

APP 14

IN THE CHANCERY COURT OF THE STATE OF DELAWARE

Meghan Kelly,)

Civil Action No.: 2020-0809 PWG

Plaintiff)

v.)

The President of the United States,)

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.)

PLAINTIFF'S BRIEF IN SUPPORT OF HER EXCEPTIONS TO SPECIAL MASTER'S FINAL REPORT, DATED NOVEMBER 2, 2020

Dated: December 5, 2020

Respectfully submitted,

Meghan Kelly

Meghan Kelly
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Bar Number 4968
Pro Se
(Word Count 14,995)

NATURE AND STAGE OF PROCEEDING

This case arises as a result of President Trump's unholy-union of government-religion, directly causing, continuous, ongoing government sponsored suppression of my free exercise of religion, speech and association under the threat of government sponsored private and/or public persecution towards, me, a non-Trump supporting, liberal, Christian, Democrat whose views conflict with Defendant's perceived or projected views in religion and government.

I initiated this case for equitable, injunctive, declaratory relief, costs, and other relief that this Court deems just, equitable, and proper.”¹

On September 22, 2020, the Court granted my petition to proceed in forma pauperis and accepted the Verified Complaint, (attached hereto and incorporated fully herein, as Exhibit A), the Exhibits to the Verified Complaint, (attached

¹I included costs in case I retained an attorney. The Third Circuit granted “attorney’s fees for nominal damages and favorable judgment on merits of her Religious Freedom Restoration Act, 42 USCS § 2000bb” claim. Citing, annotation to, 42 USCS § 1988, the statute granting attorney fees, and *Abdi Jama v. Esmor Corr. Servs.*, 549 F. Supp. 2d 602, 2008 U.S. Dist. LEXIS 32943 (D.N.J. 2008), vacated, remanded, 577 F.3d 169, 2009 U.S. App. LEXIS 17950 (3d Cir. 2009).

I respectfully request to include nominal damages should the Court allow amendments to the complaint. See, *Freedom from Religion Found. Inc. v. New Kensington Arnold Sch. Dist.*, 832 F.3d 469, 490, 2016 U.S. App. LEXIS 14594, *49-50. Also see, *Molina v. Pa. Soc. Serv. Union*, 2019 U.S. Dist. LEXIS 120040, *27, 2019 WL 3240170.

hereto, and incorporated herein fully, as Exhibit B, internally labelled as Exhibits 1-9, outlined more specifically in the table of contents), together with Plaintiff's Motion for Temporary Restraining Order, (attached hereto, and incorporated herein fully, as Exhibit C), Plaintiff's Motion to Expedite, and Plaintiff's Memorandum of Law in Support of Plaintiff's Motion for Temporary Restraining Order and Motion for Expedited Relief, (attached herein, and incorporated fully, as Exhibit D).

Docket Item ("D.I.") D.I. 1-15, 19.

Within, the Verified Complaint, I referred to various newspaper articles or web sites I printed out, (attached herein, and incorporated fully, as Exhibit E, internally labelled Exhibits 10-42).

Attached, please find additional exhibits, (attached hereto and incorporated herein fully as Exhibit F, internally labeled Exhibits 43-54).

On or about October 5, 2020, I filed an Amended Complaint, simultaneously with, a Motion to amend the complaint to remove President Trump in his official capacity, and to indicate I may amend again should Vice President Biden get elected concerning arguments capable of repetition and evading review.² D.I. 27-34.

² Government citing to or accepting praise under John 15:13, and President's statements ending in "God bless America" for government glorification in place of God's is sin. My speech has been left restrained and unexercised as a result of

The Registrar issued subpoenas for Defendant President Donald Trump and US Attorney William Barr, but withheld the subpoena for the US Attorney for the District of Delaware, through the civil process clerk. D.I.35-36.

On October 12, 2020, I filed a Second Amended Complaint to include the United States as a party, as required under the Federal Rules of Civil Procedure. I also included the term President. Should Defendant not remain in office, I will seek to replace Defendant with President Biden under Rule 25. D.I.53.

On October 12, 2020, I filed a Motion to amend the amended complaint with a second amended complaint, and a corrective motion on October 13, 2020, (“Motion”). D.I.50, 60. In the Motion, I allude to the fact I may amend the Complaint again to seek to hold Ex. Or. No. 13798, 82 Fed. Reg. 21675, May 4, 2017, (“Executive Order”), unconstitutional. Yet, I feared it would slow down the case due to foreseeable interpleading by churches and religious organizations who make Jesus’s “father’s house into a marketplace.” Citing, John 2:16.

these specific government-religious beliefs based on deceptive propaganda, not truth, to mislead many, including government troops to violate Jesus’s teachings under the guise of following Jesus.

Just because presidents have been doing it for years does not mean it is right, or that somehow previous generations were smarter than us. We can learn from their mistakes, instead of repeating them, to come up with a more just, fair and free America today.

I believe the Executive Order misleads people I love to think the mark of the beast, also known as the evil eye, is good when it leads to harm in this life, and hell in the next without repentance. (See, Matthew 6:23, Mark 7:22, Proverbs 28:22 relating to evil eye).

I believe the evil eye is the focus on what people can get for themselves, their family or those who serve their interest without reflecting love towards those they seek worldly gain from. I believe people do evil by teaching charity, pro bono, fundraising, volunteering is good. I believe it damns people to hell by driving out love from the hearts of men, replaced with the love of money or business greed for worldly gain by barter or exchange. See Exhibit B, refer to Exhibit 2 relating to donations, volunteering, even gathering signatures serves Satan by violating Jesus in Matthew 6:1-4 misleading people to exploitation, harm and hell.

In Matthew 6:1-4, Jesus Christ says do not give seen. When you give charitable alms, do not know your left hand from your right, meaning do not give to get, no matter how small, including, trading favors, back pocket alleged good deeds, marketing, tax breaks, getting your foot in the door for a job, or the social aspect. All of these lead to harm, exploitation of those in need, and hell, by teaching people business greed is love, (the mark of the damned). Love is sacrificial, not getting, merely giving unconditionally. See, Matthew 10:8, "... You

received without paying, now give without being paid.” True charity is done in secret without reward, or it is not charity. It is just business. It is wickedly deceptive to say otherwise.

There is no shame in humbling yourself and asking for charity directly. I believe it is sin to ask on behalf of others under the guise of charity for self-gain, no matter how small, including praise of men and tax breaks. Organized charities and business fundraising violate Jesus Christ’s teachings. I believe school children fundraising for praise, pizza, or prizes, learn the way to hell, the mark of the beast, is love, giving to get is love. No, business by barter or exchange, even for praise or forced peer pressure to fit in, is business, not love. Love is unconditional. I believe all people should be respected unconditionally, unearned, regardless of race, religion or place of origin. Business is not the sin. I believe teaching business greed is love is sin. The bible teaches those who misunderstand go to hell, even children are damned to hell. See, Ezekiel 9:3-6, Luke 17:2, and John 3:1-14 to confirm children go to hell too.

Not knowing is not innocence regarding spiritual truth. It is guilt, per God. See Exhibit A at 93, Ephesians 4:18, Matthew 13, and Hosea 4:6, Acts 17:30, “In the past God overlooked such ignorance, but now he commands all people everywhere to repent.”

Teaching children young teaches them to praise their exploiters in congress, business and in charities who make individual gain off of the many, under the guise of serving them charitably, by seeking donations or giving items or money out for, in part, self-gain, via marketing, trading favors, good will or tax breaks, as they grow older. See, Isaiah 5:20.

I believe campaigning, fundraising, as well as organized charities and business and not for profit bail outs or incentives without strings attached to serve election seats is the source of our unjust and unenforceable laws. See Isaiah 10:1.

By allowing campaign finance via donations, officials in the executive and legislative branches are tempted to serve those who serve their seats, at the expense of those they are charged to serve. This is especially dangerous when they are tempted to serve religious groups who favor them, at the detriment of those who believe differently than such groups, for me, and people like me with diverse religious beliefs or for those with non-beliefs.

Some laws create the illusion of the law, but are unenforceable or are too burdensome for the injured to enforce, to the profit of those who fill the pockets of the politicians. Lawlessness seems to reign. Bad business should not be rewarded by the government. See Exhibit A at 236-292.

For example, the UCC is made to exploit customers. The manufacturers should bear the burden of risk relating to insurance to encourage them to create made to last, made to work products. The statute of limitations should be extended beyond 3 or even 10 years. Laws should not reward made to break, made to repair, or made to replace products or parts, which pollute and pick the pockets of the common man for bad services and products.

The various standards of care in business relate to professionals in an area, whose goal is to look after their own and to gain profit, not after the customer, leaving us with worse products and services under the guise of improved, sometimes with older versions no longer repairable as different, not better, versions or products are produced.

The libel and slander laws arguably chill free speech and should be ruled unconstitutional too. It allows the rich, powerful and well connected to sue truthful talkers into oblivion, or pay victims off in arbitration as they continue to harm others with products that break, kill or harm health, with no real correction from the courts.

To entangle the religious groups with this government corruption which benefits officials' pecuniary gain at the cost of losing freedom by protections under the law, would exacerbate the unholy-union of church and government to the

detriment of substantially burdening my free exercise of religion, speech and association more, especially with the threat of law suits in state courts under libel per se laws concerning business performed under the guise of religion to serve business greed, the mark of the damned, the whore, the beast. See Exhibit A, 157-211.

There is an increasing risk beneficial, just programs, like Medicare, Social Security, and welfare will be reduced, eliminated, or replaced with charity seen by churches or businesses for tax breaks, marketing or favors, I believe, misleading many more to hell by teaching them to love money driving out their love for humanity. (See Matthew 6:1-4). (Also see, Exhibits relating to my desire for just laws that care for the people, not exploit them to serve the profit of those with power, money and connections to increase the same at the common man's expense. Exhibit F at internal exhibits 43 and 46.

I studied education when I was at UD, and learned like many teachers B. F. Skinner's deceitful psychological theories. Exhibit F, Exhibit 43. He taught people merely conditionally care. They behave like loveless beasts, for rewards and avoidance of harm, what I believe is the mark of the damned, the beast, the whore, the unsaved. B. F. Skinner taught there is no such thing as unconditional love. B. F. Skinner is wrong. Jesus Christ teaches otherwise. I believe Jesus. I believe, but for B. F. Skinner's words many continue on the darkened path to eternal death,

well beyond his life time. Just like I believe many will be misled to hell beyond Trump's life time if the Courts do not place a check on the executive branch, to prevent lawlessness from reigning, everyone for themselves, their own, without regard for others, the horror, reflecting the image of Satan, "the lawless one." 2 Thessalonians 2:8-10.

One of the leading causes of death in middle school and high school kids is suicide, because teachers are taught to teach students to be workers and consumers, instead of teaching them they are valued and loved and to love one another, not to exploit each other to serve greed and gain, to somehow be worthy of love. (I believe reflecting the image of Satan). I believe people exist because they are loved period, and it is a great sin to harm their life, health or eternal life to serve business greed by barter or exchange. Exhibit A at 318.

I am disappointed in both the legislative branch and the executive branches. I believe they fail to check and balance each other since they appear to be focused on those who serve their seats.

The court should put its foot down, like a loving parent, to correct their misbehavior, to balance the branches out by recognizing, not ignoring, constitutional limits. To alleviate both the executive and legislative branches from oppressing the masses through unjust decrees or for bailing out businesses for bad

business, without strings attached, based on potential bribes called campaign donations or fundraising, the Honorable Court may consider removing the Matthew 6:1-4 violations which is the source of injustice, in a different case, by removing campaign financing and fundraising period, as a violation of 18 USC Section 201, and possibly the Thirteenth Amendment, since it enslaves the masses to pay off money used to buy support for their seats via business, not for profit and charitable bailouts without strings attached to serve.³ This Honorable Court has the power and authority, albeit in a different case, to remove the temptation of government officials to slaughter, (cutting the fat off of their labor), the sheep, (the constituents), they are charged to shepherd, (care for), in terms of requiring exploitation of their labor, and their pockets, to feed themselves and those who serve their seats, misbehaving like wolves. See Exhibit A, 91, Ezekiel 34:1-10,

³ I went through the painstakingly tedious ordeal of contacting representatives at the Department of Elections in all 50 states and districts to seek a waiver in case I should run for President, about two years ago, after I lost a state election. No state helped me with the exception of suggesting I collect signatures which also violates Jesus's teachings. See Exhibit B, refer to Exhibit 2 for an elaboration on how collecting signatures serves sin and leads to harm here. I tried to see if I could run for executive or legislative office without selling my soul to Satan, but failed. See, Exhibits F, Exhibits 50, and 51. So, here I am, asking you for help because I am helpless in seeking justice through the other two branches, at this time. I also drafted articles of impeachment and contacted all 541 federal congress members, but failed persuading them too. I believe not giving up is the winning strategy, per Jesus's teachings. See, Matthew 7:7-12, Luke 11:5-13, Luke 18:1-8, Galatians 6:9.

Zechariah 11:17, Jeremiah 50:6, Isaiah 53:6, Jeremiah 5:31, Jeremiah 23:11-15, Isaiah 9:16, and Isaiah 3.

On an aside, I am licensed to teach. Like many teachers I had to learn various behaviorists' and psychologists' theories, most of which violate my faith in Jesus to make profit off of those in pain, under the guise of good. Psychologists negate free will by environmental, chemical, behavioral, hereditary or familial causes of alleged mental illness, discouraging the use of the power we all have to use our mind to exercise free will, by teaching it does not exist. See Exhibit F, Exhibit 43, refer to my college transcript including psychology courses.

Instead mental health professionals appear to serve the way to hell by focusing on guiding people to feel better instead of allowing the holy spirit to make them feel bad to convict them to Godly concern, to think, to analyze, not ignore, to care, to love, when they see oppressors and businessmen behave like buzzards pecking at the flesh, the pockets and labor of others to serve their own family, and own people. The natural man reflects the image of Satan to be damned to hell. The spiritual man reflects the image of God by using their brain to think, to care, to love, God, themselves and one another more than convenience, greedy gain, gluttonous materialism, and good times. ⁴ See, 1 Corinthians 2:1-16 for a

⁴ There is a difference between worldly worry and Godly concern Matthew 6:25, Matthew 6:19, Luke 12:5.

discussion of spiritual verses natural man, Also See John 3:1-14 concerning Jesus's teachings on being born again, by spirit.

Theories of psychologists tend to numb the pain, as if the pain of unhardening your heart is the sickness instead of the cure for eternal life, exacerbate people's pain for profit like Sigmund Freud, and teach there is something wrong with people when they are sad at evil, when the Bible teaches there is something right. They are the only ones spared from the second death. See Ezekiel Chapter 9:3-6, Matthew 5:4.

On or about November 2, 2020, the Master filed a final notice of recommendation to dismiss my complaint as legally frivolous relating to standing. (D.I.81, Also see, Exhibit G, Docket Entrees and Exhibit H Appendix, Table of Exhibits to ascertain which documents I cite).

STATEMENT OF THE FACTS

This case arises upon President Trump's use of religion to govern as President, in his official capacity, not only in violation of the Establishment clause of the First Amendment of the US Constitution, the Equal Protection component of the Fifth 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 acting under the color of the law as President of the United States. See Exhibit A, 157-292, relating to Trump's misbehavior violating God's law under the guise of Godliness, including but not limited to tempting people to destroy the environmental harm. ⁵ See, Exhibit A, 236-292, Exhibit B, Exhibit 8, Exhibit F, Exhibit 45, relating to the environment.

⁵ Pursuant to Genesis 2:15, man is charged with the duty to care for the Earth. Revelation 11:18 teaches God will destroy those "who destroy the earth." I believe, meaning destroy in hell. It is wrong to teach folks the way to hell via unconcern towards the environment and towards one another for comfort, convenience or coins, under the guise of heaven.

I am a Christian. I believe in God revealed to me through the father, Jesus and the holy spirit, including the holy spirit shown through people in the Bible who freely, willfully chose to do God's will above their own. See Exhibit A.

Since I do not support Trump, and claim to be a democrat, people have accused me of not being a Christian which breaks my heart and substantially burdens my free exercise of religion by leaving it restrained and at times unexercised, but for Trump's incitement towards perceived, projected manufactured dissidents, including liberals like me, as antichrist.

God is the most important thing in my life. I place pleasing him, above my own desires and the desires of mere people.

Trump's pimping out my God for his government gain foreseeably upsets me and others with firm religious beliefs that conflict with his, to the point it is affecting my health, and likely the health of others. I have no freedom to speak, associate or belief if Trump foreseeably sickens or kills me of a broken heart because of his government-religion, a.k.a. government-party-religion.

My heart hurts merely listening to Trump use my God for his own vanity, while wearing his cloak of government authority. My blood pressure has unexpectedly increased to the point it poses a danger to my life. See Exhibit F, Exhibit 52.

I believe Trump misleads many to harm and hell, under the guise of heaven by manufacturing the illusion loyalty to his administration or the Republican party is loyalty to God, and that supporting ideas which conflict with Trump or his party is antichrist. As a direct, intentional result, Trump incites people to persecute democrats, including and specifically me, a liberal, democrat, as antichrist, often leaving my free exercise of speech, association and religion left restrained or unexercised.

In a course of conduct, collectively referred to herein as an “unholy-union” of “government-religion,” Defendant creates the illusion of supporting Christianity or accepting the support or backing of God or Christianity, while acting under “the color of the law,” thereby inherently, under the threat of the cloak of government authority, suppressing the free exercise of other different beliefs, than the religious beliefs, the government through its agent Defendant appears to support, including my belief in Christianity, thereby I believe, misleading people I love to hell, and destroying separation of church and government, making us all less free, including but not limited to:⁶

⁶ Under “the color of the law” language is included in the statute waiving sovereign immunity for injunctive and declaratory relief against Federal agents like President Trump. 5 USCS § 702.

1. The appointment of personal spiritual advisor, and alleged Christian leaders to advise the President, creating the appearance of support for Christianity, or religious backing of Defendant's government authority. Exhibit A, 293-298, Exhibit E, Exhibits 27, 28, 29, 41.

2. Holding up a Bible in front of a church for a photo op after people were gassed in response to their Constitutional exercise of affiliation and speech at a protest, making my God appear to approve violence, when Jesus teaches against violence, with no exception for government. See Exhibit A 299-319, Exhibit E, Exhibit 30. Matthew 5:38-39, Matthew 26:52, Genesis 9:5, Psalm 11:5.

3. Trump hypocritically claims "Biden will hurt the Bible," after Trump held up the bible for his own vanity earlier this summer, hurting the meaning of the Bible by glorifying himself in place of God. Exhibit A 320-321, Exhibit E, Exhibit 42.

4. Trump persecutes people who exercised their freedom not to worship, by demeaning those who omitted the word God in the pledge of the allegiance, while Jesus teaches people misbehave by praying seen and using God's name in vain, for political vanity. Loyalty to government party is not loyalty to God, even if leaders misbehave by citing God to support their own glory. Exhibit A 322-328, Exhibit E, Exhibit 31.

5. Trump improperly shared his alleged prayer to God, while acting under the color of the law, creating an appearance of a connection to my God. See Exhibit A, 329-335, Exhibit E, Exhibit 32.
6. Trump created the illusion there is a war on Christmas, by liberals like me.⁷ Exhibit A 336-347, Exhibit E 33.
7. Trump created the illusion he may be the chosen one by God. Exhibit A 348-353, Exhibit E, Exhibits 34, 35, 36.
8. Defendant moved the US embassy in Israel to Jerusalem for a religious group, Evangelicals. Exhibit A 354-355, Exhibit E, Exhibit 37.
9. Trump sponsors and incites private persecution towards liberals by churches and its parishioners, buying loyalty by barter or exchange, even by praise, for a little something down the line, such as bailouts, or power to persuade politicians, at the cost of teaching some preachers and parishioners to persecute non-Trump supporting liberals like me, and including me. See Exhibit A 356-371, Exhibit B, Exhibit 9, Exhibit E, Exhibit 38-39.

⁷I believe the traditions of men, societal peer pressured holiday giving is not based on unconditional love, but conditional caring, giving to get. Mark 7:8, Mark 7:7-9, Isaiah 1:13-15. I believe man-made holiday traditions such as Christmas mislead people to hell by replacing love, God, in the hearts of men with the deception business greed, gluttony and good times is love. 1 John 4:16 "God is love."

10. Defendant tweets fabrications making it appear democrats like me are attacking the church including the tweet. "DEMS WANT TO SHUT YOUR CHURCHES DOWN, PERMANTLY. HOPE YOU SEE WHAT IS HAPPENING. VOTE NOW." Exhibit F, Exhibit 44.

11. Defendant uses his son to serve his government seat by persecuting me by persecuting Democrats as non-Christians, manufacturing a fictitious threat that liberal democrats like me oppose freedom of religion, with the intent to incite Trump's supporters to demean people like me, resulting in such persecution. Eric Trump says that his "father 'literally saved Christianity...there is a full war on faith on the other side, (meaning my democrat side). (Eric continued), 'The Democrat Party, the far left, has become the party of atheists, and they want to attack Christianity'" Citing, Exhibit F, Exhibit 49.

12. Trump signed the Executive Order which increases the temptation for government employees, including the President, to back religions financially or otherwise, in hopes to receive their backing and support in return.

Trump intensifies the unholy-union of church and government, not based on freedom but bought or bartered for whoredom of my God's name, under the façade of freedom, by exacerbating tensions relating to sex, place of origin, disease, 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 government godliness. See Exhibit A, 18-292.

Trump teaches the gospel of greed, gluttony and good times leading to harm and hell under the guise of heaven or good, when it serves sin, giving into temptation. 3. ⁸

Trump whores out church to serve selfish gain reflecting the image of Satan by encouraging death in this life under the guise of godliness by encouraging people to go to church. See, Exhibit 47.

Satan brought death into the world, as Trump brings death to people in this world by increasing temptations to exacerbate the health risks during the pandemic. Wisdom 2:23-24, Hebrews 2:14, Romans 5:12.

The church is not a building, but the body of Christ is humanity. God will destroy those who destroy his temple in hell, meaning other people, regardless of race, religion or place of origin. 1 Corinthians 3:16-17, In this case God may destroy ignorant people, preachers, and Trump by increasing the probability of

⁸I reserve the right to use harsh language under the edification exception in the Bible, and the truthful language requirement in Court. In Amos, the Prophet called exploiting wealthy ladies, “fat cows.” Amos 4:1. Additionally, more than one profit called people they hoped to correct and save, whores or prostitutes. For example, see Ezekiel 16:34, Jeremiah 3:1, Leviticus 17:7 and Judges 8:33. Prophets called God’s beloved people “wild asses” too. Jeremiah 2:24 and Hosea 8:9.

their sickness and death during the pandemic to serve the tithing of churches, and government gain through such manufactured dissention to serve government gain under the guise of godliness in this government-religion of whoring my God for government gain.

Jesus scolds the religious leaders for worshipping God in vain, meaning for their own will, their own vanity in place of God's. Mark 7:7-9.

Trump tweeted a lie by tweeting, "Dems want to shut down churches permanently." See Exhibit F, Exhibit 44.

I do not want the churches to close permanently. I use my free will, my brain, to think, to care, to love others, by supporting measures that will decrease the temptations for people to get sick and die under the guise of godly-government by eliminating desperate conditions, instead of exacerbating them for business gain.

Trump's unholy-union creates the illusion that Republicans, his party is loved by God, and liberals and democrats like me are not loved by God, when God loves everyone, even non-Christians. I am not hated by God because I am an imperfect person with a different religious or political view than Trump or his claimed party. I believe God loves everyone, even though not everyone accepts God's love and salvation from eternal death.

The President must not be permitted to share religious beliefs, under the color of the law, while wearing the cloak of government authority, and bearing its might, as such unconstitutional speech inherently threatens people with different beliefs, including me particularly and individually. His rights must be deemed more limited in order not to suppress, eliminate my freedom under the threat his words cause others to persecute me directly.

I am not an antichrist just because I choose to be a member the Democratic party.

I believe some Republicans are misguided by misbehaving dead men in the federalist organization who desire lawlessness to reign under the guise of the law, but in truth reign by those with power, money or connections like them.

They teach if it is not written, it is not law. What is written is often by lawmakers selling their work to those who serve them instead of caring for those they are charged to serve, tempting them to draft unjust decrees, that reward misbehavior. business greed, driving out love for one another, or making laws unenforceable for the common man without money, power or connections.

Essentially enslaving the many to bondage of serving the wealth and convenience of the few in violation of the Thirteenth Amendment.⁹

I have righteous Godly anger towards the thoughtless words of “twice dead” men who teach lawlessness is the law, teaching others to reflect the image of the Devil, the “lawless one,” misleading them to destruction in hell under the guise of Godliness and government. Citing, Jude 1:12, meaning damned in the second death too. We have freedom of religion in the US, not a government-religion which pimps out the name of my God for government gain. Also citing, 2 Thessalonians 2:8-9 regarding “lawless one.” See, 1 Corinthians 2:15.

Lawlessness is not freedom it is reign by those with money, power and connections, without restraint, called laws, to prevent them from exploiting the people they profess to serve, to instead serve themselves.

Trump and future government agents should not be permitted to teach the way to hell under the guise of heaven, while acting under the color of the law by

⁹ I believe the Courts have the power to save souls by just decrees, just laws, and justice in the courts teaching love for one another, and correcting folks when they hurt one another for their love of money. I see Courts as potential heroes, eternal life savers, and life savers here on earth. I believe Courts misbehave and become life takers when they value money, power and connections more than the humanity they serve and guide. For an example of a heroic judge, Justice Holland called me up and tried to save Delaware with regards to misbehavior relating to title insurance, but he retired before saving the day. Citing, Exhibit F, Exhibit 46.

the unholy-union of government-religious power. Many people rely on those in government authority, seeking guidance and obedience in all matters government agents exert public influence upon, including matters of faith, an area our Constitution forbids government partiality.

The Honorable Master misstates one of my legal theories. I do not allege Trump creates the appearance of being “a devout Christian” as the Honorable Master opined. I allege the President creates the illusion of having the support of God, as appearing as a “God head,” and, or creating the illusion that supporting Trump supports God or my religion, Christianity, and, or inversely, not supporting him somehow suppresses my own religion or makes me into an antichrist or not a Christian.

People have accused me of not being a Christian since I do not support Trump. Exhibit A 19, 20. People have accused me of not being a Christian because I do not ignore Trump’s lawlessness and misdeeds, and the victims of his sins, despite the commands in the Bible to rebuke, love like Jesus by such discipline. to correct, with mercy, to prevent condemnation in hell and harm towards victims of Trump’s sins. See, Matthew 4:17, Luke 13:5, “...unless you repent, you too will all perish,” Mark 6:12, “They went out and preached that people should repent,” Hebrews 12:6, Deuteronomy 8:5, Revelation 3:19, Colossians 3:16, 1 Corinthians 4:14, and 2 Timothy 4:2.

People have accused me of not being a Christian since I am not a member of the President's party, the Republican party.

Just recently in early November, 2020, a woman said I could not be a Christian if I supported a party that supported abortion. I gently discussed the fact, I do not support abortion and even mentioned it before God and man that I do not support abortion or the death with dignity act, because I believe it is wrong to encourage people to kill themselves or others, die and go to hell, in my Complaint against the Democrats. See Exhibit B, Exhibit 2. I want people to live and have eternal life, not die for dollars, delights, comfort or convenience.

In October 2020, I went to the Target and chatted with a man as his wife listened, and we discussed God. We both claimed Jesus Christ. He mentioned his support for "God, county and his party," during the discussion.

I indicated that I supported God, but did not support President Trump. He said "we are done here."

Other strangers have told me I cannot be a Christian and a democrat. Other times, strangers' faces become distorted like a gremlin, ugly, angry frowning with disapproval, when they discover I am a democrat, conveying their views without words, making me hesitant to continue to speak forthrightly concerning important matters. My religious exercise includes speaking and interacting with people on

important matters, teaching them they are loved and to love one another, regardless of race, religion, diverse belief or place of origin. My free exercise has been substantially burdened by Trump's encouragement for church leaders and republican political leaders to demonize liberal-democrats like me, as alleged antichrists, because of the unholy-union of the church and Republican governing party Trump has exacerbated to serve business greed, the mark of the damned. ¹⁰

In turn demonization of people in my position is encouraged by followers of Trump, Republicans and churches, where preachers teach liberals and Democrats, like me, are not Godly, and Republicans are.

Just November 20, 2020, I spoke with a man who said the mark of the beast was written on the Biden Harris signs on the bottom. I said I disagree, but applaud him for looking into political and religious matters. He said I can't talk to you.

¹⁰ The mark of children of the devil is absence of love. Christians are known by their love. John 13:35. I believe unsaved people, children of the devil, glorify the punishment and the fruits of the punishment, such as death, martyrdom, marriage, sex, child bearing, business, money or gain by barter or exchange, reflecting the image of Satan by pride, glorifying self, living for self-gain, instead of receiving edification from God's discipline to learn humility and trust in God to gain salvation, not glorifying man in place of God. See Genesis Chapter 3 concerning the punishments for original sin.

I think open discussions, learning the other side, makes us smarter and freer. Trump's unholy-union has shut down free discussion under the threat of government sponsored private or public persecution.

The Executive Order increases the temptation for both Democrat and Republican government agents to grant government support for a religion backing the government agents or the government, creating and, or maintaining a government party backed religion. I notice President elect Biden inappropriately uses his religious faith for his own vanity, political gain, too. With the acceptance of governing authority, government agents have reduced freedoms in the form of limits to prevent the government from reducing the freedoms of those they serve.

The Honorable Master correctly states that I am injured by the loss of eternal lives of others. It is my worst nightmare that Trump created a government-religion, and government-religious belief, under the guise of government and God, which I believe leads people to mark their foreheads by what they think about and their hand by how they live with the mark of the beast, the mark of the damned, under the guise of salvation, via business greed, by barter or exchange, merely conditionally caring, with no God in them, for God is love, unconditional love. Exhibit. A 79-96, 109, 113, 318, and 1 John 4:16.

I do not want people I love to harm one another to serve their own, die to be damned on judgment day, all the while thinking they are doing good, when they do evil.

I am horrified by Bible boys gone wild in my home town, and businesses like Hobby Lobby and Chick Filet, pimping out my God like a Mickey Mouse mascot to serve their profit under the guise of Godliness, teaching what I believe is the mark of the beast is the way to salvation.

The deception of accepting the mark of the beast in your heart, love of money, or bought or bartered for material gain, driving out unconditional love for humanity, under the illusion it somehow protects you from the mark of the beast troubles me. I care about other people. Per the Bible, people go to hell because of their confusion, and for misunderstanding. See, 2 Corinthians 4:4, and Matthew 13. I am called to help the blind see by shedding light, God's Word on other's feet, as a born-again disciple of Jesus. I believe the government-religion contributes to this deception as truth, misleading many to harm and hell.

Deception destroys people in hell. It is horrifying to observe Defendant's exploitation of religious belief of his and or his party's projected God ordained Government power. Defendant's self-serving deception is not worth the cost of souls or the cost of making us all less free to worship or not according to the

dictates of our conscience with the inherent threat a government-religion creates against such exercise.

Catholic charities whores my God's name for business too. True charity is done unconditionally, not for a salary or paycheck, per Jesus Christ. In real life we can get sued for libel per se for honestly criticizing businesses, even religious businesses. Libel and slander laws are unjust decrees, silencing truth, free speech, for a buck. That is not freedom of speech, but whoredom to business greed. I am so angry as more people are dying to be doomed to hell under the deception of the Donald's direction towards dollars, and distracting delights, while encouraging hardness of hearts towards one another, the sin against the Holy Spirit. I feel so sad, some people think serving sin is serving God, and somehow my Godly, as opposed to worldly concern about Trump's unholy-union, is lack of my faith in Jesus, instead of living faith.

While businesses, churches, even my Catholic Church are free to misbehave by pimping out religion, Jesus's name and one another, trading favors, selling labor, themselves, their own souls, for a buck, under the guise of Godly love to serve their desire for the Almighty dollar under the guise of religion, the Government, and particularly President Trump is not free to support some religious organizations, religions, financially or otherwise, while demeaning other religions and manufacturing deceit such as accusing liberals like me as wanting to get rid of

God. I choose to lay down my life for God, even if I appear a fool before the world.

The Honorable Master mistakenly assumes she must determine who goes to hell in order to assess whether I am injured. The Honorable Court must not determine whether my beliefs are true regarding damnation.

The Court must merely determine whether my beliefs are sincere and genuine, and that this government created religion I believe I am under, but for Defendant's unholy-union, conflicts with my beliefs, and substantially burdens my exercise of fundamental rights, including the right to exercise my religious faith according to the dictates of my conscience, not the dictates of the Defendant, without threat of government sponsored public or private persecution for exercise of such beliefs.¹¹ See Exhibit A, B regarding my religious beliefs, and exhibits C,

¹¹ See, *State ex rel. Tate v. Cabbage*, 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

D, E, F regarding increasing desperate conditions to increase temptations to violate my religion, to sin, under the guise of Godly government.

With regards to my belief people are deceived by the Donald to be damned to hell should they remain under the deception of his manufactured government-religious beliefs, that goes to the severity of the burden upon me, and to causation relating to why I am persecuted. I teach the opposite of Trump, sacrificial love, not self-serving exploitation of outsiders to serve yourself and your own at the expense of harming others, under the guise of Godliness.¹² Some people think I am antichrist since I do not support Trump's government sponsored religion. My

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.

¹² *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 134 S. Ct. 2751, 189 L. Ed. 2d 675 (2014), “The “exercise of religion,” for purposes of the Free Exercise Clause and RFRA, involves not only belief and profession, but the performance of, or abstention from, physical acts that are engaged in for religious reasons.”

free exercise is chilled, and is left unexercised as a result of Trump's unholy-union of government-religion as a direct result of Trump's influence upon some of the people he misleads. Exercise of my religion is living faith, teaching the word not merely concerning the bible and God, but also teaching people about repentance and the way of love. They are loved by God. Others are loved by God too. It is wrong to harm other people God loves to serve your own or your love of money, no matter what the Trump religion sells people. My God is not for sale.

I confess I care about other people's lives, health and eternal lives. I love people, and do not desire they die to be damned to hell. Yet, elimination of my First Amendment freedom is considered irreparable for purposes of injunctive relief, even if establishment of religion misleading and deceiving people I love to harm and hell is not by this court. See, *Fulton v. City of Philadelphia*, 320 F. 661 (E.D. Pa. 2018), aff'd. 922 F.3d 140 (3d Cir. 2019), cert. granted sub nom. *Fulton v. City of Philadelphia, Pennsylvania*, 140 S. Ct. 1104, 206 L. Ed. 2d 177 (2020).

QUESTIONS PRESENTED

I. Whether I established standing to continue this cause of action by alleging, 1. I suffered an injury in fact, an invasion of a legally protected interest; 2. a causal connection between the injury and the conduct complained of, the injury has to be fairly traceable to the challenged action of the defendant; and 3. it must be likely, as opposed to merely speculative, that the injury will be redressed by a favorable decision.

1. Injury in Fact.

A. First, does the President's unholy-union of government-religion by his policies and Executive Order run afoul of the prescribed tests for violation of the Establishment Clause of the Federal Constitution, the Fifth Amendment Equal Protection Component, and the 42 USCS § 2000bb 1-4?

Second, if so, does the President's excessive entanglement of religion and state, the unholy-union, constitute a legally recognizable burden, a legal injury, on my Constitutional right to freely exercise my religion, speech, and association as a Christian liberal democrat?

Third, if my right to freely exercise my religion and association as a Christian Democrat is legally burdened (legal injury), is such burden justified by a compelling State interest?

2. Causation

A. Whether Plaintiff shows a causal connection between Trump's actions and the substantial burden on Plaintiff's free exercise of religion, since the alleged suppression of her free exercise of religion, in the form of persecution, was inflicted by persons other than Trump in response to Plaintiff's lack of support for President Trump or his choices, membership in the Democratic party, or support of a Democratic views, while maintaining her faith in Jesus Christ. (See, the D.I. 81, Final Report, Foot note 28).

B. Second, whether Plaintiff actually, and demonstratable suffered, suffers and continues to suffer a substantial burden, but for the President's excessive entanglement of religion and governing political gain.

3. Redressability.

Whether judicial relief would alleviate the burden upon Plaintiff's free exercise of religious beliefs.

II. Whether my case falls under the exception to mootness doctrine for matters of public importance that are capable of repetition but evading review.

III. Whether this dispute qualifies under another exception of the mootness doctrine, as capable of repetition but evading review.

IV. Whether dismissal of my case would deny me of access to the courts to address my fundamental rights, and whether this Court must grant me leave to amend to address shortfalls in the Complaint.

ARGUMENT

I. I established standing to continue this cause of action by alleging, 1. I suffered an injury in fact, an invasion of a legally protected interest 2. a causal connection between the injury and the conduct complained of, the injury has to be fairly traceable to the challenged action of the defendant; and 3. it must be likely, as opposed to merely speculative, that the injury will be redressed by a favorable decision.

1. Injury in Fact

A. The President's unholy union of religion and government through his policies and Executive Order run afoul of the prescribed tests in violation of the Establishment Clause of the Federal Constitution, the Fifth Amendment Equal Protection Component, and the 42 USCS § 2000bb 1-4.

In *Fulton v. City of Philadelphia*, 320 F. Supp. 3d 661, 690, 2018 U.S. Dist. LEXIS 116866, *57-58, 2018 WL 3416393, the Eastern District Court of Pennsylvania held, "The Supreme Court has provided two tests for deciding whether government action runs afoul of the Establishment Clause: the "endorsement test" and the Lemon test." Citing, *Doe v. Indian River School Dist.*, 653 F.3d 256, 282-83 (3d Cir. 2011).

The Defendant violates the Establishment Clause under both tests. Under the Lemon test, the Executive Order must be for a secular purpose. Gaining support of religion-based organizations to be tempted to support those religious groups and religions, as opposed to individuals, who support them is not a secular purpose, but a self-serving purpose for government gain at the cost of making me and other Americans less free, 2. The executive Order must not excessively entangle government with religion. The excessively entangles religion and government in an unholy-whored union giving birth to government bought or bartered for government-religion under the chilling threat of persecution against those who exercise a different belief, like mine, or non-belief than the government sponsored religion, which eliminates freedom of religion to forced religion. 3. The Executive order must not have a primary effect that advances or inhibits religion. The primary effect of the Executive Order has inhibited my free exercise of religion, and advances religious beliefs that advance Trump as a God head or God backed. It's weird. People have fallen for the illusion that Trump is Godly ordained in government, in an unholy-union of church and state. Trump is exploiting and encouraging this deception to the detriment of chilling my free speech, affiliation and exercise of religion. The Executive order is unconstitutional. Under the guise of protecting freedom of religion, it is eliminating freedom by selling it to only those who can pay.

In, *Trump v. Hawaii*, 138 S. Ct. 2392, 2399, 201 L. Ed. 2d 775, 779, 2018 U.S. LEXIS 4026, *1, 86 U.S.L.W. 4602, 27 Fla. L. Weekly Fed. S 503, 2018 WL 3116337, the Supreme Court held:

“The First Amendment provides that Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof. Judicial precedent recognizes that the clearest command of the establishment clause is that one religious denomination cannot be officially preferred over another.”

The President clearly prefers his and his party’s alleged, manufactured, perceived or adopted religious-government beliefs over my belief in Jesus Christ, as a liberal, Christian democrat. See Exhibit E, Exhibits 10, 11, 27-29, 31-39, 41-42.

The Executive Order clearly tempts government officials to prefer religious organizations who support them, over other organizations with diverse beliefs or non-beliefs too.

In fact, since the executive order was implemented, I have noticed an increase in the number of preachers online bad-mouthing liberals like me as not following Jesus, which makes me sad. People in my home town tend to listen to some of these preachers. People in my home town in turn bad mouth democrats like me as antichrists, which makes me sad. Some people in my home town make jokes that are no laughing matter because they go beyond jokes to beliefs.

“The Establishment Clause of the First Amendment restricts government capacity to favor a religion, or religion in general, (in the form of limits).” *Brown v. Borough of Mahaffey*, 35 F.3d 846, 850, 1994 U.S. App. LEXIS 27407, *10-11.

“The Establishment Clause forbids ... the preference of a religious doctrine or the prohibition of theory which is deemed antagonistic to a particular dogma.” *Kalman v. Cortes*, 723 F. Supp. 2d 766, 769, 2010 U.S. Dist. LEXIS 65171, *1, 39 Media L. Rep. 1039.

“The Establishment Clause prohibits government from establishing a religion in the sense of sponsorship, financial support, or active involvement of the sovereign in religious activity.” *Id.*

The Executive Order’s impact in fact tempts government leaders to support religious institutions in terms of bail outs, with the hope or expectation of loyalty in the form of verbal or financial support. See Exhibit E, Exhibits 38-39.

“The very adoption or passage of a policy that violates the Establishment Clause represents a constitutional injury.” *Kitzmilller v. Dover Area Sch. Dist.*, 400 F. Supp. 2d 707, 708, 2005 U.S. Dist. LEXIS 33647, *1.

The Executive Order and Trump’s policy of persecution is a constitutional injury.

The Constitution does not grant Trump a license to demean those with diverse political and religious beliefs like me.

Nevertheless, the President attacks liberal-democrats in general terms, liberal-democrats like me, villainizing me in the eyes of some of Trump's supporters, and people who appear like me, by deceit, saying we want to take away God and the Bible, in utter disregard for Constitutional limits upon his power.

I do not seek to take away God or the Bible. The Word of God is in my heart. I seek to live it with the strength of the holy spirit through me, by spreading truth and seeking justice with mercy, for correction to prevent condemnation and harm in life here too. See, Matthew 23:11, regarding greater commands of "justice, mercy and faithfulness," more important than monetary or material laws per Jesus. Also see, John 3:21, 1 Thessalonians 2:4, John 12:43, Acts 5:29, regarding obeying God's will, not our own will or other people's will, which leads to harm in this world and damnation.

Yet, Trump has impassioned some republicans to believe liberal-democrats like me are antichrists directly causing a substantial burden upon my free exercise of religion when I interact with them. I believe I am the Word when I lay down my life to do God's will, in place of my own worldly desires. It is not me, but God through me, through the guidance of the Holy spirit which reminds us of Jesus's

teachings. 2 Corinthians 3:2-3 provides, “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.” Exhibit A, 389. See, John 14:26, Jesus said, “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.”

Yet, strangers stop interacting with me concerning God, when they discover I am a democrat. Some accuse me of not being a Christian which makes me heart break.

I am ashamed to God to admit at times, I even withhold my speech concerning the Word of God when I listen to people’s insults towards people like me, their glorification of the business greed and family under the guise of God and the Republican party, and Trump, “as the best thing that (they say) ever happened to our country.” They do not know I think otherwise. Since they persecute those who believe as I do, I am sadly increasingly silenced.

The government sponsored public and private distortion of the bible and God to serve government, in place of God, or under the guise of God, including the vanity of Trump, as President, and the Republican governing party, substantially

burdens my free exercise of religion, speech and affiliation, based on my diverse belief. My free exercise has been chilled, restrained, and not freely exercised, but unexercised, as a result of such deception of a God backed party and religion, based on excessive entanglement of religion and government.

By the collective behavior forming the unholy-union including but not limited to the behavior above, Trump also violates the Establishment Clause under the Endorsement test.

In *Kitzmiller v. Dover Area Sch. Dist.*, 400 F. Supp. 2d 707, 708, 2005 U.S. Dist. LEXIS 33647, *1, the U.S. District Court for the Middle District of Pennsylvania held:

“As the endorsement test has developed through application, it is now primarily a lens through which to view "effect," with purpose evidence being relevant to the inquiry derivatively. The United States Supreme Court has instructed that the word "endorsement" is not self-defining and further elaborated that it derives its meaning from other words that the court has found useful over the years in interpreting the Establishment Clause. The endorsement test emanates from the prohibition against government endorsement of religion and it precludes government from conveying or attempting to convey a message that religion or a particular religious belief is favored or preferred. The test consists of the reviewing court determining what message a challenged governmental policy or enactment conveys to a reasonable, objective observer who knows the policy's language, origins, and legislative history, as well as the history of the community and the broader social and historical context in which the policy arose.”

The message of the challenged conduct, Trump's policy of persecuting perceived, projected or manufactured non-religion or a false "war on religion," based on my political affiliation, as a liberal-democrat endangers my life, and my free exercise of speech, affiliation and religion, under the threat of government sponsored public or private persecution, social, economic, violent or otherwise.

A "reasonable, objective observer who knows the policy's language, origins, and legislative history, as well as the history of the community and the broader social and historical context in which the Trump's policies and Executive Order arose would understand the purpose of Trump's message is to persecute non-Trump supporters on religious grounds, while garnering religious support for his governing position. Id.

The effect is Trump succeeded to do both with a section of our population.

Trump's purpose of government-religion is to gain support for himself and the Republican party, those who support him, thereby supporting himself. Trump also purposely exploits the name of my God to demean liberal democrats including me as antichrist, to serve his government power based on religious persecution.

Defendant creates the illusion that liberals like me are Godless, raging war on Christianity, with the purpose of inciting part of his base to demean liberals

such as and including me. Some people believe Trump. Thereby they persecute me as Godless.

The Third Circuit Court of Appeals held,

“Neither a state nor the federal government can set up a church. Neither can pass laws which aid one religion, aid all religions, or prefer one religion over another. Neither can force nor influence a person to go to or to remain away from church against his will or force him to profess a belief or disbelief in any religion. No person can be punished for entertaining or professing religious beliefs or disbeliefs, for church attendance or nonattendance. ... Neither a state nor the federal government can, openly or secretly, participate in the affairs of any religious organizations or groups and vice versa.” *Doe v. Indian River Sch. Dist.*, 653 F.3d 256, 259, 2011 U.S. App. LEXIS 16121, *1.

The United States through Trump set up a Trump/Republican form of government-religion whose policies both verbal and economic prefer those religious heads and organizations who may help their election seats.

In *Salvation Army v. Department of Community Affairs*, 919 F.2d 183, 185, 1990 U.S. App. LEXIS 19352, *1 the Third Circuit held,

“Association for religious purposes is in some circumstances protected by the second sense of freedom of association, the freedom of expressive association. An individual's freedom to speak, to worship, and to petition the government for the redress of grievances cannot be vigorously protected from interference by the State unless a correlative freedom to engage in group effort toward those ends are not also guaranteed. According protection to collective effort on behalf of shared goals is especially important in preserving political and cultural diversity and in shielding dissident expression from suppression by the majority. Consequently, the U.S. Supreme Court has long understood as implicit in the right to engage in

activities protected by U.S. Const. amend. I a corresponding right to associate with others in pursuit of a wide variety of political, social, economic, educational, religious, and cultural ends.”

The Third Circuit further held,

“In order to present a justiciable controversy in an action seeking a declaratory judgment to protect against a feared future event, the plaintiff must demonstrate that the probability of that future event occurring is real and substantial, of sufficient immediacy and reality to warrant the issuance of a declaratory judgment. Where the plaintiff seeks a declaratory judgment with respect to the constitutionality of a state statute, even where the attack is on U.S. Const. amend. I grounds, there must be a real and immediate threat of enforcement against the plaintiff. Moreover, this threat must remain real and immediate throughout the course of the litigation. The rule in federal cases is that an actual controversy must be extant at all stages of review, not merely at the time the complaint is filed. Where an intervening event removes these conditions, the court must not address the now-speculative controversy.” *Id.*

The threat is real and immediate against me by Trump or President elect Biden, should the transfer of power take place, should this Court fail to grant injunctive, declaratory relief, including but not limited to, declaring the Executive Order Unconstitutional, and declaring federal employees more limited in their free exercise of religious speech in order not to chill the freedoms of the people they serve.

The President passed the Executive Order under the legal authority of the same statute which is the subject of this dispute, the Religious Freedom Restoration Act.

Sovereign immunity is waived pursuant to Pursuant to 5 USCS § 702 in this action. President Trump is not immune because he has **no discretion** to disobey the same statute he uses as a sword to cut through our Constitutional freedoms, that I use as a shield to protect my freedom, and the freedoms of others through me. Cf. *Corus Group PLC v. ITC*, 352 F.3d 1351, 1353, 2003 U.S. App. LEXIS 24901, *1, 25 Int'l Trade Rep. (BNA) 1865, (“Where the President of the United States has **complete discretion** whether to take an action in the first place, courts are without authority to review the validity of an agency recommendation to the President regarding such action.”)(emphasis intended).

The test for the Religious Freedom Restoration Act pursuant to 42 USCS § 2000bb-1 provides,

“(a) In general. Government shall not substantially burden a person’s exercise of religion even if the burden results from a rule of general applicability, except as provided in subsection (b).

(b) Exception. Government may substantially burden a person’s exercise of religion only if it demonstrates that application of the burden to the person—

- (1) is in furtherance of a compelling governmental interest; and
- (2) is the least restrictive means of furthering that compelling governmental interest.”

The Government through Trump has substantially burdened my free exercise of religion, with no compelling government interest or use of any least restrictive means to support such compelling interest.

The Religious Freedom Restoration Act (42 USCS §§ 2000bb et seq.), only addresses Religious claims, not equal protection claims arising from alleged unequal treatment of religious practices by government. *Tyson v. Ratelle*, 166 F.R.D. 442, 1996 U.S. Dist. LEXIS 5697 (C.D. Cal. 1996). So, Equal protections claims must be pursued under the Fifth Amendment separately.

Note, my pleading needs legal amendments relating to my equal protection claims, not relating to the legal frivolous argument proffered by the Honorable Master relating to standing.

For example, the “applicable to or pursuant to the [Fifth] Amendment” and the via the [Fifth] Amendment” phrase the Honorable Master kindly directed my attention to should be struck. (See, D.I.81, Exhibit A at 19, 355, Count I, 436-438, Count II, 450, Count III, 477). If permitted, I should either remove or revise the references to the 5th in the Counts and relevant paragraphs to plead, the President’s discriminating words and deeds selectively persecutes liberal or radical-democrats like me, based on my affiliation and religion, including accusations of non-belief, as a liberal, Christian, democrat suppressing my free exercise of religion,

association and speech, under the threat of government sponsored public and private persecution in violation of the equal protection guarantee under the Fifth Amendment, to serve Trump's government authority, without justification necessary for a compelling government interest.

“The U.S. Supreme Court's approach to Fifth Amendment equal protection claims has always been precisely the same as to equal protection claims under the Fourteenth Amendment.” *Sessions v. Morales-Santana*, 198 L. Ed. 2d 150, 151, 2017 U.S. LEXIS 3724, *1, 137 S. Ct. 1678, 85 U.S.L.W. 4337; Citing, *Weinberger v. Wiesenfeld*, 420 U. S. 636, 638, n. 2 (1975).

I believe in Jesus and do not desire to take bibles away despite the President's words concerning so called radical-liberals like me or the radical-left. Per *Wilmington Christian School, Inc. v. Board of Education*, 545 F. Supp. 440, 440, 1982 U.S. Dist. LEXIS 14188, *1 “Any classification which serves to penalize the exercise of a constitutional right, unless shown to be necessary to promote a compelling government interest, is unconstitutional.”

Trump classifies radical-liberal-Democrats like me as antichrists in an attempt to penalize my exercise of free speech, association and exercise of religion to serve his seat, and encourage support for persecution against liberal Christian democrats like me.

Trump's words incite some of his supporters to persecute perceived, projected, or manufactured dissidents, sometimes, socially, economically, or violently. Exhibit F-Exhibit 54, Exhibit E-Exhibit 7.

Trump knows words matter. That is why Trump persecuted the NFL players for their peaceful communication that it is wrong for government agents to kill little black children. The misbehaving police officers' unconscious beliefs, not using their brains to analyze, not ignore, to think, to care, to love, instead of to cowardly fear, and destroy what they fear instead of love correct and protect is not justification for the disparate of blacks within the criminal judicial system. Id. Trump instills a cowardly wimpy-ness by government employees stemmed in an unconscious fear and satanic pride, not courageous love, mercy and humility towards those with diverse backgrounds.

Trump knows words matter. That is why he persecuted the words of the press, that shed light and truth on different angles of what Trump was selling us as truth, deception. Id.

Trump knows his words matter. Trump intentionally uses his words to incite people to persecute those who disagree with Trump, including me.

Trump's words directly and intentionally caused persecution towards me, as a perceived, projected or manufactured dissident in one of the classes of folks he

chose to persecute, as an antichrist. Words become ideas. Ideas become beliefs. Beliefs are the basis of our conduct. Trump's words directly caused persecution towards me. His words matter. He knows words matter. That is why he desires to exacerbate unjust decrees such as libel laws to whore freedom of speech to sell it to enslavement of the many to the powerful, well connected, and the wealthy. See Exhibit F-Exhibit 54.

Trump violates the Equal protection component of the Fifth Amendment by persecuting me individually, as a person in a class of people he persecutes, and for exercising my fundamental rights, without compelling justification.

The Court must not ignore Trump's unconstitutional words and deeds. He is not above the law, nor below the law. Under the Constitution, his freedoms are reduced in the form of limits in order to uphold, protect and safeguard the freedoms of those he serves. With the acceptance of the cloak of government power, those in office have reduced freedom under the First Amendment in order to make the common man more equal, which is quite beautiful and humbling.

B. The President's unholy-union of religion and government, constitute a legally recognizable burden, a legal injury, on my Constitutional right to freely exercise my religion, and freedom of association as a Christian liberal democrat.

But for such unholy propaganda accepted and or customarily proffered or sponsored or accepted by government agents and employees, I am not freely, but restrictively, able to exercise my religion through association, speech and conduct to serve God by shedding light on his word upon others to guide their steps from harm, under the threat of being called unpatriotic or unchristian or ignored or persecuted. My free exercise of religion is not free, but is restrained and unexercised because of Trump's deception serving Trump and the Republican party serves God.

My injuries are real, concrete, articulable, imminent, not speculative, conjectural or hypothetical.

I do not remember anyone ever telling me I was not a Christian until President Trump ran for office. But for President Trump's unholy-union, I would not be accused of not loving God. His burden has left a deep weight on my heart. While the Court cannot eliminate the scars of his piercing words and deeds, the court may lighten the burden on my heart and enable me to more freely exercise my religious beliefs. This Court can reduce the pain.¹³

¹³ I am a little scared about compromising my physical safety in exchange for exercising my religious belief via speech and conduct, seeking justice, mercy with faithfulness, via Matthew 23:11. See Exhibit A, 95, 286, Exhibit E, Exhibits 16, 23-25, relating to evidence of Trump increasing the temptation for people to become cowardly self-protective, defensive by use of violence, instead of

C. There is no compelling government interest to justify Defendant's legal burden upon my right to freely exercise my religion and association as a Christian Democrat.

Defendant's First Amendment rights are more limited by the Constitution, reduced in order not to chill the freedoms of those Defendant serves, including my free exercise of religion, speech and association to prevent the inherent threat of persecution, his insult against alleged antichrist liberal democrats causes towards me personally, granting those he deceives a license backed by his government authority to persecute me.

courageously loving enemies. Also see, Exhibit A 210-229, Exhibits E, Exhibits 17-19 and 40, demeaning women like me as something to look at, use or do, as things instead of as people to respect. At one time I had giant signs on my car that said "Serve your county, not your seat. Impeach" and "No one is above the law. No one is Below the Law. Impeach." But strangers made comments about shooting me. I received ugly notes under my windshield relating to my political stickers. Someone threw a white substance at my car, and I received so many middle fingers by cute white-haired old ladies in their cars, as I drove, that I became scared and took the stickers off. I took the stickers off months before I filed this complaint, I forget exactly when. I am concerned about being physically harmed based on my religious and political beliefs and seek the protection from danger by this Honorable Court. An order for injunctive and declaratory relief would alleviate my concern for government sponsored private violent persecution too, based on my belief in Jesus as a radical, liberal, Christian democrat. It would reduce the persecution of diverse religious groups stemmed in government officials, including Defendant, instigating or ignoring the unrest between diverse groups, instead of uniting them as Americans.

Monetary or Trump's and Government party's self-serving gain by loyalty or otherwise by religious organizations permitted to donate is certainly not a compelling interest. Money is not speech. If money is speech, then speech is not free, but is bought or bartered for, by only those with the ability to pay.

Likewise, demeaning liberal, democrats like me, accusing people with my association, to be anti-Christian to gain support for his government authority, election, and, or party are not compelling interests to support the burden upon my free exercise of speech, association and religion.

2. Causation

A. The facts evidence a connection between Trump's actions and the substantial burden on my free exercise of religion and association as a liberal Christian democrat, even though the alleged suppression of my free exercise of religion, in the form of persecution, was inflicted by persons other than Trump in response to my lack of support for President Trump or his choices, my membership in the Democratic party, or my support of Democratic views, while maintaining my faith in Jesus Christ. (See, the D.I. 81, Final Report, Foot note 28).

The Delaware Supreme Court in, *Keegan v. University of Delaware*, 349 A.2d 14, 16-17, 1975, 14 (Del. 1975), cert. denied, 424 U.S. 934, 47 L. Ed. 2d 342, 96 S. Ct. 1148 (1976) held, "If the purpose or effect of a law is to impede the

observance of one or all religions or is to discriminate invidiously between religions, that law is constitutionally invalid even though the burden may be characterized as being only indirect." Citing, *Braunfeld v. Brown*, 366 U.S. 599, 607, 81 S. Ct. 1144, 6 L. Ed. 2d 563 (1961), quoting, at 374 U.S. 398, 404, 83 S. Ct. 1790, 10 L. Ed. 2d 965; *Sherbert v. Verner*, 374 U.S. 398, 10 L. Ed. 2d 965, 83 S. Ct. 1790 (1963).

Trump's words and deeds affect those he serves, and influences their conduct and beliefs. His words became permission for some of his followers to repeat and use towards me, as they did, demonizing me as not being a Christian because I do not support Trump or his party. I am a Christian.

Trump's words, and behavior, including persecution of perceived, projected or manufactured dissidents, (in this case, liberal democrats like me, including me, as antichrists or anti-patriotic), encourages some of his supporters to do the same, by verbal, economic, social and sometimes violent means, as I argue in the articles of impeachment relating to Freedom of the Press and freedom of speech attached hereto in Exhibit 7.¹⁴

¹⁴ Trump's persecution of the press chilled my freedom to submit newspaper articles, to live my religion. I drafted the attached Exhibit F, Exhibit 48, to submit to the papers, but changed my mind. I must safeguard the freedom of the press from further insult and potential government persecution from Trump at the cost of

The President directly caused people's words and conduct to pierce through my heart, despite the fact the President did not speak them directly to me. The president directly authorized people to cruelly persecute and demean me as unworthy to talk or associate with when they learn of my association because of Trump's shameless demeaning statements concerning liberal democrats like me.

Trump intended to instill animosity towards me and other liberal radical democrats to serve himself and those who serve him, thereby serving himself.

It is foreseeable Trump's words would encourage such a result, actual persecution towards me individually, as a liberal in a highly Trump supporting county.

The President modelled attacks against liberals as non-Christians in his official position, under the color of the law, deceiving those he misleads into thinking mimicking the President's misbehavior is good, when it is bad.

The President's words and deeds are seen as orders by some of his supporters to act. The President need only to inspire others to act as he commands, to directly injure me.

not being free to exercise my speech and belief, but leaving it restrained and unexercised.

Trump's words persecuting liberals as anti-Bible or anti-Christian, under the guise of the law, directly sponsored public or private persecution towards me, like an invisible string, puppets of his power are pulled towards persecuting me personally, as a radical, Christian liberal, democrat by Trump's words.

Trump intended to exploit his manufactured version of Christianity to incite his supporters to persecute radical liberal democrats, including me based on the deceit we, I, am an antichrist, in an attempt to serve his election seat, and power as President.

Trump's policy of intentionally inciting persecution verbal, economic, violent or otherwise, successfully abridged my free exercise of speech, religion, and association under fear of harm, even physical harm, my heart has been hurting in my chest, even thinking with tears in my eyes, about people accusing me of not being Christian because I do not support Trump.

B. I actually, and demonstratable suffered, and continue to suffer a substantial burden, but for the President's excessive entanglement of religion and governing political gain.

"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, *.

“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

I will likely continue to suffer loss of First Amendment Freedoms if this Honorable Court fails to act, even if President Trump is removed on January 20, 2020, which cannot be guaranteed despite Biden’s win.

If the actual transition from President Trump to President-Elect Biden takes place, the harm to me is still the same. Though, admittedly the wounds will be from a different government agent, by one affiliated with the same party and religion. The temptation to exploit religion to serve government gain or the President elect’s gain remains, should the Court not remove the temptation, by penalizing, not rewarding by ignoring, government religion, governing in the name of religious faith creating an unholy-union of government and religion which glorifies man in place of God, under the guise of God.

Both men use my God’s name for their own vanity, for their own government gain, using their personal espoused or projected religious beliefs to gain government authority, at the expense of exacerbating the unholy-union, of a government-party-religion, or government-religious-belief.

Biden uses religion to serve his government gain too, and misbehaves by another set of conduct not ripe for discussion.

Further, as discussed below, this case is capable of repetition and likely to evade review. It appears Trump will likely distract and delay any criminal law suits filed against him should he actually leave the white house, and run again in 2024 in hopes to be judgment proof. He will likely encourage and sponsor continuous persecution against me, and others he sees as dissidents in the future.

3. **Redressability.**

A. Injunctive and declaratory relief would alleviate the burden upon my free exercise of religious beliefs, and prevent exacerbation of my wounds as I heal.

However, I respectfully request leave to amend the Complaint to seek additional relief. The Executive Order should be ruled unconstitutional as contributing to the temptation for both Democrat and Republican leaders to establish a party-religion that serves their election seats.

The Court must allow me to argue to remove the temptation to prevent additional, foreseeable, real, imminent harm that will likely be used by those in the legislative and executive branches, to the detriment of pitting religious groups against one another, making us all less free to worship or not according to the

dictates of our own conscience under the threat of government sponsored public or private persecution.

Judges have the power to stop rewarding misbehavior by choosing to hear cases where the common man, like me, is harmed by artificial entities, the federal government, and the President. You have the power to save me, save America, and save the world. I understand the Court is only empowered if asked properly. It is not the fault of the Court should I fail.

I merely ask for the opportunity to be heard, to seek justice, knowing there is no guarantee. After all, that is what makes America great the opportunity at justice. That opportunity, not guarantee, is what makes our country already great. Justice must be fought for or injustice is guaranteed. I choose to fight, with words not weapons, to maintain, and preserve our imperfect system of checks and balances, which affords correction, with mercy, to uphold, not destroy, the three branches when people within them abuse and misuse power for self-gain and glory, at the expense of reducing the freedoms of those they serve. None of us are gods, not even the President Trump, despite the weird claim he is God's chosen one. See Exhibit E, Exhibit 34.

I believe wise men use words. Weak men use weapons. I believe the wisdom of the Court's guidance can strengthen the weak, and reduce the temptation for

Americans to turn to violence. There have been attacks on churches, synagogues and diverse religious groups during Trump's administration.

Trump lights the fuel for the fires of hell by igniting religious persecution against me, and other groups by his encouragement and by his executive order. Please put out that flame.

II. My case falls under the exception to mootness doctrine for matters of public importance that are capable of repetition but evading review. See, *State Farm Mut. Auto. Ins. Co. v. Davis*, 80 A.3d 628, 632–33 (Del. 2013); *MPT of Hoboken TRS, LLC v. HUMC Holdco, LLC*, No. CIVIL. 8442-VCN, 2014 WL 3611674, at *9 (Del. Ch. July 22, 2014); *Kahn v. Kolberg Kravis Roberts & Co., L.P.*, 23 A.3d 831, 836 (Del. 2011).

“There is a recognized exception to the mootness doctrine when the appeal raises matters of public importance that are capable of repetition but evade review.” Citing, *Smith v. State*, 198 A.3d 176 (Del. 2018).

“A trial judge's legal conclusions are reviewed de novo.” *Kahn v. Kolberg Kravis Roberts & Co., L.P.*, 23 A.3d 831 (Del. 2011)

This appeal is related to matters of public importance, preserving fundamental rights, including my free exercise of religion, speech and association from government suppression.

This appeal also relates to the imminent public threat of increasing the establishment of government agent religions, government party religions, and the danger of igniting government political government party fighting between different religious organizations that will likely cause more bloodshed than we have already seen against religious groups, or by religious extremists the past 6 years in the United States and globally.

Our government should not be permitted to misbehave by using religion to reign like other countries, including Israel.¹⁵ We must respect people's free exercise of conscience, including my own, to worship or not according to our own conscience our own free will, not forced will of others, which is not freedom but enslavement to the religious wills of the few under the threat of social, economic, or violent persecution.

We must keep ourself separate from the sins of other countries, by upholding the freedom to worship or not, according to the dictates of our own conscience not the dictates of the government and government employees like the President.

¹⁵ Israel reigns by violence or threat of violence, requiring two-year service of every citizen in the army, under the guise of God and government, an unholy-union. Israel violates the Torah, the Book they profess to govern under by persecuting Muslims and Palestinians when God says "And you are to love those who are foreigners, for you yourselves were foreigners in Egypt." Deuteronomy 10:19. See Romans Chapter 9, Not all Israel is Israel, it is not by bloodline.

The issues are capable of repetition yet evading review.

President Trump may run for office in 2024. He will likely continue to exploit Christianity in an attempt to serve government gain, his election seat.

Trump faces potential law suits once his presidency ends. Trump and his family have been involved in thousands of law suits, over his many years in life. He is so old, and more experienced than many attorneys. It is foreseeable he will manipulate the courts and a potential presidency to escape correction by courts.

Trump will likely delay to defeat opponents in any future law suits, driving up costs, and time to defeat his opponents after his presidency, should he actually step-down Jan. 20, 2020. He will likely delay the cases until 2024 in hopes he may argue he is judgment proof should he become President again. A delay is likely to result as the pandemic worsens the next 1-3 years. The courts may partially close down.

I must be permitted to seek to remove the temptation for Trump to make a mockery of the courts and my God by preventing him from exacerbating the unholy-union of religion and state to serve his election seat in the future.

Even if Trump decides not to remain in office, or to run again in 2024, it is likely Biden and other federal employees will exploit religion under the Executive Order, and by alleged faith-based policies, suppressing and supporting the religions

that serve their government power in the immediate future. I will likely face the same Constitutional injury, albeit by a different President.

III. This dispute qualifies under another exception of the mootness doctrine, as capable of repetition but evading review.

In *United States v. Sanchez-Gomez*, 138 S. Ct. 1532, 200 L. Ed. 2d 792 (2018), The United States Supreme Court held, “A dispute qualifies for the exception to the mootness doctrine for a controversy that is capable of repetition, yet evading review only if (1) the challenged action is in its duration too short to be fully litigated prior to its cessation or expiration, and (2) there is a reasonable expectation that the same complaining party will be subjected to the same action again.”

Here, (1) the challenged action may be too short to be fully litigated against President Trump since President Elect Biden is replacing him, and (2) there is an expectation that I will be subjected to the same action again, albeit by a different President, based on my different religious and political beliefs, speech and association than Biden; or by President Trump again, should he remain in office or run for President in 2024.

This Court must allow this case to move forward to prevent continued and future abuse.

IV. The Court must not deny my access to the courts to address my fundamental rights, but must grant me leave to amend to address shortfalls in the Complaint.

The Court must not deprive me of the opportunity to be heard, merely because I inartfully pled my case, in my desperate desire to act quickly, albeit imperfectly, to prevent the continued substantial burden on my free exercise of religious beliefs speech, and association as a liberal Christian democrat.

If this Court deems my complaint defective, I still should not be deprived of access to the courts, to prevent denial of my Constitutional rights. I must be granted leave by this Honorable Court to amend my complaint to address all the Honorable Court's concerns.

“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).

“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).

There is arguably evidence this Court is seeking to deny my claim based on “potential prejudice” relating to wealth, affiliation and/or religious belief. See Exhibit 55.

“Courts are cautioned that because of the liberal pleading standard, a plaintiff should generally be granted leave to amend before dismissing a claim that is merely deficient.” Citing, *Grayson v. Mayview State Hosp.*, 293 F.3d 103, 108 (3d Cir.).

V. Conclusion:

“In the initial review process mandated by statute is the requirement that the Court determine whether the complaint is factually frivolous, legally frivolous or malicious. Del. Code Ann. tit. 10, § 8803(b). These terms are defined as follows: “legally frivolous” shall mean a claim based on an indisputably meritless legal theory.” *Gagnon v. Taylor*, 1998 Del. Super. LEXIS 408, *1, 1998 WL 729625

“Should the court decide to grant a motion to proceed in forma pauperis, its next step is to determine whether the complaint is factually frivolous, legally frivolous, or malicious. Del. Code Ann. tit. 10, § 8803(b). The purpose of this review is to determine whether service of process will issue or the complaint will be dismissed as factually frivolous, malicious or legally frivolous. All well-pled matters are accepted as true to determine whether the petitioner can recover under

any conceivable set of circumstances susceptible of proof under the complaint.”

Marvel v. State, 2014 Del. Super. LEXIS 638, *1, 2014 WL 7009516

“If the complaint is not frivolous, then service of process may be issued in order for the case to move forward.” *Id.* Del. Code Ann. tit. 10, § 8803(c).

I demonstrated evidence of standing, injury in fact, causation and redressability, to protect my fundamental right to freely exercise my religion and speech according to the dictates of my conscience, and to associate as a liberal Christian democrat, without government sponsored persecution.

My theory is not an “indisputably meritless legal theory,” but is based on sound logic on matters of personal faith, my religious beliefs and free association and speech relating to those beliefs. I may recover under a conceivable set of circumstances susceptible of proof under the complaint.

This Court must grant me the opportunity to be heard to safeguard the freedom to worship or not without government sponsored private or public persecution. This Court must allow me to plead to remove the establishment of government party religion, the republicans’ government sponsored version of Christianity, and remove the temptation from the Democratic party from foreseeably doing the same by rendering the Executive Order unconstitutional, granting injunctive, and granting the declarative relief requested.

If I should fail, that is on me, not the Court. Please allow me to try to stand up for my faith in Jesus, in democracy, in justice, in our courts, as an imperfect radical, liberal Christian, democrat who places her trust in a perfect God, and a court system, with checks and balances, including appeals.

We are all winners, when we do the right thing, even if we fail. Allowing me to potentially fail against the most powerful man in the world, instead of protecting me from potential embarrassment is not helping me or the courts. I appreciate the Honorable Master's guidance in her determination before Defendant has an opportunity to attack my pleadings.

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.

Dated: December 5th, 2020

Respectfully submitted,
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