by the attorneys and courts.

I am a party in both cases.

Thank you,

Meg

Meghan Kelly

34012 Shawnee Dr.

Dagsboro, DE 19939

meghankellyesq@yahoo.com

THIRD CIRCUIT COURT OF APPEALS

MEGHAN M. KELLY,	§	APPEALS COURT
Respondent, Appellee	§	CASE NUMBER: 22-3372
	§	DISTRICT COURT
	§	Misc. No. 22-45
v.	§	DISTRICT COURT
United States District Court,	§	
Eastern District of Pennsylvania	§	Paul S. Diamond, Judge

Appellant Respondent Meghan Kelly's Motion for leave to exceed the word limit in her Motion for Reconsideration of Order dated June 30, 2023 denying stay under Rules 2, 40, 1st, and 5th Amendment asserted rights to prevent irreparable injury

I Plaintiff Appellant Meghan Kelly, pursuant to the Court's equitable powers and Federal Rules Appellate Procedure Rule 2, and any other applicable rule this Court deems just move this Court to permit me to exceed the word limit in Appellant Meghan Kelly's Motion for Reconsideration of Order dated June 30, 2023 denying stay under Rules 2, 40, 1st, and 5th Amendment asserted rights to prevent irreparable injury (hereinafter "motions").

1. I Meghan Kelly, for good cause, respectfully request, the Word limit be excused in the above captioned Motions.

2. I filed the motions under great duress, and have limited means and time to research. The amount of words I used is by Word check is 4,722.

3. I have another pleading due or waived by July 14, 2023. I do not know how I will get potentially 4 additional motions the next 3 days. I am trying to do so while not waiving my rights before your Honorable Court.

4. The amount of words I request I exceed the 3,900 limitation in my Motion for Reconsideration of Order dated June 30, 2023 denying stay under Rules 2, 40, 1st, and 5th Amendment asserted rights to prevent irreparable injury is 822.

5. This case arising from reciprocal discipline of a Delaware Order placing my license on inactive/disability relates to a petition I brought against former-President Donald J. Trump under the Religious Freedom Restoration Act to protect my exercise of belief in Jesus Christ without government sponsored persecution in the state of Delaware.

6. The Delaware original disciplinary case and this reciprocating case represents examples of government persecution based on my exercise of religious beliefs, contained in my speech in my petitions to the Delaware Courts.

7. In the August 23, 2021 letter DE Disciplinary Counsel indicated my religious beliefs contained in my speech contained in my private-religious petitions is the source of their concern of my mental fitness to practice law. In the DE ODC's petition at 7, the Disciplinary Counsel points to my references to the bible e, as evidence of a disability. Third Circuit Docket Items ("3DI") 3DI-3, page 34, and 3DI21-4.

8. This Reciprocal Order by Appellee is based on the Delaware Order I seek to overturn based on lack of subject matter jurisdiction since the DE Supreme Court acted as witness, judge and prosecutor's assistant.

9. This Court has inherent equitable powers over their process to prevent abuse, oppression, and injustice. *Gumbel v. Pitkin*, 124 U.S. 131 (1888). This Court must grant my request to prevent injustice by denial of words which essentially denies me the opportunity to be heard in defense of my religious speech reflecting my religious beliefs in my Freedom of Religion Restoration Act Complaint against former President Donald J. Trump. US Amend I, V. 3DI 21-4 pages 126 through 248.

10. This Court must grant my request for additional words to prevent government abuse against my person, oppression, and injustice. It is difficult for me to ask the Court persecuting me for my belief in Jesus, for help.

11. Nevertheless, the Constitutional issues must be addressed to protect not only me, but others beyond me from professional government backed persecution based on exercise of fundamental rights.

12. A professional's private exercise of First Amendment exercise of speech, association, religious belief, religious exercise, and the right to petition to defend the exercise of Constitutional freedom in their private capacity must not be eliminated in exchange for a mere license.

13. I must not be compelled to violate my religious belief by compelled religious violations of my belief in order to regain my license.

14. Nor should I be punished for my exercise of the right to access to the courts to defend my religious beliefs because the original disciplinary Court finds my citations to the Bible and religious beliefs contained in my speech in my private petitions illogical. See, *Brief of the Southern Baptist Theological Seminary, the Ethics & Religious Liberty Commission, the International Mission Board, and Dr. R. Albert Mohler, Jr. as amici curiae in Support of Petitions before the US Supreme Court by the Little Sisters of the Poor Home for the aged, Denver Colorado, et.al, Petitioners v. Sylvia Matthews Burwell, Secretary of Health and Human Serviced,* et. al, No.15-105, 2015 WL 5013734 (US).(The Court allowed references to the bible in other RFRA petitions); See, B*urwell v. Hobby Lobby Stores*, Inc., 573 U.S. 682, 682. ("Courts have no business addressing whether sincerely held religious beliefs asserted in a RFRA case are reasonable.") *Also see, Africa v. Pennsylvan*ia, 662 F.2d 1025, 1025 (3d Cir.), cert. denied, 456 U.S. 908 (1982); ("Judges are not oracles of theological verity, and the founders did not intend for them to be declarants of religious orthodoxy.); *Employment Div., Dept. of Human Resources of Ore. v. Smith*, 494 U. S. 872, 887, ("Repeatedly and in many different contexts, we have warned that courts must not presume to determine the place of a particular belief in a religion or the plausibility of a religious claim."); *Cantwell v. State of Connecticut,* 310 U.S. 296, 60 S. Ct. 900, 84 L. Ed. 1213 (1940); *Remmers v. Brewer*, 361 F. Supp. 537, 540 (S.D.Iowa

1973) (court must give "religion" wide latitude to ensure that state approval never becomes prerequisite to practice of faith); *Presbyterian Church in U. S. v. Mary Elizabeth Blue Hull Memorial Presbyterian Church*, 393 U. S. 440, 450, (1969) (holding that "the First Amendment forbids civil courts from" interpreting "particular church doctrines" and determining "the importance of those doctrines to the religion."); *Ben-Levi v. Brown*, 136 S. Ct. 930, 934; See, *Holt v. Hobbs*, 574 U.S. 352; In re Eternal Word Television Network, Inc., 818 F.3d 1122, 1140 (11th Cir. 2016)("The Supreme Court cautioned that "federal courts have no business addressing" such questions of religion and moral philosophy." (Internal citation omitted)); *Thomas v. Review Board*, 450 U.S. 707, 714 (1981), "religious beliefs need not be acceptable, logical, consistent, or comprehensible to others in order to merit First Amendment protection.").

15. "To be sure, a state may not condition the grant of a privilege, [a license,] or benefit upon the surrender of a constitutional right." *Minn. Ass'n, Health Care v. Minn. Dept., P.W*, 742 F.2d 442, 446 (8th Cir. 1984); *Citing, Western Southern Life Insurance Co. v. State Board of Equalization*, 451 U.S. 648, 657-58, 664-65 (1981); *Sherbert v. Verner*, 374 U.S. 398, 404-05, (1963).

16. "The doctrine that a government, state or federal, may not grant a benefit or privilege on conditions requiring the recipient to relinquish his constitutional rights is now well established." *Citing, Jones v. Board of Education*,

397 U.S. 31, 34 (1970); *E.g., Cafeteria Workers v. McElroy*, 367 U.S. 886, 894; *Sherbert v. Verner*, 374 U.S. 398, 404; *Speiser v. Randall*, 357 U.S. 513, 519-520; *Garrity v. New Jersey*, 385 U.S. 493, 499-500; *Kwong Hai Chew v. Colding*, 344 U.S. 590, 597-598; *Frost Trucking Co. v. Railroad Comm'n*, 271 U.S. 583, 593-594; *see Van Alstyne, The Demise of the Right-Privilege Distinction in Constitutional Law*, 81 Harv. L. Rev. 1439, 1445-1454 (1968); Comment, *Another Look at Unconstitutional Conditions*, 117 U. Pa. L. Rev. 144 (1968). As stated in *Homer v. Richmond*, 292 F.2d 719, 722: ("One may not have a constitutional right to go to Baghdad, but the Government may not prohibit one from going there unless by means consonant with due process of law.")

17. "Neither the state in general, nor the state university in particular, is free to prohibit any kind of expression because it does not like what is being said." *Jones v. Board of Education*, 397 U.S. 31, 35-36 (1970)

18. The United States Supreme Court in *Kennedy v. Bremerton School Dist.*, No. 21-418, at *15 (June 27, 2022) held, "Where the Free Exercise Clause protects religious exercises, whether communicative or not, the Free Speech Clause provides overlapping protection for expressive religious activities."

19. In that case, the Court granted a professional coach the right to exercise private religious belief and speech, indicating the state's punishment

violated the Coach's first Amendment right applicable to the state pursuant to the 14th Amendment, despite his association as a government employee or agent.

20. I must argue this case must be extended to me to prevent the state, federal government and additional governments' including Appellee's punishment of me, but for the exercise of my exercise of my religious belief, as outlined in my speech in my petitions, no matter how repugnant or illogical my religious beliefs appear to the state and Federal government.

21. Freedoms are not for sale, in exchange for professional licenses. When the courts make business the law, by making professionals the law, by self-regulating, money, not freedom, or the people, is protected. Individuals and individual liberty are instead sacrificed under the lie money grants freedom when it creates slavery by how it is coined.

22. I require more words to ask the Courts to exercise more of their power to prevent professionals from governing the nation as opposed to government elected or appointed impartial servants without a stake in the outcome against the accused, in terms of position or sustaining profit.

23. Additional words are needed not only to protect the Constitutional rights of the accused, but to improve the world, by allowed criticism, free speech, free enterprise, which helps professionals learn, and improve, not forced

conformity under the threat of secret proceedings against professionals who think or believe differently.

24. The Courts guarantee injustice by making business the law. Making professionals who exercise private rights, including their religious beliefs in jeopardy of losing their ability to buy and sell merely for not adopting the government's or government backed religious or secular belief in money and professional material gain and convenience as God and guide.

25. The Words are needed to argue, under the unique facts of this case in defense of my ability to buy and sell as a professional lawyer but for my exercise of my fundamental rights.

Wherefore, I pray this Court grants my motion.

July 11, 2023

Respectfully submitted,
/s/Meghan Kelly
Meghan Kelly, Esquire
DE Bar Number 4968
34012 Shawnee Drive
Dagsboro, DE 19939
meghankellyesq@yahoo.com
(302) 493-6693(1, 666Words) pro se

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: July 11, 2023

Meghan Kelly (printed)

Meghan Kelly (signed)